

# CHAPTER 8 Response to Comments

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# RTC CHAPTER 1 Introduction

## 1.1 PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT

This document has been prepared to respond to comments received on the joint Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) prepared for the Potrero HOPE SF Master Plan Project (Proposed Project). The Draft EIR/EIS identifies the likely environmental consequences associated with the implementation of the Proposed Project and recommends mitigation measures to reduce significant impacts. This Responses to Comments document provides a response to each comment received and revises the Draft EIR/EIS, as necessary, to correct or clarify information.

None of the comments received provides new information that warrants recirculation of the Draft EIR/EIS under the California Environmental Act (CEQA) nor preparation of a supplement under the National Environmental Policy Act (NEPA). In the context of the CEQA analysis, the comments do not identify new impacts that would result in a substantial increase in the severity of impacts and do not include feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR/EIS and/or that the project applicant has refused to implement.

As discussed in Section 5.3, *Aesthetics and Visual Quality*, of the Draft EIR/EIS and in Chapter 3 of this document, the Proposed Project is subject to Senate Bill (SB) 743 and Section 21099 of the Public Resources Code, which eliminated the analysis of aesthetics impacts for certain infill projects under CEQA. Accordingly, the Draft EIR/EIS does not provide CEQA conclusions regarding aesthetics and impacts to views and the aesthetics analysis are presented entirely in the context of NEPA. The aesthetics/visual quality analysis was reevaluated based on comments received on the Draft EIR/EIS. As discussed in Chapter 3, *Comments and Responses*, and Chapter 4, *Draft EIR/EIS Revisions*, of this document, the revised analysis found that impacts were significant but mitigatable. A new mitigation measure was added to address significant impacts related to views.

The CEQ NEPA Regulations (40 CFR 1503.4) require that an agency preparing a Final EIS respond to comments by one or more of the following means:

- Modify alternatives including the proposed action;
- Develop and evaluate alternatives not previously given serious consideration;
- Supplement, improve, or modify the analysis;
- Make factual corrections; or
- Explain why comments do not warrant further response.

The revised aesthetics analysis presented in Chapter 4, *Draft EIR/EIS Revisions*, supplemented, improved, and modified the aesthetics discussion initially presented in the Draft EIR/EIS by carefully considering public comments with regard to views and reevaluating the findings initially made. The revised findings prompted the identification of a feasible mitigation measure to attempt to reduce the significance of the revised finding. The revised analysis and additional mitigation measure are mandated by CEQ regulations and do not apply to analyses prepared in accordance with CEQA and its implementing regulations.

The CEQ NEPA Regulations (40 CFR Section 1502.9) set forth that agencies shall prepare a supplement to either Draft or Final EIS if the agency makes substantial changes to the proposed action that are relevant to environmental concerns or there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. NEPA does not require the Draft EIR/EIS be supplemented because the mitigation measure requiring a reduction in heights has been included to address comments received during the public review period and the mitigation measure would serve to reduce potential aesthetics impacts. The purpose, objective and need for the Project would still be met even with implementation of the mitigation measure as this does not represent a substantial change to the Project.

This Responses to Comments document, together with the Draft EIR/EIS, constitutes the Final EIR/EIS for the proposed Potrero HOPE SF Master Plan Project.

## **1.2 ENVIRONMENTAL REVIEW PROCESS**

An environmental evaluation application (EE application) was submitted to the San Francisco Planning Department in June 2010. The filing of the EE application initiated the environmental review process as outlined below.

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

As described in the Draft EIR/EIS, on November 10, 2010, the Planning Department distributed a Notice of Preparation (NOP) to all occupants of the Potrero Terrace and Annex housing developments; owners of properties within 300 feet of the Project site; owners and tenants of properties adjacent to the Project site; and other potentially interested parties, including various regional and state agencies; and neighborhood organizations. A scoping meeting was held on November 22, 2010. The scoping meeting provided the public and affected governmental agencies with an opportunity to present their environmental concerns regarding the Proposed Project.

On May 2, 2012, U.S. Department of Housing and Urban Development HUD issued a notice of intent (NOI) to prepare a Draft Environmental Impact Statement to inform agencies and the general public that a joint EIR/EIS was being prepared, and invited comments on the scope and content of the document. The NOI provided contact information for City staff responsible for the NOI, and provided instructions for submitting comments. The scoping meeting held on May 17, 2012 provided the public



and affected governmental agencies with an opportunity to present their environmental concerns regarding the Proposed Project. A copy of the NOP and NOI are included in Appendix 1 of the Draft EIR/EIS.

### **1.2.2 Draft EIR Public Review**

The Draft EIR/EIS was made available for a 60-day public review period beginning on November 7, 2014 to solicit public comment from agencies and individuals on the adequacy and accuracy of the Draft EIR/EIS. A Notice of Availability (NOA) of the Draft EIR/EIS was posted on the websites of the San Francisco Planning Department and Mayor's Office of Housing and Community Development (MOHCD) as well as in the Federal Register. The NOA was distributed to applicable local and State agencies, interested parties, owners and occupants of properties within 300 feet of the Project site, individuals likely to be interested in the potential impacts of the Proposed Project, commenters on the NOP and NOI, and those individuals who requested a copy of the Draft EIR/EIS. Copies of the Draft EIR/EIS were also available for public review during normal business hours at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA; the Planning Information Center at 1660 Mission, First Floor, San Francisco, CA 94105; and the MOHCD offices at 1 South Van Ness Avenue 5th Floor, San Francisco, CA 94103. The Draft EIR/EIS was also posted for public review at <http://www.sf-planning.org/index.aspx?page=1828> and <http://sf-moh.org/index.aspx?page=1314>.

The public comment period for the Draft EIR/EIS ended on January 7, 2015. The San Francisco Planning Commission held a public hearing on December 11, 2014 to accept comments on the Draft EIR/EIS. Copies of all written comments received during the comment period are included in Attachment A, Draft EIR/EIS Comment Letters and Emails. A transcript of oral comments provided by Planning Commission members and members of the public during the public hearing is included in Attachment B Draft EIR/EIS Public Hearing Transcript.

### **1.2.3 Responses to Comments Document and Final EIR/EIS**

The comments received during the public review period are the subject of this Responses to Comments document, which addresses all substantive written and oral comments on the Draft EIR/EIS. Under California Environmental Quality Act (CEQA) Guidelines Section 15201, members of the public may comment on any aspect of the Proposed Project. Further, the CEQA Guidelines Section 15204(a), states that the focus of public review should be "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines Section 15088 specifies that the lead agency is required to respond to the comments on the major environmental issues raised in the comments received during the public

review period. Therefore, this Responses to Comments document is focused on the sufficiency of the Draft EIR/EIS regarding the significance of the environmental impacts of the Proposed Project.

The San Francisco Planning Department and MOHCD distributed this Responses to Comments document for review to the San Francisco Planning Commission as well as to the agencies, neighborhood organizations, and persons who commented on the Draft EIR/EIS. The Planning Commission will consider the adequacy of the Final EIR/EIS – consisting of the Draft EIR/EIS and the Responses to Comments document – in complying with the requirements of CEQA. If the Planning Commission finds that the Final EIR/EIS complies with CEQA requirements, it will certify the Final EIR/EIS and will then consider the associated Mitigation, Monitoring and Reporting Program (MMRP).

Consistent with CEQA Guidelines Section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines Sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings must include a Statement of Overriding Considerations for those impacts (CEQA Guidelines Section 15093[b]) if the project is approved. There are no impacts of the Proposed Project that cannot be mitigated to less than significant levels; therefore this will not be applicable for this project. The project applicant will be required to implement the mitigation measures as conditions of project approval.

For National Environmental Policy Act (NEPA) compliance, along with the publication of the Draft EIR/EIS the director of the MOHCD as Certifying Official for Part 58 Projects will publish a Notice of Intent to Request a Release of Funds (NOI RROF). The NOI RROF, which normally has a comment period of seven days, will be held open for comment for 30 days to coincide with the timing requirements of the Council on Environmental Quality (CEQ) regulations. Upon the close of the 30 day but not before 90 days since the publication of the Draft EIR/EIS, MOHCD will publish a Record of Decision and submit the RROF to HUD. Upon submission of the RROF to HUD, the public will have the opportunity to object to HUD for a period of 15 days as set forth at 24 CFR 58.75.

### **1.3 DOCUMENT ORGANIZATION**

This Responses to Comments document consists of the following chapters:

1. **Chapter 1. Introduction** – This chapter discusses the purpose and organization of this Responses to Comments document and summarizes the environmental review process for the project.
2. **Chapter 2. List of Persons Commenting** – This chapter contains a list of agencies, organizations, and individuals who submitted written comments on the Draft EIR/EIS during the public review period or oral comments at the public hearing.

3. **Chapter 3. Comments and Responses** – This chapter contains responses to all substantive written and oral comments received on the Draft EIR/EIS. The responses have been organized by topic in the order of topics presented in the Draft EIR/EIS. Reproductions of the comment letters are available in Attachment A of this Responses to Comments document; a transcript of oral comments provided during the public hearing is included in Attachment B.
4. **Chapter 4. Draft EIR Revisions** – Corrections to the Draft EIR/EIS necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR/EIS, are contained in this chapter. Text with double underline represents language that has been added to the Draft EIR/EIS; text with ~~striketrough~~ has been deleted from the Draft EIR/EIS. These changes have not resulted in significant new information with respect to the Proposed Project, including any new significant environmental impacts or new mitigation measures. Therefore, recirculation of the Draft EIR/EIS is not required.

**Attachment A** – Draft EIR/EIS Comment Letters

**Attachment B** – Draft EIR/EIS Public Hearing Transcript

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# RTC CHAPTER 2 List of Persons Commenting

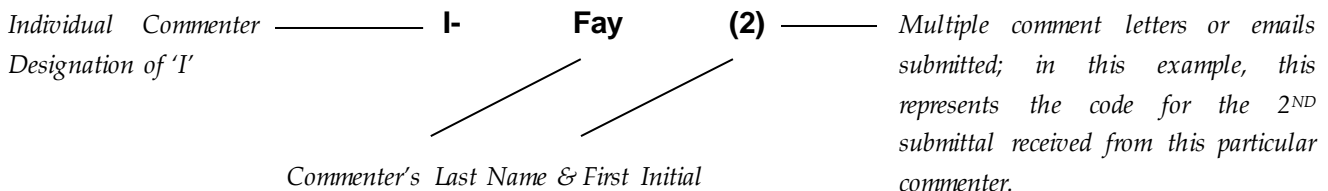
This chapter presents a list of letters and comments received during the public review period and describes the organization of the letters, emails, and transcript that are included in Chapter 3, *Comments and Responses*, of this document. Commenters are grouped in tables by category: Table 2-1, Commissions; Table 2-2, Agencies; Table 2-3, Individuals Commenting on the Draft EIR/EIS via Email or Letter; and Table 2-4, Individuals and Organizations Commenting at the Public Hearing held December 11, 2014.

## 2.1 ORGANIZATION OF COMMENTS

Comments received on the Draft EIR/EIS include written comments submitted by letter or email, and via oral comments presented at the December 11, 2014 public hearing conducted by the San Francisco Planning Commission. This chapter lists all persons who commented during the comment period, grouped according to whether they represent a commission, agency, or individual and organization and the format in which their comment was received (see Tables 2-1, 2-2, 2-3, and 2-4). Each comment within each of these categories has been assigned a unique comment code for ease of identification; the codes are also listed in the tables referenced previously.

Each unique comment code includes a prefix that indicates whether the commenter represents a neighborhood organization (O), is an individual (I), or agency (A). The prefix for organizations (O) is followed by a hyphen and the acronym of the agency or organization and the commenter’s last name. The prefix for individual commenters (I) is followed by a hyphen and the individual’s last name. When multiple comments were received from a particular individual, a number in parentheses indicates the order in which comments (including letter, email, or public hearing comment) were received from that individual. (See example on next page.) The complete set of written and oral comments received on the Draft EIR/EIS is provided in Attachment A, Draft EIR/EIS Comment Letters and Emails, and Attachment B, Draft EIR/EIS Public Hearing Transcript. The name of the commenter or organization and the format of the comment (letter, email, public hearing transcript), and comment date are indicated within these attachments.

The example below has been constructed in order to show comment code component definition for code I-Fay (2). In this example, the commenter submitted multiple comments and has the same last name (Fay) as another individual who also submitted comments.



## 2.2 LIST OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS COMMENTING ON THE DRAFT EIR/EIS

The following comment letters and emails were submitted to the City during the public review period. Many commenters who submitted comments on the Draft EIR/EIS via email and letter also provided comments in person at the public hearing; they are thus listed multiple times in the tables below. See Section 2.1, *Organization of Comment Letters*, for a detailed description of the coding for each comment received.

<b>Table 2-1 List of Commissioners Commenting on the DEIR/DEIS at the Public Hearing on December 11, 2014</b>	
<b>Commenter Code</b>	<b>Name of Commissioner and Commission</b>
A-Commissioner Antonini	Michael J. Antonini, San Francisco Planning Commission
A-Commissioner Johnson	Christine D. Johnson, San Francisco Planning Commission
A-Commissioner Moore	Kathrin Moore, San Francisco Planning Commission
A-Commissioner Wu	Cindy Wu, San Francisco Planning Commission

<b>Table 2-2 List of Agencies Commenting on the DEIR/DEIS</b>				
<b>Commenter Code</b>	<b>Name of Person</b>	<b>Governmental Agency</b>	<b>Via</b>	<b>Date</b>
A-U.S. DOI	Patricia Sanderson Port	U.S. Department of the Interior	Letter	January 7, 2015
A-U.S. EPA	Kathleen Martyn Goforth	U.S. Environmental Protection Agency	Letter	January 5, 2015
A-Caltrans	Patricia Maurice	California Department of Transportation	Letter	January 6, 2015
A-CA SCH	Scott Morgan	California State Clearinghouse and Planning Unit	Letter	January 8, 2015
A-BAAQMD	Jean Roggenkamp	Bay Area Air Quality Management District	Letter	January 7, 2015
A-SFPUC	Irina P. Torrey	San Francisco Public Utilities Commission	Letter	January 6, 2015

<b>Table 2-3 List of Individuals Commenting on the DEIR/DEIS via Email or Letter</b>			
<b>Commenter Code</b>	<b>Name of Person</b>	<b>Via</b>	<b>Date</b>
I-Abel (1)	Lee Abel	Letter	January 4, 2015
I-Aquino	Vanessa Aquino	Email	January 5, 2015
I-Brown	Niesha Brown	Letter	January 7, 2015
I-Cameron	Reynolds Cameron	Email	January 7, 2015
I-Costamagna	Matt Costamagna	Email	December 28, 2014
I-Dhillon	Jennifer Dhillon	Letter	January 6, 2015
I-Fay (1)	Jane Fay	Letter	December 3, 2014
I-Fay (2)	Jane Fay	Letter	December 11, 2014
I-Fenili E	Eduardo Fenili	Email	January 5, 2015
I-Fenili F	Francesca Fenili	Email	January 7, 2015
I-Glober	David Glober	Letter	December 30, 2014
I-Gudmundsson (1)	Dadi Gudmundsson	Letter	December 15, 2014
I-Heath	Alison Heath	Email	January 6, 2015
I-Lee H	Homer Lee	Letter	January 4, 2015
I-Lee R (1)	Richard Lee	Email	January 5, 2015
I-Marini	Linda D. Marini	Letter	January 7, 2015
I-Meroz	Yoram Meroz	Email	January 7, 2015
I-Montalto (1)	Dennis Montalto	Letter	January 4, 2015
<b>I-O'Rourke</b>	<b>Kevin O'Rourke</b>	Letter	January 6, 2015
I-Raffel	Daniel Raffel	Email	January 5, 2015
I-Reid	Daniel Reid	Letter	December 21, 2014
I-Robbins	Nathaniel Robbins, MD	Letter	December 11, 2014
I-Sabre and Loura (1)	Christopher Sabre and Jean Loura	Email	January 5, 2015
I-Sabre and Loura (2)	Christopher Sabre and Jean Loura	Letter	January 5, 2015
I-Schurnghammer	Marlene Schurnghammer	Letter	Undated
I-Serwer and Dreschler (1)	Jennifer Serwer and Thomas Drechsler	Letter	December 3, 2014
I-Serwer and Dreschler (2)	Jennifer Serwer and Thomas Drechsler	Letter	December 3, 2014
I-Shaw (1)	Thomas Shaw	Letter	December 27, 2014
I-Sundell (1)	Carol Sundell	Email	January 5, 2015
I-Wang	Suling Wang	Email	January 6, 2015
I-Zwigoff	Terry Zwigoff	Email	January 5, 2015

<b>Table 2-4 List of Individuals and Organizations Commenting at the DEIR/DEIS at the Public Hearing on December 11, 2014</b>	
<b><i>Commenter Code</i></b>	<b><i>Name of Commissioner and Commission</i></b>
I-Abel (2)	Lee Abel
I-Aragon	Maritza Aragon
I-Bergeron	Bonnie Bergeron
I-Boss	Joe Boss
I-Carpinelli	Janet Carpinelli
I-Christiansen	Kim Christiansen
I-Gudmundsson (2)	Dadi Gudmundsson
I-Hunting	Patricia Hunting
I-Kwan	Mr. Kwan
I-Lee (2)	Richard Lee
I-Montalto (2)	Dennis Montalto
I-Shaw (2)	Thomas Shaw
I-Zen	Ms. Zen
I-Zhang	Mr. Zhang
O-Bridge Housing	Emily Weinstein
O-Potrero Boosters	J.R. Eppler
O-Rebuild Potrero	Thu Banh



# RTC CHAPTER 3      **Comments and Responses**

This chapter summarizes the substantive comments received on the Draft EIR/EIS and presents the responses to those comments.

## **3.1 ORGANIZATION OF RESPONSES TO COMMENTS**

To facilitate the preparation of responses, comments were assigned unique comment codes, and they are generally organized by subject and presented in the same order as in the Draft EIR/EIS, ending with general comments on the EIR/EIS or the Proposed Project. Comments related to the project description or those on a specific analysis or mitigation measure are included under the relevant topic section. The order of the comments and responses in this chapter is shown below, along with the prefix assigned to each topic code.

- Project Description (PD)
- Alternatives (AL)
- Land Use and Land Use Planning (LU)
- Visual Quality/Aesthetics (AE)
- Socioeconomics and Community/
- Population and Housing (SE)
- Transportation and Circulation (TR)
- Noise (NO)
- Air Quality (AQ)
- Greenhouse Gas Emissions (GG)
- Wind and Shadow (WS)
- Recreation (RE)
- Utilities and Service Systems (UT)
- Public Services (PS)
- Biological Resources (BI)
- Hazards and Hazardous Materials (HZ)
- Cumulative Analysis (CA)
- Other CEQA/NEPA Considerations (OC)
- General Comments and Scope of the Draft EIR/EIS (GC)

Within each section of this chapter under each topic area, similar comments are grouped together and numbered sequentially using the topic code prefix and sequential numbering for each subtopic. For example, comments on the Project Description [PD] are listed as [PD-1], [PD-2], [PD-3], and so on. Within each topic code and corresponding heading that introduces the comment subject are the quoted comments followed by the commenter's name, and the comment code that identifies the specific comment document and comment being addressed by the section. A detailed explanation of the nomenclature used for comment coding can be found in Chapter 2 of this document. The comments are presented verbatim except for minor typographical corrections. Photos, figures, and other attachments submitted by commenters and referenced in individual comments are included in the applicable Responses to Comments attachment; they are not reproduced as part of the comments in Chapter 3, Comments and Responses.

For the full text and context of each comment, the reader is referred to Attachment A, Draft EIR/EIS Comment Letters and Emails, and Attachment B, Draft EIR/EIS Public Hearing Transcript. In some cases, a comment includes multiple comment topics. Individual comments on separate topics from each commenter are bracketed and coded as per the concerned topic within the comment letters;

the bracketed comments and corresponding comment codes are shown in the margins of the comments in Attachments A and B.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comments and to clarify or augment information in the Draft EIR/EIS, as appropriate. Response numbers correspond to the topic code; for example, the response to comments on topic PD-1 is provided under Response PD-1. The responses provide clarification of the Draft EIR/EIS text and may also include revisions or additions to the Draft EIR/EIS. Revisions to the Draft EIR/EIS are shown as indented text. New text is double-underlined; deleted material is shown with ~~strikethrough~~ text.

## 3.2 PROJECT DESCRIPTION

The comments and corresponding responses in this section cover topics in Chapter 2, *Project Alternative/Project Description*, of the Draft EIR/EIS. These include topics related to:

- PD-1: Density and Height
- PD-2: Housing Unit Locations
- PD-3: Commercial/Retail Space
- PD-4: Community and Open Space
- PD-5: Infrastructure
- PD-6: Project Construction Duration
- PD-7: Market Rate Housing on Public Land

### Comment PD-1: Density and Height

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)	I-Hunting	I-Sabre & Loura (1)
I-Cameron	I-Lee H	I-Sabre & Loura (2)
I-Dhillon	I-Marini	A-Commissioner Antonini
I-Fay (1)	I-Montalto (1)	
I-Fenili E	I-Montalto (2)	

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“Why can’t the buildings across the street on Wisconsin, between 25/26, step down the hill in such a manner that they start at curbside as low buildings? Why would the planners not even grant us that consideration?” (Lee Abel, letter, January 4, 2015, [I-Abel (1)])

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“Speaking of increase, the plans call for up to 1,700 units, and the units look to be built very dense with interior courtyards and very little outside space. The mature trees currently helping process the pollution will be ripped out. I share with my neighbors their concerns that the build is way too dense for Potrero Hill, that there is not enough open space, and that trees should be preserved whenever possible.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“Insufficient Housing: The purported reason for why the public must sacrifice so much free land, money and public views over to this private developer is because they are providing below-market housing. The number of units they have proposed here is a drop in the bucket. The unit density could double, while simultaneously increasing the amount of green open space and reducing auto trips, if only smart design were deployed.” (*Reynolds Cameron, email, January 7, 2015 [I-Cameron]*)

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“Members of the San Francisco Planning Commission (and the SF Political Establishment):

I write to express strong opposition against the currently proposed BRIDGE Housing concept for Potrero Hill. There are several bases for my objection, which include:

- Blocking the public vista from the Potrero Hill Recreation Center (PHRC)
  - Providing inadequate public benefit
  - Providing insufficient housing density
  - Auto-centric streetscape
  - Misappropriation of the public purse
  - Wasted opportunity to build a transformative project that would improve San Francisco for generations” (*Reynolds Cameron, email, January 7, 2015 [I-Cameron]*)
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“I urge the Planning Commission to consider that higher density will improve the social atmosphere because it will increase populations (thus increasing amenities) and as the plan shows, will create open space and active social areas. As a student of Crime Prevention Through Environmental Design (CPTED) I believe the increase and mix of populations within the design structure will help to reduce criminal activity.” (*Jennifer Dhillon, letter, January 6, 2015 [I-Dhillon]*)

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“F. Addressing these concerns, we recommend that the Rebuild Potrero project be limited in size to 1,700 number of units, allowing for increased open space, recreational areas, landscaping, and off street parking.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“That being said, I believe that the current project scope over-reaches in an attempt to maximize units in the space vs. making it a truly functional addition to the neighborhood. You aren’t just talking about 1,100 more units but potentially 5,000+ more residents in a part of town without the infrastructure to support it. Potrero Hill has a neighborhood feel and while I think the change will be good I think modesty has it’s merits here.” (*Eduardo Fenili, email, January 5, 2015 [I-Fenili E]*)

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“The scope of the project is very large and many aspects of it are thoughtful. However, the proposed buildings on 23rd Street between Arkansas & Wisconsin Street will make the area feel too dense with buildings that are too high.” (*Homer Lee, letter, January 4, 2015 [I-Lee H]*)

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“Height and Density: The plans do not fully address the environmental and social impact of the tall, dense dwellings which are inconsistent with existing architecture of Potrero Hill, and appear inconsistent with City policies and mandates regarding hilltop open space, public parks, and vistas.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“If this project is allowed to go forward I believe the quality of life on Potrero Hill will be severely impacted. The proposed project is way out of scale both in density and height limits for Potrero Hill. As a close neighbor to the project I have concerns in regards to construction phasing spanning 10 years or longer.” (*Dennis Montalto, letter, January 4, 2015 [I-Montalto (1)]*)

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“The proposed development is too dense and too high, obliterating existing views and increasing traffic congestion beyond tolerable levels.” (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

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“We ask that you consider the concerns we have raised about safety and the crushing effect of excessive density in our Potrero Hill neighborhood. We are not opposed to progress. We are only opposed to blind progress.” (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

"I have some concerns with the projected number of units being built. I moved to Potrero Hill in 2003 and I moved there with the idea that I liked that it was not one of the most dense neighborhoods in the city. I think tripling the number of units that we have existing is exaggerated and I would like to see some kind of a compromise reached so that we won't have that many additional people living there. I would like to know, if all the new units were completely full with the maximum number of residents what that number will be, compared to the number of people that we have existing in the units that exist right now." (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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"We are in support of the Rebuild Potrero idea. We just do have some concerns about, one, the project density, going from the 600 to 1,700, seems -- the infrastructure, I just am a little concerned about that." (*Dennis Montalto, Public Hearing, December 11, 2014 [I-Montalto (2)]*)

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"I can't comment on the accuracy of the census tract in particular; we're just looking at the overall picture. The other thing that I think will need to be answered as I comments and responses is there were a lot of comments about the density, which, you know, is very appropriate in my mind if it's denser, but I think comparisons of the density in the areas surrounding the project area with the projected project density so that we have an idea of the differences in density -- it's not like -- Potrero Hill does have a variety of densities. It's not all just single-family homes. There are many parts of it who already have much denser parts. So that would be good to answer." (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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Response PD-1

These comments raise concerns regarding the density and associated height of the Proposed Project.

The project applicant designed the Proposed Project based on feasible placement of buildings on the site. The proposed buildings along Wisconsin Street between 25<sup>th</sup> and 26<sup>th</sup> Streets and along 23<sup>rd</sup> Street between Wisconsin and Arkansas Streets would reach a maximum height of 40 feet, the same height allowed under existing zoning. The increase in height at these locations of the Project site does not represent a significant increase over the height of existing buildings, with some currently reaching up to 34 feet. The buildings at the Project site would be designed to step back from the lot lines in order to reduce massing from the street level.

As discussed on page 4.2-2, *Land Use and Land Use Planning*, of the Draft EIR/EIS, most residential buildings in the Project vicinity are two to four stories tall with typical heights ranging from approximately 25 to 35 feet. The Project would request a Height and Map Amendment to change the

height and bulk designations for portions of the site that are proposed above 40 feet. As discussed in Section 5.2, *Land Use and Land Use Planning*, of the Draft EIR/EIS, the Project would be consistent with existing character of the neighborhood. The proposed height amendment and rezoning do not, by themselves, constitute a significant impact. However, the proposed increase in height and bulk could result in impacts related to a variety of physical impacts such as those related to aesthetics, wind, or shadow. With regard to aesthetics, as discussed in Section 5.3, *Visual Quality/Aesthetics*, aesthetics may no longer be considered in determining the significance of this Project's physical environmental effects under CEQA. After review of the public comments and commissioning a peer review of the original analysis in the Draft EIR/EIS, it was determined that aesthetic impacts under NEPA were less than significant with mitigation. As discussed in Section 5.11, *Wind and Shadow*, impacts related to wind and shadow were also determined to be less than significant.

The population-driven effects resulting from increased density of the Project are evaluated in Sections 5.4, *Socioeconomics and Community/Population and Housing*; 5.7, *Transportation and Circulation*; 5.8, *Noise*; 5.9, *Air Quality*; 5.10, *Greenhouse Gas Emissions*; 5.12, *Recreation*; 5.13, *Utilities and Service Systems*; and 5.14, *Public Services*. Ultimately, the Draft EIR/EIS demonstrates that with the exception of operational noise, impacts to two Muni lines, and cumulative impacts to four intersections, no other environmental impacts resulting from an increase in population at the site would result from implementation of the Proposed Project.

One commenter's desire to limit the size of the Proposed Project to 1,700 units is noted. This unit count is the maximum studied in the Draft EIR/EIS, and additional units beyond those studied in the Draft EIR/EIS could not be developed without further CEQA and possibly NEPA review.

A comment was received suggesting additional density at the Project site. An additional comment was received indicating that an increase in population will help reduce crime in the Project area. These comments have been noted and will be forwarded to decision makers as part of this document process; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

The Draft EIR/EIS evaluates a Reduced Development Alternative (Alternative 1) which would not exceed 40 feet and would result in a maximum unit count of 1,280. This Alternative could be identified as the preferred alternative by the Planning Commission if they desire.

### Comment PD-2: Housing Unit Locations

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Fay (1)  
I-Fay (2)

I-Gudmundsson (1)  
I-Gudmundsson (2)

I-Marini  
I-O'Rourke

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“DIVERSITY OF INCOME LEVELS AND OWNERSHIP THROUGHOUT THE DEVELOPMENT. We understand the pride and opportunities inherent with home ownership and the benefits ownership has on families and entire communities.

A. We strongly believe that for the development to become a thriving environment for families of all kinds, each area of the development should offer a mix of affordable housing and ownership opportunities so that people of all income levels can become invested in their community. We think that any segregation between tenants and owners, if allowed within the development, will result in fractured zones in which lower income residents would become isolated and less invested in the success of the community.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“MIXED INCOME HOUSING. I strongly feel unless we have this, this new neighborhood will never coalesce into the one envisioned in the Rebuild project.” (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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“(For brevity the following omits appreciation for many well done parts of the Draft EIR).

It appears that the authors of the Draft EIR (DEIR) have, in regards to one fundamentally important aspect, “lost sight of the forest from the trees”. Recall that a fundamentally defining aspect<sup>1</sup> of the Proposed Project is to integrate residents of low-income housing with the larger community. Furthermore, “socioeconomics and community” is a specified category of review, yet the DEIR does not define and hence not review where exactly the 606 low-income housing units will be located<sup>2</sup>.

This may be an unfortunate omission since the developer isn’t sharing that information anymore, but there exist previously disclosed plans by the developer that will create high-density “mini projects” within the redevelopment area. What I am referring to are master plans shared in public meetings around 2010 that showed, for example, the whole block in the south-west corner of the redevelopment area as being only composed of low income housing units. The rest of the low income housing units are then similarly clustered together in two other clusters. This goes against the fundamental premise of increasing the overall population density in order to allow the low-income housing units to be integrated with the larger community.

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<sup>1</sup> See bullets two and three in “Project Objectives” (section 1.3.2, page 100 counting from first page in pdf file).

<sup>2</sup> Figure 3 in Appendix 1 shows where “affordable opportunities” will be located. But this “affordable opportunity” category is now presented as a mixture of the 606 low income housing units and other additional affordable housing and there is no way to identify, and hence review, where exactly the 606 low income housing units will actually be.

Appendix 1 in the DEIR shows numerous letters received from people expressing that a DEIR should address this. Also, Bullet three on page 34 in the DEIR itself even mentions this as a “known controversy”, yet the DEIR does not address it. But this cannot be avoided, a final EIR can only be complete with the exact locations of the 606 low income housing units defined in a diagram along with a complete socio-economic impact analysis of the proposed locations.

If this reveals that the plan is indeed to have, e.g., a full block in the south-west corner of the development area to become essentially a new high-density “mini project”, then the impact analysis should also address honestly the full socio-economic impact of creating new high density low-income clusters. It should also address the impact on the Parkview Heights community to get a whole block’s worth of high-density low-income housing on its doorsteps.

A list of frequently asked questions (FAQ) encountered by the author of this letter:

1. What plans “shown in public meetings around 2010” is this letter referring to?
  - o The plan showing the south-west block of the redevelopment area as being only composed of low-income housing was shown to the author and many other residents of Potrero Hill in public “Rebuild Potrero” meetings in -2010. The specific diagram showing this was available online at some point, but not for the past -2 to years. The developer needs to be confronted to make this diagram public again, and available to the EIR authors so that they can review it.
2. Why would the developer want to cluster the low-income housing units into separate high-density “mini projects” within the redevelopment area?
  - o Most likely to make it easier to sell or rent market rate units to prospective customers that would be repelled by being close to low income housing units. Any such schemes will however be exposed in due time and it is best for all parties to prevent such manipulation, and associated repercussions, now during the planning stage.
3. What is the ideal solution to this problem?
  - o The ideal solution is to have the low-income housing distributed throughout the whole development. This dissipates multiple concerns and provides the economic and social integration that is the underlying reason for the overall population density increase being pursued. If that is not possible, then all Potrero Hill residents are probably best served with Reduced Development alternative 2, i.e., to just rebuild the existing buildings.
4. Is the ideal solution possible?
  - o The DEIR states (page 910) that “[low income housing will be] under management by and the ownership of the project applicant or related entities.” This makes it clear that the low-income units will be owned and managed by the owners/managers of all the units, and that the low-income units do not have to be segregated from the other units from an



ownership/management perspective.” (*Dadi Gudmundsson, letter, December 15, 2015 [I-Gudmundsson (1)]*)

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“Segregation Based on Income Levels: Though the project purports to provide economic diversity, the clustering of the low income units in the south side is inconsistent with best practices in contemporary, mixed-use housing development and perpetuates segregated communities similar to mid-century public housing models (or, at worst, South Africa apartheid). It is incomprehensible how such a plan would be developed and approved in San Francisco, particularly when similar public housing developments have fostered crime, filth, and adversity among City residents. Other models, which integrate and disperse low income units throughout the entire development must be considered to ensure harmony, equity, safety, and fairness for all of our residents. We do not need “separate, but equal” facilities in our progressive compassionate City.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“7. I note that the plan calls for a maximum of 603 subsidized housing units. This is the bare minimum to replace the existing units. Not even ONE new subsidized unit! Surely, now would be a good time to add some additional subsidized units. I think that a project of this scope that hopes to add over 1,000 additional units could find the money to add some more subsidized units. I proposed an increase of 10%, 60 more subsidized units. I also support my neighbors who call for these units to be distributed evenly throughout the new development, not concentrated in one block.” (*Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke]*)

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“It appears to me that the authors of this report have, in PD-2 regards to one fundamentally important aspect, lost sight of the forest from the trees. What I’m referring to here, that this fundamental defining aspect is that we’re increasing the density of this area, massively, to integrate low-income housing with a greater community. That is -- if I’m not mistaken, is one of the core reasons for this controversial density increase. So -- and there is no -- the report doesn’t really define -- and hence, not review -- where, exactly -- and I say the word “exactly” -- the 606 low-income housing units will be located within this area. So this may be an unfortunate omission because the developers aren’t sharing that information anymore. But there exist previous disclosed plans that I’ve seen in public meetings that show the entire -- well, the southwest block yards from where I live, incidentally -- will only be composed of low-income housing units.

This is, essentially, a new high-density project, microproject, within the larger area. Of course then there are other -- two other clusters as well. And I think this goes against the fundamental premise of

increasing the overall population density in order to allow the low-income housing units to be integrated with the larger community.

The appendix shows -- to the reports, shows numerous letters received commenting on this, the report mentions that is a known controversy, but, still, it is not addressed adequately. But it cannot be avoided.

A final EIR can only be complete with exact locations of the low-income housing units defined in a diagram, along with a complex socioeconomic impact analysis of the proposed locations.

If this reveals that there is, indeed, the idea to create little micro high-density clusters, then the impact analysis of going to that -- and might even go into the community that I live in, Parkview Heights, which is a HOA with 200 units, and we would suddenly get a cluster -- high-density cluster of low-income housing right on our doorsteps.

This needs to be considered.

This has been sent in a letter that will be received. In the back of the letter there are also questions that I've frequently been encountered, such as what are these plans, why is the developer doing this, what is the ideal solution to the problem, is the ideal solution possible?" (*Dadi Gudmundsson, Public Hearing, December 11, 2014 [I-Gudmundsson (2)]*)

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Response PD-2

These comments raise concerns regarding the location of low income and market rate housing units on the Project site. One of the objectives of the Proposed Project is to create an economically integrated neighborhood with new public housing units, affordable rental apartments, and market rate and/or rental homes. The mix of units is discussed in detail in Chapter 2, *Project Alternatives/Project Descriptions*, on pages 2-6 through 2-8, of the Draft EIR/EIS. As shown, the Proposed Project would provide up to 100 affordable senior units, up to 970 affordable family units, and up to 630 market rate units. The placement of affordable housing and market rate housing has not yet been finalized. The intention is to provide a mix of housing throughout the site.

Final geographic distribution of the various types of housing units would depend upon the alternative selected and the final Development Agreements. Furthermore, HUD regulations protect the identity of Section 8 recipients from public disclosure; hence disclosure of the specific locations for public housing might run afoul of that mandate. The Draft EIR/EIS considers the total increase in number of units proposed on the site and evaluates that total increase against thresholds of significance for various environmental topics. None of the environmental topics evaluated under either CEQA or NEPA requires identification of where the Project site public, affordable, or market rate housing would be located in order to draw conclusions.

A comment was received regarding increasing the number of public housing units on the Project site. This comment, as well as those expressing concern over the specific location of public housing on the Project site, have been noted and will be forwarded to decision makers as part of this document process; no further response is required as these comments do not address the adequacy of the Draft EIS/EIS.

### Comment PD-3: Commercial/Retail Space

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Fay (2)	I-Marini	I-Zen
I-Lee R (1)	I-Serwer and Dreschler (1)	O-Rebuild Potrero
I-Lee R (2)	I-Serwer and Dreschler (2)	A-Commissioner Antonini

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“6. MORE RETAIL SPACE AND FARMER’S MARKET: Many studies have shown that retail business bring neighborhoods together. Small restaurants, coffee houses, grocery stores and most of all a Weekly farmer’s Market would really knit the various incomes together. Especially one’s that have food booths, music and small eating areas.” (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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“5) Retail Space. Problem: Given the increase in density, there does not seem to be a corresponding increase in services, as there is a very small retail zone planned for the center of the project area. Currently, this portion of Potrero Hill is very under serviced, requiring trips out of the area for groceries, shops, restaurants, etc. There is currently planned only a tiny bit of retail on one side of a block or two near the central park area.

Proposed Solution: The plan should include ground level retail shops on \*most\* streets to accommodate grocery stores, coffee shops, and restaurants within walking distance of most residents.” (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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“Lack of Commercial Services on the South Side: Though the plan touts additional commercial space, in reality, the south side lacks any possibility of stores, restaurants, cafes, libraries, or any type of public gathering spaces which could contribute to a vibrant community. The absence of such services, combined with the steep terrain, will result in isolated individuals, families and groups, which is unhealthy and regressive.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“In order to enhance the security and economic diversity of the new neighborhood, I strongly encourage increasing of the commercial square footage to 50,000 Square Feet from 15,000 Square Feet. I believe that the increase of commercial use space, will add needed vibrancy and pedestrians to the streets to inhibit criminal behavior, which can only elevate the overall quality of life. Not to mention, that the neighborhood could become less car reliant, provide jobs, and thereby be much more sustainable. It might even become a destination for residents from other parts of the city as well.”  
*(Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)])*

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“In addition, the additional community center retail space is another great amenity that people are looking forward to.

On that side of the hill obviously there’s not a lot of places for people to go to. And on top of that, some residents have also expressed to me with the new retail and other opportunities they also feel that they may have a chance to start their own business or somehow participate in that and really see it as an upward movement for themselves and for everybody in the community. So we encourage you to support the project so that everyone’s quality of life can be improved in the area. Thank you.” *(Thu Banh-Rebuild Potrero, Public Hearing, December 11, 2014 [O-Rebuild Potrero])*

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“I would like to see an increase in the amount of retail space that’s being planned for the project because I think that if there are more services in that area it will make it less likely that people feel the need to leave and come into the area and that will help reduce the amount of traffic in and out of the rebuilt area.” *(Richard Lee, Public Hearing, December 11, 2014 [I-Lee R (2)])*

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“Oh, okay. And then there are more retail space and shops, so we can -- we can be out on the street and, you know, spend more time on the street and shop.” *(Ms. Zen, Public Hearing, December 11, 2014 [I-Zen])*

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“And of course the inclusion of retail is very important, and the open space.” *(Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini])*

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Response PD-3

These comments raise concerns regarding the amount and location of commercial and retail space proposed. A comment was received outlining the neighborhood benefits of providing local retail services. This comment has been noted and will be forwarded to decision makers as part of this document process; no further response is required as the comment does not address the adequacy of the EIS/EIS.

The Project includes 15,000 square feet of retail uses to be developed along 24<sup>th</sup> Street between Arkansas and Missouri Streets and at the corner of 25<sup>th</sup> and Connecticut Streets. The primary objective for the Project is to create an economically integrated neighborhood with new public housing units, affordable rental apartments, and market rate and/or rental homes. The intent of the Project is not to provide a substantial amount of new retail uses. The amount of proposed retail space is based on the project applicant’s assessment of how much space is marketable and financially viable. Further response is not necessary as the desire for additional retail is not a comment on the adequacy of the Draft EIR/EIS.

Comment PD-4: Community and Open Space

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

- |            |            |                         |
|------------|------------|-------------------------|
| I-Abel (1) | I-Fay (2)  | I-Zen                   |
| I-Abel (2) | I-Heath    | O-Rebuild Potrero       |
| I-Cameron  | I-O’Rourke | A-Commissioner Antonini |
| I-Fay (1)  | I-Robbins  |                         |

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“I am also concerned about the lack of open space in the plan, yet see how they mention the Starr King Open Space as bordering on the project. In reading between the lines, it seems they expect the current open space to support a massive influx of people. This is all good and fine as a marketing device to get market rate folks to buy or rent, but the Starr King Open Space does not get government funding and is in desperate need of money to repay for the sidewalks being fixed. Might the City or the builders consider donating to the SKOS so that it can remain a community space? As I understand it, if the Board does not come up with the money to repay the city for fixing the sidewalks that border it, the city could take back the open space, could even build on it. We NEED our open space and we need funding help so that it is accessible to all who currently live on the Hill, as well as to all those who will be moving in soon. I can provide you with more information on this.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“Inadequate Public Benefit: While the proposed project does include nominal public space and a few retail units, it fails by modern design standards to address the needs of this project. In light of the recently-publicized “DropBox soccer bros in the Mission” You Tube incident, it is evidently clear that the east side of The City is in dire need of more soccer fields. A rather simple solution would be to build a grade-level rooftop soccer field along 23rd Street, with residential and commercial units below. Several examples of both soccer fields on rooftops, as well as smart use of public space have been demonstrated around the world. Given the degree to which this project is subsidized by the public taxpayer, we should expect a public benefit out of it. For more info on this subject, please look to architects like Bjarke Ingels (BIG), and many others.” (*Reynolds Cameron, email, January 7, 2015 [I-Cameron]*)

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“QUALITY OF ENVIRONMENT: We believe that the proposed amount of open space and leisure areas within the development is inadequate for a vibrant, thriving, community of its size. We also feel that it is important to keep the open, neighborhood environment that makes Potrero Hill a unique area of the city.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“GREEN SPACE. Increase by one acre. Grass in the new environment we have today is very water intensive. Please consider some other more native variety that will use less water.” (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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“5. LESS COMMUNITYSPACE. The report states there will be 15,000sq. ft. for this purpose and 50,000 sq. feet for a community center. Currently we have 2 community centers that are actively used. Since most new neighbors will be working we don’t need that much sq. ft. for a community center. Please reconsider and have less community space and more retail.” (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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“I urge the Department to consider reduced heights and density on the western side of the project by perhaps increasing density lower on the slope. I believe that including publicly accessible open space, as a park at the top of the hill, would better serve the public realm, as well as providing enhanced recreational opportunities for all residents.” (*Alison Heath, email, January 6, 2015 [I-Heath]*)

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"10. With all the open space allocated within the development, I hope it will be possible to allocate some for a small fenced in dog parklet or two. I do not see any outlined in the report." (*Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke]*)

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"c. There is no mentioned of creative open space designs to develop open space and capitalize on public views, not block the only ones we have now!" (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"They are also very excited about the opportunity of additional open space and parks and places where they can take their children and families. Right now there really is a scarcity of those types of locations and safe locations in order to do that." (*Thu Banh-Rebuild Potrero, Public Hearing, December 11, 2014 [O-Rebuild Potrero]*)

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"Mostly concerned about the open space. And specifically on the maps I've seen Starr King open space, which is on the other side of Starr King school. They're showing how, "Well, I that's just right across the street from the new rebuild. Won't that be great?" Yeah, that will be great. It's a wonderful open space. But it can't be the major open space of the project. There's only 2.5 acres of open space in the project and the Starr King is larger than that.

They need funding to fix the sidewalks. They need some help. That's going to be the space that people are gonna go into. And perhaps they could take that into consideration and help out with Starr King open space. Thank you very much." (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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"And there are more extracurricular activities and space for recreation for the children." (*Ms. Zen, Public Hearing, December 11, 2014 [I-Zen]*)

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"And of course the inclusion of retail is very important, and the open space." (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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Response PD-4

These comments raise concerns regarding the amount of location of open space and community space on the Project site. The Proposed Project would incorporate approximately 7.12 acres of public and private open space. Of the 7.12 acres of open space, approximately 3.62 acres of public open space would be provided. The open space components are detailed in Chapter 2, *Project Alternatives/Project Description*, on pages 2-10 through 2-13, of the Draft EIR/EIS. The Proposed Project would also include 15,000 square feet of retail/flex space and 35,000 square feet for a Community Center.

As discussed in Section 5.12, *Recreation*, of the Draft EIR/EIS, the Proposed Project seeks to include both private and common open space areas for use by Project residents. It is likely that residents of the Project would also use the Potrero Hill Recreation Center, adjacent to the Project site. Additional nearby public recreational facilities include Jackson Playground and McKinley Square Park. It is anticipated that, in addition to the use of the proposed open spaces provided at the Project site, increased use of existing recreational facilities would be spread out among several parks in the area. The analysis presented in Section 5.12 does not assume that Project residents would use Starr King facilities. The Project would not cause the parks-per-population ratio to change substantially from its current level of 5.08 acres per 1,000 residents, and the Project would not result in a substantial City-wide increase in the demand for or use of recreational facilities.

A comment was received suggesting that soccer fields be placed on the rooftops of buildings proposed along 23<sup>rd</sup> Street. The project applicant has determined that this feature is cost prohibitive and would not be technically feasible using the proposed site configuration. In terms of providing other community benefits, the proposed Community Center would include a computer lab, community meeting room, family support center, and senior center.

Open space developed at the Project site would adhere to the Water Efficient Irrigation Ordinance which applies to all residential, commercial, municipal, and mixed-use projects installing or modifying 1,000 square feet or more landscape area. Projects must design, install, and maintain efficient irrigation systems, utilize low water-use plantings, and set a Maximum Applied Water Allowance, also known as the annual water budget.

One commenter suggested including open space at the top of the hill. As indicated in Figure 2-2 of the Draft EIR/EIS, several open space areas are located in the northern portion of the Project site. Many of the planned locations take advantage of existing view corridors. In terms of providing a fenced dog play area, the final programming of the open spaces is not complete and would be determined prior to development of whichever alternative is selected.

Additional comments were received suggesting that one additional acre of open space be provided and that less community space be provided. Further response is not necessary as the desire for additional open space and/or less community space is not a comment on the adequacy of the Draft EIR/EIS.



New sidewalks would be provided throughout the Project site. There are no plans to repair adjacent offsite sidewalks since there is no nexus between the impacts of the Proposed Project and the existing conditions of sidewalks in the neighborhood.

#### Comment PD-5: Infrastructure

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

*A-SFPUC*

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“General Comments: The SFPUC holds several water and sewer easements within the project area, and existing water main alignments are under proposed buildings. If the project area is reconfigured as proposed in the draft EIR, the SFPUC strongly prefers to have its utilities located within the public right of way rather than within easements. Any vacation of existing easements must be executed in accordance with City of San Francisco (City) and SFPUC standards.

Any work within existing SFPUC easements requires SFPUC review and approval by the SFPUC Real Estate Services Division and Wastewater Enterprise.” (*San Francisco Public Utilities Commission, letter, January 6, 2015 [A-SFPUC]*)

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“Chapter 2 Comments. Page 2-14, Paragraph 2: This section discusses landscaping, including planting of trees as part of the project. Please be advised that the SFPUC General Manager Order for Surface Improvement Projects states that trees are not allowed above or within five feet of the outside diameter of wastewater assets or lateral vents.

Page 2-15, Paragraph 3: This section describes potential for widening of sidewalks. Please be advised that the SFPUC General Manager Order for Surface Improvement Projects includes the following requirements concerning sidewalks:

- 1) Proposed curbs and gutters are not allowed within three horizontal feet of the outside diameter of existing parallel linear wastewater assets such as pipes.
- 2) Proposed curbs and gutters are allowed to cross subsurface wastewater assets.
- 3) Proposed curbs and gutters are not allowed within three horizontal feet of any existing manhole structures.

Also, should proposed sidewalk widening and/or bulbout be located above sewer laterals, the following would apply:

- 1) The project sponsor shall relocate the sewer lateral air vent and trap to conform with San Francisco Department of Public Works standard plan 87, 196 and replace the upper lateral from the vent to the property.
- 2) The project sponsor shall notify all adjacent property owner(s) of their increased responsibility for the sewer lateral(s). The project sponsor shall send a copy of the notification to SFPUC Wastewater Enterprise, Collection Systems Division (WWE/CSD).” (*San Francisco Public Utilities Commission, letter, January 6, 2015 [A-SFPUC]*)

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“Any new public sewer infrastructure (lower laterals, catch basins, culverts, mains, manholes, etc.) to be developed shall be submitted for review and approval by SFPUC-WWE/CSD. All sewer infrastructure shall comply with applicable City standards. Please contact SFPUC-WWE/CSD at sewerinspections@sfwater.org for review.” (*San Francisco Public Utilities Commission, letter, January 6, 2015 [A-SFPUC]*)

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Response PD-5

These comments raise concerns regarding proposed infrastructure at the Project site. As discussed in Chapter 2, *Project Alternatives/Project Description*, page 2-16 and 2-17 of the Draft EIR/EIS, the Proposed Project would upgrade and resize water, wastewater, gas and electric, and other utility infrastructure within the Project site, as necessary. All onsite utilities would be undergrounded as part of the Proposed Project. As discussed on page 2-14 of the Draft EIR/EIS, all existing trees would be removed from the Project site and replaced/replanted as part of the Proposed Project development. Page 2-15 of the Draft EIR/EIS states that sidewalks within the Project site would be built with a width of 5 to 14 feet and would be provided along all blocks of the Project site for pedestrian safety, walking comfort, and convenience. In addition, pedestrian bulb-outs and sidewalks with a width of at least six feet would be provided at intersections to improve the walking experience.

The Project applicant would work with the SFPUC to relocate utilities in a mutually agreed upon location. Further, Project elements would be designed and located to conform to SFPUC standards, including the SFPUC General Manager Order for Surface Improvement Projects and review and approval procedures. This comment has been noted and will be forwarded to decision-makers as part of this document process; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

## Comment PD-6: Project Construction Duration

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Hunting

I-Montalto (2)

A-Commissioner Johnson

I-Montalto (1)

A-Commissioner Antonini

A-Commissioner Moore

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“If this project is allowed to go forward I believe the quality of life on Potrero Hill will be severely impacted. The proposed project is way out of scale both in density and height limits for Potrero Hill. As a close neighbor to the project I have concerns in regards to construction phasing spanning 10 years or longer.” (*Dennis Montalto, letter, January 4, 2015 [I-Montalto (1)]*)

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“I think 10 years is a very long time to ask neighbors to be patient with a reconstruction project. I would appreciate very much if there could be some kind of a compromise struck with that proposal as well. I would like to see less time in construction.

On 25th Street, where I live, the wind blows from west to east, generally. It brings all the trash and garbage over the hill and onto our street. I would also appreciate that that be taken into consideration and perhaps you could put some kind of a plan in place to help keep our part of the neighborhood clean during the construction process.” (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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“Secondly, the mitigation, a 10-year project, we’re in the wind path of anything that goes on up there. The wind, almost every day, blows from west to east. So I would like to see that addressed so that the people that live there -- there’s quite a few people that live south and east of this project, and I’m just a little concerned about that. Ten years seems like a long time for a project to take place. Thank you very much.” (*Dennis Montalto, Public Hearing, December 11, 2014 [I-Montalto (2)]*)

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“However, I have a couple of questions, which I believe need to be elevated. It’s in the area of construction impacts.

With funding for a project which has large public components, I think only focusing on construction impacts over a finite time frame of 10 years is potentially dangerous because, as you extend some of the construction impacts over more than 10 years, it becomes almost a generational issue that people basically live in a continued construction site.

This is exacerbated by extremely difficult grading conditions, which, on their own, require a large amount of cut and fill, and I'm not even talking about air quality and noise, two areas where I think the City has a lot of experience with, but the constant need for a large area, the perimeter of this site is huge, people feeling that it's never finished.

Can we get certainty about the public funding aspects as they effect construction impact, is there certainty about how the project can reasonably phase and what commitments can we bring to the front table in an EIR to say this will happen in X, Y, Z.

Most construction projects of this size take significantly longer than 10 years. We all know that. There is Bayview-Hunters Point, there is Treasure Island and on and on and on. All of them have public components, all of them have difficulties comparable to what we have in front of us here.

It is for this very reason, myself having worked on these things for the last 9 years, that I ask you to be very conservative in how you set finite time frames for construction impact and comment on them.

It might be a larger issue to examine, and even if there is deferral to other things, I think the EIR/EIS needs to be very clear and precise for this type of an important project." (*Commissioner Moore, Public Hearing, December 11, 2014 [A-Commissioner Moore]*)

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"I think it's—you know, the report is good. I think we have to talk a little bit about the phasing of the plan and a little bit more detail about how it's going to reach its goal, as Commissioner Moore was talking about, in the ten-year period of time.

But I think, from my understanding, the fact that it's being done together over a finite period of time makes it more efficient because for this project to work we need to have all the parts of it. It's not going to work if there's just a part of it. We need to get the financing and it's going to provide economic and physical integration in a neighborhood which was segregated from the very beginning from the rest of San Francisco and the articulation of that neighborhood into the San Francisco grid, which will be a big improvement." (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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"I just have a couple of questions. I echo some of Commissioner Moore's comments about construction impacts and the length of time in which they are going to be considered.

Ten years is a wide enough berth that you have to think that there might be impacts that are going to linger after that, even after the last unit is built." (*Commissioner Johnson, Public Hearing, December 11, 2014 [A-Commissioner Johnson]*)

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## Response PD-6

These comments raise concerns regarding to the Proposed Project's construction duration and construction-related impacts on the surrounding, existing community. As discussed in Chapter 2, *Project Alternatives/Project Description*, on pages 2-17 through 2-19 of the Draft EIR/EIS, Project construction would occur in three non-overlapping phases spanning approximately 10 years (from about 2015 to 2025) or longer. The three phases of Project construction correspond to different areas of the Project site to minimize disruption to existing residents. These phases are shown in Figure 2-5 of the Draft EIR/EIS and are described below:

- **Phase 1** consists of the vicinity south of 25<sup>th</sup> Street in the existing Potrero Terrace portion of the Project site. Phase 1 is anticipated to last approximately 26 months with streets closed for approximately eight months.
- **Phase 2** consists of the area between 23<sup>rd</sup> Street and 25<sup>th</sup> Street, or the remaining portions of the existing Potrero Terrace site. Phase 2 is anticipated to last 48 months with streets closed for approximately 12 months.
- **Phase 3** includes the development of the entire existing Annex site. Phase 3 is anticipated to last 48 months with street closed for approximately 12 months.

As disclosed in the Draft EIR/EIS, the Proposed Project would result in significant impacts during construction to the following environmental topic areas: visual quality/aesthetics, cultural and paleontological resources, transportation and circulation, noise, air quality, biological resources, and hazards and hazardous materials. All construction-related impacts would be reduced to a less-than-significant level with incorporation of the proposed mitigation measures except for construction-related impacts to air quality (violate air quality standard during construction) which would remain significant and unavoidable. Please see Response NO-1 for a discussion of construction period noise impacts, Response AQ-1 for a discussion of construction period air quality impacts, Response AQ-2 for a discussion of sensitive receptors and health risks associated with project construction, and Responses HZ-1 through HZ-3 for a discussion of construction period hazardous materials emissions, asbestos and lead, and the Dust Control Plan.

Some comments express concern regarding trash generated during project construction and wind impacts on construction-generated trash. Improvement Measure IM-AE-2a, as described on page 5.3-10 of the Draft EIR/EIS requires all construction contractors to strictly control the staging and cleanliness of construction equipment and staging areas. The project contractors would be required to sweep surrounding streets used for construction access to keep them free of dirt and debris.

A few commenters expressed uncertainty that Project construction would be completed within the anticipated 10-year timeframe. These comments express concern regarding limiting the analysis of construction impacts over a finite 10-year construction horizon. The analysis presented in the Draft EIR/EIS is based on the construction estimate provided by the project applicant based on experience with other similar large-scale construction projects. There is no evidence suggesting the project

construction period would extend beyond the 10-year construction horizon and thus the Draft EIR/EIS need not conduct an analysis of construction-related impacts beyond 10 years.

Additionally, one comment expressed concern regarding the certainty of public funding and potential construction phasing impacts (delays) that could extend the construction period. This comment has been noted and will be forwarded to decision-makers as part of this document process; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

For a development such as this, detailed construction plans are reviewed by the City agencies at the time the construction contractor applies for the building or site permit and not during the environmental review process, which does not require the same level of construction detail. The Planning Department, however, will review the plans submitted with the building permit to assure that the final construction plans are consistent with the project design approved by the Planning Commission.

#### Comment PD-7: Market Rate Housing on Public Land

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Meroz

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“I am however concerned about the impact of the market-rate housing construction described in the EIR, on public vistas, and question the use of public land and resources for the construction of for-profit housing.” (*Yoram Meroz, email, January 7, 2015 [I-Meroz]*)

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“The 65’ buildings are slated to contain market-rate housing. In effect, the unique views of this site will be permanently taken away from the public and sold to a select few who can afford to pay for them. This is an inappropriate use for land put in the public trust and intended to benefit the public. In addition, as the DEIR states, no comparable land exists in the city for the construction of subsidized housing. Any land used for market-priced housing on the site will permanently replace future potential sites for the construction of affordable housing. While alternative 1, as described in the DEIR, alleviates some of the visual impacts of the proposed project, it retains a large proportion of the site for market-rate apartments, which I consider a misuse of rare public land.” (*Yoram Meroz, email, January 7, 2015 [I-Meroz]*)

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Response PD-7

These comments raise concerns in regard to providing market rate housing on public land. The decision to develop the Project or its alternatives would be made within the statutory and regulatory framework required for such decisions. The comments have been noted and will be forwarded to decision-makers as part of this document; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

### 3.3 ALTERNATIVES

The comments and corresponding responses in this section cover topics in Chapter 2, *Project Alternatives/Project Description*, of the Draft EIR/EIS. These include topics related to:

- AL-1: Alternative 1
- AL-2: Alternative 2

Comment AL-1: Alternative 1

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Fenili E	I-Montalto (1)	I-Robbins
I-Fenili F	I-Raffel	I-Sundell (1)
I-Lee R (1)	I-Heath	I-Zwigoff

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“With that, I am writing to recommend Alternative 1 of the plan which calls for less units but uses the same foot print. I believe the only real change is removing the 65’ ceiling and keeping it 40’. Thank you for your consideration.” (*Eduardo Fenili, email, January 5, 2015 [I-Fenili E]*)

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“I frequently drive through the area in question and would love to see improvement while continuing to offer affordable housing for those in need. For this reason I’d like to express my genuine hope that Alternative #1 plan is passed.” (*Francesca Fenili, email, January 7, 2015 [I-Fenili F]*)

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“I urge the Department to consider reduced heights and density on the western side of the project by perhaps increasing density lower on the slope. I believe that including publicly accessible open space,

as a park at the top of the hill, would better serve the public realm, as well as providing enhanced recreational opportunities for all residents.” (*Alison Heath, email, January 6, 2015 [I-Heath]*)

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“6) Project Scope. Problem: Given the above traffic concerns, it seems that the project scope may be too large for this area, as it is poorly connected to the rest of the city due to existing geographical constraints, and there seems to be insufficient planning to make this a neighborhood in its own rights with local business services that would reduce the need for people to travel to other parts of the city.

Proposed solution: Reduce the scope of the project to a fewer number of units, such as Alternative 1.” (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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“I urge the commissioners to consider Reduced Development Alternative 1. I believe this plan is viable for Bridge to see a profit and lessen the impact of the proposed project.” (*Dennis Montalto, letter, January 4, 2015 [I-Montalto (1)]*)

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“Greetings, I am writing as a home owner at 1431 20th street to voice support for the Reduced Development Alternative #1 for Potrero Hope. Our neighborhood does not need even more development. We do not need more vehicles, etc. coming and going. Please do not increase the size of the development. And, in fact, reduce it.” (*Daniel Raffel, email, January 5, 2015 [I-Raffel]*)

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“Alternative 1 (Reduced Development Alternative). Unfortunately, the heights of the buildings in Alternative 1 are not provided, so I cannot accurately judge the impact of this proposal. However, in general the same points stated above would apply to Alternative 1 if the buildings rise more than 10 - 15 feet above street level.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“Without an ability to mitigate traffic, Hope SF must be required to pursue a Reduced Development Plan, which would have less of an impact on traffic. Notably, the effect of lower density on traffic was not detailed extensively in the report (they grade the impact between the main plan and Alternative 1 as similar). Any development should add to the general well-being of the community by including some provisions for alleviating traffic and public transport congestion, rather than just adding to the financial burden and to public expenditures. If the Project does not including any provision for helping



improve public transit usage and capacity and reducing congestion, it should not be as large.”  
(*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“I believe any of the following proposals would meet the city’s housing needs, meet the needs of the current community residents, and also provide an aesthetically pleasing public park and street environment for enjoyment by existing residents and residents to come:

1. Build shorter buildings at J-M. This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
  2. Build shorter building at J-M but build taller buildings further down the hill (e.g., Building A-H and X). This will allow the same degree of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at 65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents and future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco.
  3. Build the same height buildings but start at a lower height (do not terraform the land and add fill to bring up the height of the south side of 23rd Street). This will also not impact views from 23rd St. or the Potrero Hill Rec Center open spaces.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)
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“Please, please consider alternate 1. This is way too dense for our neighborhood. I support the new development...not the 60 foot heights or the density. Have lived on the hill over 40 years. Please consider the character of the neighborhood.” (*Carol Sundell, email, January 5, 2015 [I-Sundell (1)]*)

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“I would urge you to keep the height of this project within the 40’ norm.” (*Terry Zwigoff, email, January 5, 2015 [I-Zwigoff]*)

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Response AL-1

These comments are regarding Alternative 1, the Reduced Development Alternative. NEPA requires a thorough evaluation of the impacts and merits of all project alternatives, so that the “Proposed Action”

is identified at the conclusion of the environmental review, rather than at the outset. Unlike CEQA, which permits the evaluation of alternatives to occur in less detail than is provided for the proposed project, NEPA requires that alternatives be analyzed at a substantially similar level of detail as that devoted to the proposed project. All alternatives considered, including the preferred alternative (if any), must be evaluated compared to the “no-action alternative” future (without project). Thus, consistent with NEPA regulations, this joint document (Draft EIR/EIS) evaluates the Proposed Project and alternatives at an equal level of detail.

The Draft EIR/EIS considers three alternatives—the Reduced Development Alternative (Alternative 1), the Housing Replacement Alternative (Alternative 2), and the No Project Alternative (Alternative 3). The alternatives considered in the Draft EIR/EIS were selected based on the potential of each alternative to avoid or reduce significant impacts identified for the Proposed Project. The Draft EIR/EIS devotes substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative impacts and merits with the impacts and merits of the Proposed Project.

Alternative 1 would retain the same development footprint as the Proposed Project. This alternative would reduce the size of the proposed land uses, associated parking, and loading spaces as compared to the Proposed Project in order to lessen the impacts of the Proposed Project. Specifically, Alternative 1 would construct up to 1,280 residential units, 15,000 square feet of retail/flex space, 25,000 square feet of community space, and approximately 3.62 acres of public open space. Compared to the Proposed Project, fewer housing units and less community space would be developed under Alternative 1. In addition, the maximum building heights for Alternative 1 would not exceed 40 feet.

The Draft EIR/EIS identified significant and unavoidable impacts of Alternative 1 similar to the those for Proposed Project, for the following environmental topics: transportation (exceed transit capacity threshold, construction-related traffic impacts, cumulative intersection impacts, cumulative transit capacity impacts, and cumulative Muni screenline impacts), noise (substantial permanent increase in ambient noise), and air quality (violation of air quality standard and cumulative air quality impacts). Alternative 1 does not eliminate any environmental impacts associated with the Proposed Project.

Some commenters have suggested alternative density and height schemes beyond those analyzed under Alternative 1. As discussed below under Response AE-2, AE-3, and AE-3, a mitigation measure has been agreed to by the project applicant to reduce the height of buildings along 24<sup>th</sup> Street. With regard to comments suggesting an evaluation of density and height schemes beyond those analyzed, the project applicant has proposed a project and alternatives that it believes to be responsive to community sensitivity combined with what is financially feasible. The alternatives evaluated in the Draft EIR/EIS range from the buildout of 1,700 units to a rebuild of the existing buildings which would maintain the current unit count. This range of alternatives is considered reasonable, and therefore adequate, under both CEQA and NEPA. These comments will be forwarded to decision makers to assist with their deliberation on the Project. However, these comments do not address the adequacy of the Draft EIR/EIS and no further response is required.

These comments also generally state a desire for decision-makers to approve the Reduced Development Alternative (Alternative 1) for the purposes of reducing traffic impacts (through fewer project-generated trips). These comments are noted and will be considered by the decision makers prior to certification of the EIR/EIS and the granting of any project approvals. However, these comments do not address the adequacy of the Draft EIR/EIS and no further response is required.

## Comment AL-2: Alternative 2

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

I-Meroz

I-Robbins

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“Page 5.13-20, Paragraph 2: Regarding the sentence, “Alternative 2 would result the same water demand as existing conditions”, it appears that Alternative 2 would likely result in less water demand due to increased plumbing efficiencies with new construction.” (*San Francisco Public Utilities Commission, letter, January 6, 2015 [A-SFPUC]*)

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“With these points in mind, I urge that alternative 2 described in the DEIR be adopted, with a replacement of the existing housing.” (*Yoram Meroz, email, January 7, 2015 [I-Meroz]*)

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“Without an ability to mitigate traffic, Hope SF must be required to pursue a Reduced Development Plan, which would have less of an impact on traffic. Notably, the effect of lower density on traffic was not detailed extensively in the report (they grade the impact between the main plan and Alternative 1 as similar). Any development should add to the general well-being of the community by including some provisions for alleviating traffic and public transport congestion, rather than just adding to the financial burden and to public expenditures. If the Project does not including any provision for helping improve public transit usage and capacity and reducing congestion, it should not be as large.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“Finally, the EIS/EIR reads that NEPA requires that an EIS must: “[r]igorously explore and objectively evaluate all reasonable alternatives.” Given this requirement, I request that Hope SF complete another EIS/EIR to evaluate an alternative in which the views from our public spaces at 23rd St. and the Potrero

Recreation Center are not obstructed, and any assessed housing deficit is replaced with taller buildings further down the hill towards 25th.” (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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#### Response AL-2

These comments are regarding Alternative 2, the Housing Replacement Alternative. Please see Response AL-1 for a discussion regarding the evaluation of alternatives at an equal level of detail as the Proposed Project so that reviewers may evaluate their comparative merits with the proposed project. As part of the Housing Replacement Alternative (Alternative 2), all existing housing units at the Project site would be demolished and rebuilt using the same building pattern that currently exists. The existing site plan and street pattern at the Project site would be retained. As such, Alternative 2 would reconstruct 620 affordable housing units, a 35-space preschool center, a 15-space child daycare center, and associated residential parking facilities. This alternative would minimize the short-term construction impacts by limiting redevelopment to replacing the existing 620 public housing units on the same building footprint as currently exists.

The Draft EIR/EIS identified significant and unavoidable impacts of Alternative 2 for the following environmental topics: transportation (construction-related traffic impacts). Compared to the Proposed Project, Alternative 2 reduces the following environmental impacts associated with the Proposed Project to less-than-significant levels: land use and planning (physical division, plan consistency); socioeconomic and community (displacement effects); transportation (effects on levels of service, freeway segments, freeway ramps, transit capacity, screenline ridership, transit operations, street network, bus stops, pedestrian facilities, bicycle facilities, loading space demand, circulation, parking, site access and onsite circulation, and cumulative traffic/transportation effects); noise (permanent increase in ambient noise); air quality (air quality standard during construction), greenhouse gas emissions (cumulative greenhouse gas emissions); wind and shadow (wind effects, shadow effects on recreational facilities); recreation (effects due to increased use, effects due to construction); utilities and service systems (effects related to construction of new facilities, water supply); public services (capacity of public services); geology and soils (seismic effects, unstable geological units, expansive soils); and hydrology and water quality (water quality standards, groundwater, drainage, stormwater capacity).

In response to the comment noting Alternative 2’s reduced water demand due to increased plumbing efficiencies with new construction, page 5.13-20, paragraph 2 of the Draft EIR/EIS has been revised as follows:

As described in the Water Demand and Wastewater Discharge Technical Memorandum (included as Appendix 4.13), Alternative 2 would result in an incremental decrease in water demand compared to existing conditions due to increased plumbing efficiencies required by applicable sections of the Building Code ~~the same water demand as existing conditions.~~

Alternative 2 would not result in the need to construct new water treatment facilities or expand existing facilities beyond the ongoing improvements identified in WSIP.

This revision does not alter the analysis or conclusions of the Draft EIR/EIS. No further response is required.

Some comments stated a desire for decision-makers to approve the Housing Replacement Alternative (Alternative 2) due to the commenter's concerns of using public land for market-rate housing. Please also see Response PD-7 for a discussion of providing market-rate housing on public land and Response AE-3 for a discussion of public view concerns. This comment has been noted and will be forwarded to decision-makers as part of this document process; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

In accordance with CEQA and NEPA, the Draft EIR/EIS has thoroughly evaluated a range of Project alternatives. One commenter suggested that another EIR/EIS be prepared that evaluates a Project that would not obstruct views. Alternative 2 presents a scenario that would not result in increased height on the Project site, thereby resulting in no effect on views. As discussed below under Response AE-2, AE-3, and AE-3, a mitigation measure is proposed to reduce the height of buildings along 24<sup>th</sup> Street. However, the City and project applicant have not identified any additional feasible alternatives that warrant CEQA and NEPA evaluation.

### 3.4 LAND USE AND LAND USE PLANNING

The comments and corresponding response in this section cover a topic in Chapters 4 and 5, Sections 4.2 and 5.2, *Land Use and Land Use Planning*, of the Draft EIR/EIS. The topic is related to:

- LU-1: Neighborhood Character

#### Comment LU-1: Neighborhood Character

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-O'Rourke

I-Robbins

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"3. Chapter 4 of the EIR, figure 4.2.2 shows incorrect zoning for my block. It looks like the entire block on the north side of the street, across from the proposed development is zoned as NC-1 for Neighborhood Commercial use. In reality, only one building on this block is commercial, the convenience store at the corner of Arkansas and 23rd St. The other two buildings on this block are condominiums with parking garages fronting the street. I wonder how this significant error has

impacted the decisions made or to be made regarding the proposed construction across the street.”  
(Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke])

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“Section 4: Community integration, open spaces, and responsible development - The Proposed Project prioritizes the number of units (and perhaps profit) over incorporating the development into the existing neighborhood, encouraging open space, and including design elements consistent with modern and sustainable urban development. This is directly in contrast with SF planning goals.

I urge you to undertake a full review of the EIS/EIR and to ensure that the plans for the development are revised to ensure that the character, open spaces, views and light of Potrero Hill are protected.”  
(Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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#### Response LU-1

These comments raise concerns regarding the Proposed Project’s impact on neighborhood character and existing zoning. The Draft EIR/EIS includes Figure 4.2-2, Existing Zoning Districts, in Section 4.2, *Land Use and Planning* on Page 4.2-5. In response to this comment, Figure 4.2-2 was reviewed and determined to be accurate. In particular Assessor’s Block 4162, the block bound by Arkansas Street to the east, 23<sup>rd</sup> Street to the south, Wisconsin Street to the west, and 22<sup>nd</sup> Street to the north is accurately identified as RH-2 with exception of the southernmost area of this area, which is zoned as Neighborhood Commercial, Cluster (NC-1).<sup>3</sup> Per Section 710.1 of the City’s *Planning Code*, many of these districts have the lowest intensity of commercial development in the City, generally consisting of small clusters with three or more commercial establishments, commonly grouped around a corner, and in some cases short linear commercial strips with low-scale, interspersed mixed-use (residential-commercial) development. Housing development is permitted above the ground story. Although the area in question only includes one commercial establishment, the area is zoned by the City as NC-1. Therefore, Figure 4.2-2 in the Draft EIR/EIS is accurate and no edits are necessary.

The analysis of the Proposed Project (Chapter 5, *Environmental Consequences*, of the Draft EIR/EIS) discusses the impacts to the existing neighborhood and considers proposed open spaces and design elements. The effects on the existing character are analyzed in Section 5.2, *Land Use and Land Use Planning*, under Impact LU-3. As discussed on pages 5.2-6 through 5.2-7, the existing character of the vicinity provides a mix of uses, including residential, recreational, institutional, and industrial. The Proposed Project would construct housing units, neighborhood-serving commercial space, open space, and a Community Center. Development of the Proposed Project would be a continuation and

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<sup>3</sup> San Francisco Planning Department. 2015. “San Francisco Property Information Map.” Available at: <<http://propertymap.sfplanning.org/>>. Accessed February 19, 2015.

intensification of existing uses surrounding the site. Mixed-use development is common for typical residential neighborhoods in Potrero Hill and throughout San Francisco; therefore, the introduction of new mixed-use development on the site would not be considered adverse and development of the Proposed Project would result in less-than-significant impacts.

The Proposed Project would also provide several open space areas, as described on pages 2-10 through 2-14 of Chapter 2, *Project Alternatives/Project Description*. Proposed open spaces would include public parks, shared courtyards, and backyards/general open space. Several of these open spaces would be accessible to the public, including 24<sup>th</sup> Street Park (37,050 sf), Connecticut Park Terrace (23,670 sf), Squiggle Park (11,800 sf), 25<sup>th</sup> and Connecticut Mini Park (4,000 sf), Getaway Open Space (16,400 sf), the 23<sup>rd</sup> Street Stair (12,760 sf), and the Texas Street Overlook/Edible Garden (28,350 sf). As proposed, 24<sup>th</sup> Street Park would connect to the existing Potrero Hill Recreation Center (Recreation Center) through the proposed Connecticut Park Terrace, integrating the Proposed Project with the existing setting. Therefore, the Project would develop new open space areas and would create linkages to the surrounding community.

As discussed in Chapter 3, *Plans and Policies*, the Proposed Project would be generally consistent with San Francisco Planning goals, including those outlined in the General Plan, the Showplace Square/Potrero Area Plan, Sustainability Plan, Climate Action Plan, Better Streets Plan, San Francisco Bicycle Plan, Transit First Policy, and the San Francisco Green Building Ordinance. However, it is important to note that a conflict between a project and a general plan policy or planning code regulation is not, in and of itself, a significant impact on the environment within the context of CEQA or NEPA. The staff report for the Planning Commission will contain the Planning Department's full analysis of the Proposed Project's consistency with the *Planning Code* and will discuss any exceptions requested or modifications needed. In addition, the Proposed Project would be required to adhere to the final Design Standards and Guidelines prepared for the Proposed Project which, with ultimate approval by the City, would ensure design consistency with the existing setting.

### 3.5 VISUAL QUALITY/AESTHETICS

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.3 and 5.3, *Visual Quality/Aesthetics*, of the Draft EIR/EIS. These include topics related to:

- AE-1: Consistency with General Plan Policies
- AE-2: Visual Simulations and Analysis
- AE-3: Public Views
- AE-4: Private Views

## Comment AE-1: Consistency with General Plan Policies

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Cameron

I-Marini

I-Robbins

I-Heath

I-O'Rourke

“Blocking Significant Public Vistas: The EIR clearly demonstrates that the vast southern views from PHRC will be obstructed by the proposed development, in strict violation of the SF General Plan. Equally valuable view sheds to the east of the SF Bay and Oakland/Fremont hills will all be obstructed, yet BRIDGE Housing completely ignores this fact. Example views from the PHRC playground and dog park include these:” Refer to comment letter I-Cameron for photos. (*Reynolds Cameron, email, January 7, 2015 [I-Cameron]*)

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“As you are well aware, the General Plan protects vistas from public parks. As one of the most spectacular views on the eastern side of San Francisco, this particular vista should certainly be preserved.” (*Alison Heath, email, January 6, 2015 [I-Heath]*)

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“Height and Density: The plans do not fully address the environmental and social impact of the tall, dense dwellings which are inconsistent with existing architecture of Potrero Hill, and appear inconsistent with City policies and mandates regarding hilltop open space, public parks, and vistas.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“It is my understanding that the Master Plan for the City of San Francisco calls for the protection of Greenspace and water views and I urge you to enforce these protections. I propose that the buildings for this area be built adhering to the current rooflines of the existing development so as to preserve these views for future generations.” (*Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke]*)

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“2. It is also my understanding that the proposed development would block the view of the trees and green area of the Potrero Hill Playground from other parts of the city, such as Bernal Heights Park and the 280 Connector. I see that the Master Plan for the city calls for protecting such landmark views and I urge you to enforce this protection.” (*Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke]*)



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“SECTION I-VIEWS/AESTHETICS. Introduction: This section demonstrates that the Hope SF Master Plan EIR/EIS grossly misrepresents the facts in the section that addresses the question of how views will be affected by the Proposed Project. The EIR/EIS was negligent in properly characterizing the effects of this development as currently proposed on the views from the public spaces of South Potrero, including the South End of the Potrero Hill Recreation Center, as well as the pedestrian thoroughfares of Wisconsin and 23rd St.

1.1 Hope SF Master Plan EIR/EIS treatment of Views/ Aesthetics: The EIS/EIR assesses impact on Views/Aesthetics in “Section 5.3: VISUAL QUALITY/AESTHETICS.” The report provides a “Context and Intensity Evaluation Guidelines under NEPA,” found in Appendix 1 of the EIS/EIR.

Section 5.3 of the EIR/ EIS states that under NEPA, the Proposed Project or its alternatives would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. The document then goes through a lengthy discussion that focuses on 9 select viewpoints. The document ultimately concludes that:

“in general, the Proposed Project would noticeably alter the visual character of the Project site compared to existing conditions; however, this impact would not be significant. While changes to the street grid, building configurations, landscaping, and other related elements would vastly alter its appearance, the visual quality of the Project site would generally be considered an improvement compared to existing conditions. Therefore, although the scale and residential density would increase at the Project site, the Proposed Project would not substantially degrade the existing visual character or quality of the site or the area or impact public view corridors. For the reasons stated above, the Proposed Project would result in less-than-significant impacts related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area.”  
{5.3.24 p 46}

1.2 Response: In fact, the Proposed Project will have significant negative impacts on “related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area” according to NEPA guidelines. The proposed project will completely block the public views from 23rd St. and negatively impact the view from the southern aspect of the Potrero Hill Rec Center on the ballfield looking south.

The conclusions of the EIS/EIR report are based on nine views. However, these views are incomplete selections that do not properly represent the views from the Project site location. In addition, they misrepresent the views of the sections they claim to represent and systematically fail to represent the best views of the neighborhood. These views will be irrevocably ruined by the proposed project.

It is irresponsible and inappropriate to sacrifice San Francisco’s world renowned public views for private development. As currently designed, the Project will construct units with outstanding views in the 45 foot and 60 foot buildings on 23rd St. and bordering the Rec Center, in order to maximize the

value of market rate apartments. The views from these private apartments will come at the expense of blocking the public space. The Developers are clearly building such tall buildings in order to maximize the value and number of market-rate apartments, rather than opting to preserve the public views and open space by building further down the hill (and thus sacrificing some of the views, and thus value of the new apartments)

I implore the responsible regulatory agencies to act responsibly and not sacrifice taxpayer and public space; the area can still be developed with slightly shorter buildings. Alternatively, tall buildings can be built on 25th St. at the bottom of the hill, preserving the views from the top while still maintaining density. I implore the responsible regulatory agencies to reconsider auctioning off our community common spaces for profit.

I hope that the Project can be amended to comply with SF Planning Department Goals and National Law (namely?) by building shorter buildings, thereby avoiding the ruin of the public spaces that form the heart and soul of San Francisco and the South Potrero Neighborhood." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Furthermore, it directly countermines the SF Planning Department Objectives and Policies, including the following from the General Plan (POLICY 3.1.5 - Respect public view corridors; Plan for Urban Design, which asserts that "massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city"; that "Building siting and massing with respect to street pattern influence the quality of views from street space"; "where large parks occur at tops of hills, low-rise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city"; "Views contribute immeasurably to the quality of the city and to the lives of its residents. Protection should be given to major views whenever it is feasible, with special attention to the characteristic views of open space and water that reflect the natural setting of the city and give a colorful and refreshing contrast to man's development"; "Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations"; "Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets."; as well as Objective 2 "Blocking construction or other impairment of pleasing street views of the Bay or Ocean, distant hills, or other parts of the city can destroy an important characteristic of the unique setting and quality of the city"; and Objective 3 "Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city."; "Tall buildings on slopes of hills severely restrict views from above."; POLICY 1.1 "Recognize and protect major views in the city, with particular attention to those of open space and water; "POLICY 3.4: "Promote building forms that will respect

and improve the integrity of open spaces and other public area, and “New buildings should not block significant views of public open spaces, especially large parks and the Bay. Buildings near these open spaces should permit visual access, and in some cases physical access, to them.”

In order to comply with the NEPA and SF Planning Department Regulations, these building must be at, near, or below the street level of 23rd Street. 40’ and 50’ foot buildings that tower above 23rd St. and the Potrero Hill Rec Center are not reasonable in this location, as they deprive the public of open space and awe-inspiring natural vistas of the San Francisco Bay and San Bruno Mountains and replace these views with views from private apartments. Views like this form the unique core of San Francisco, and sacrificing that public view for private profit by buildings tall private market rate apartments of that height is irresponsible and unacceptable.

Accordingly, on the basis of the impact on Viewpoint 2 and nearby locations, I would urge the EIR/EIS to read “significant impact” in section 5.3, and for Hope SF to reconsider the plans so as to mitigate this impact.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“Finally the SF planning’s general plan for urban design (<http://www.sfplanning.org/ftp/GeneralPlan/ISUrbanDesign.html>) stipulates the following Objectives and Policies, which are not met by the Proposed Project:

VIII. Objective 1, Policy 1.1:

- a. “Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations.”

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

- a. Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city.

X. POLICY 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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Response AE-1

These comments raise concerns regarding the consistency of the Proposed Project with the General Plan, with particular focus on impacts to visual character and quality. Chapter 3, *Plans and Policies*, of

the Draft EIR/EIS, analyzes the Proposed Project's compatibility to the City's General Plan. As discussed on pages 3-2 to 3-3, the Urban Design Element of the General Plan addresses issues related to City pattern, guidelines for major new development, and neighborhood environment, including views. The proposed buildings would generally be taller than those nearby, resulting in changes to the orientation and views, as noted by the commenters.

As described on page 3-1, a conflict between a project and a general plan policy does not, in itself, indicate a significant effect on the environment within the context of the CEQA and NEPA. Any conflicts between implementation of the Proposed Project and policies relating to physical environmental issues are discussed in the relevant environmental topic sections of Chapter 5, *Environmental Consequences*, of the Draft EIR/EIS. In assessing whether a potential project conflicts with the General Plan, the decision maker assesses the entire project in light of the various policies articulated in General Plan, of which there may be many. Deviation from one policy is not necessarily deviation from the entire General Plan. Variance from one policy does not result in overall inconsistency. Thus, in addition to considering inconsistencies with a particular policy of a particular element of the General Plan, the decision makers consider overall consistencies of the proposed project with the General Plan.

#### Comment AE-2: Visual Simulations and Analysis

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Reid

I-Robbins

A-Commissioner Antonini

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"Visual Quality/Aesthetics: The visual simulations contained in this section consist of photomontages of current site conditions with a Sketch Up three-dimensional schematic model of the proposed designs. These simulations are quite effective in communicating the scale, urban spatial character, degree of articulation, and overall visual impact of the proposals. However, the individual buildings show very little design development, which no doubt reflects the early stage of the project at the time of publication.

The text assures us that the project will follow the City's established design guidelines and fit with the surrounding context, but a visual indication of representative façade materials and details would have helped the reader imagine the project as an integral part of the Potrero Hill neighborhood." (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“SECTION I-VIEWS/AESTHETICS. Introduction: This section demonstrates that the Hope SF Master Plan EIR/EIS grossly misrepresents the facts in the section that addresses the question of how views will be affected by the Proposed Project. The EIR/EIS was negligent in properly characterizing the effects of this development as currently proposed on the views from the public spaces of South Potrero, including the South End of the Potrero Hill Recreation Center, as well as the pedestrian thoroughfares of Wisconsin and 23rd St.

1.1 Hope SF Master Plan EIR/EIS treatment of Views/ Aesthetics: The EIS/EIR assesses impact on Views/Aesthetics in “Section 5.3: VISUAL QUALITY/AESTHETICS.” The report provides a “Context and Intensity Evaluation Guidelines under NEPA,” found in Appendix 1 of the EIS/EIR.

Section 5.3 of the EIR/ EIS states that under NEPA, the Proposed Project or its alternatives would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. The document then goes through a lengthy discussion that focuses on 9 select viewpoints. The document ultimately concludes that:

“in general, the Proposed Project would noticeably alter the visual character of the Project site compared to existing conditions; however, this impact would not be significant. While changes to the street grid, building configurations, landscaping, and other related elements would vastly alter its appearance, the visual quality of the Project site would generally be considered an improvement compared to existing conditions. Therefore, although the scale and residential density would increase at the Project site, the Proposed Project would not substantially degrade the existing visual character or quality of the site or the area or impact public view corridors. For the reasons stated above, the Proposed Project would result in less-than-significant impacts related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area.”  
{5.3.24 p 46}

1.2 Response: In fact, the Proposed Project will have significant negative impacts on “related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area” according to NEPA guidelines. The proposed project will completely block the public views from 23rd St. and negatively impact the view from the southern aspect of the Potrero Hill Rec Center on the ballfield looking south.

The conclusions of the EIS/EIR report are based on nine views. However, these views are incomplete selections that do not properly represent the views from the Project site location. In addition, they misrepresent the views of the sections they claim to represent and systematically fail to represent the best views of the neighborhood. These views will be irrevocably ruined by the proposed project.

It is irresponsible and inappropriate to sacrifice San Francisco’s world renowned public views for private development. As currently designed, the Project will construct units with outstanding views in the 45 foot and 60 foot buildings on 23rd St. and bordering the Rec Center, in order to maximize the value of market rate apartments. The views from these private apartments will come at the expense of

blocking the public space. The Developers are clearly building such tall buildings in order to maximize the value and number of market-rate apartments, rather than opting to preserve the public views and open space by building further down the hill (and thus sacrificing some of the views, and thus value of the new apartments).

I implore the responsible regulatory agencies to act responsibly and not sacrifice taxpayer and public space; the area can still be developed with slightly shorter buildings. Alternatively, tall buildings can be built on 25th St. at the bottom of the hill, preserving the views from the top while still maintaining density. I implore the responsible regulatory agencies to reconsider auctioning off our community common spaces for profit.

I hope that the Project can be amended to comply with SF Planning Department Goals and National Law (namely?) by building shorter buildings, thereby avoiding the ruin of the public spaces that form the heart and soul of San Francisco and the South Potrero Neighborhood." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Finally, as mentioned above, the EIR/EIS report chose 9 strategic viewpoints. Unfortunately, these viewpoints are not actually representative of the views that will be affected by the Proposed Project. From the public open street of 23rd St., which was not included in the report, I took the photographs below (M-N) facing southeast and southwest:

Below is the same view (O-P) southeast then southwest through the chain link fence on the south side of 23rd St. I took this with a phone and it did not come out well, but in person the view appears more like the photographs above. You can see the current housing below street level in the foreground, and the San Bruno Mountain the background, with the Bay all the way to the left.

These street level views seen above from the public space of 23rd St. forms a central point of our community. The views make 23rd St. a popular pedestrian thoroughfare, which could increase significantly in usage if the greenway connecting 23rd to 25th Streets through the Proposed Project is completed as designed.

Here are views (O) from the east side of the Potrero Rec Center on the footpath looking east:

Here are the views from the east side of the Rec Center on Wisconsin near the bleachers of the baseball field looking east (P). The report did not include an assessment of whether views from these public spaces will be blocked. Given the importance of these views to the neighborhood, it is important to properly evaluate the environmental impact." Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins 2]*)

“Viewpoint 1: 22nd St Trail Looking East: Viewpoint 1 in the EIS/ EIR is a photograph of the top of the footpath looking east. The photograph included in the report shows a very limited scope and fails to demonstrate the beauty of our neighborhood and is not representative of the views that will be irrevocably ruined by the proposed development. The photographs below (A-D) are taken a hundred feet or so further down the footpath, from the northeast corner of the Potrero Hill Recreation Center. Each of these photos shows that the views jeopardized by the proposed project are stunning vistas of the Bay, San Francisco and surrounding towns - rather than the unattractive view presented in Viewpoint 1. It is notable that this part of the Rec Centre is a very well used: while I was out taking these photos over 15 minutes, I encountered 20–30 other individuals of all ages strolling around the Park enjoying these views.

Photograph A (southeast corner of the Park facing East/Southeast with the park and current housing in the forefront, the Dogpatch in the midground, and the Bay and Oakland hills in the background).

Photograph B (southeast corner of the Park facing East with the current housing in the foreground)

Photograph C (southeast corner of the Park facing East/Southeast with current housing in foreground)

Photograph D (southeast corner of the Park facing East with housing in the foreground, the Dogpatch in the mid-ground, and the Bay and Oakland docks in the background)

These views are outstanding and are currently widely enjoyed by the community. By limiting consideration to Viewpoint 1, the EIR/EIS fails to address the impact of the Proposed Project on the public spaces of the Potrero Hill Rec Center.

Viewpoint 2: Potrero Hill Recreation Centre, Looking”. Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“Viewpoint 2: Potrero Hill Recreation Centre, Looking South: Viewpoint 2 shows the ballfield and pedestrian path that circles the Rec Center - traditional places in the neighborhood to exercise, play sports, read, watch the sunset, and enjoy the outdoors and the environment of San Francisco. It is one of the most outstanding south facing views in the city in all of San Francisco, and a core component of the aesthetics and feel of the neighborhood.

The EIS/EIR report concludes that the view from Viewpoint 2 is “considered of low to moderate quality,” due to the intervening fence and foliage, and because people generally do not sit and watch the view but instead tend to just pass through. However, the picture displayed in the EIS/EIR report (Viewpoint 2) is deliberately misleading: it is taken well back from the fence, so that the baseball field takes up most of the picture in the foreground. In actuality, the view from the baseball field is expansive, and putting tall buildings near 23rd Street and the park to block that view would have a

significant negative impact. The baseball field and the path that circles the field is widely used by the community, and sacrificing the Bay and Hill views from these public spaces in order to build beautiful views from private apartments is inexcusable.

Here are photos I took (E-F) from a handheld phone facing southeast and southwest from the foot path immediately on the south side of the fence that circles the Rec Center and provides a scenic running pathway central to our neighborhood:

Photo E (facing South/Southwest from the south side of the baseball field with the current housing in the foreground, the Starr King Elementary School in the mid-ground, and the San Bruno Mountain the background).

Photo F (facing South/Southeast from the south side of the baseball field with 23rd Street in the foreground, 1-280 in the mid-ground, and the Bay and East Bay in the background)

Photo G (facing South/Southwest from the footpath on the south side of the baseball field)

Photo H (facing due South from a different part of the footpath on the south side of the baseball field)

Photo I (facing due South/Southeast from a different part of the footpath on the south side of the baseball field highlighting the expansive Bay Views)

Unfortunately I could not go on the baseball field and take the pictures through the fence because the field was flooded from the record rains (replace with photos). The view from field through the fence magnificent and enjoyed frequently and thoroughly by the community. Importantly, the EIS/EIR neglected to mention the footpath that circles the baseball field and providence an opportunity for walking and viewing the sunset, and which would suffer from obstruction from the new buildings. Blocking the view from with the Proposed Project buildings is a blow to our neighborhood and to our city, and indeed an affront to the neighbors and citizens who have lived in this area and utilized the open spaces for years." Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Other Viewpoints: Similar to Viewpoint 2, the photographs taken from Viewpoint 3 and Viewpoint 4 are set well back from the actual view so as to avoid revealing the true impact on the public street view. Since the street is flat, standing back leads to a poor view. In truth, the views from the corner of 23rd and Wisconsin are beautiful public view corridors of the San Francisco Bay. The east facing vista is a treasure for sun rises.

The Proposed Project will significantly and detrimentally impact this view. Below are photos I took (I-J) from the southeast corner of 23rd and Wisconsin, a place where locals currently walk with frequency in order to enjoy the natural beauty that forms the core of our current community:



Photo I (Facing east/southeast from the southeast corner of 23rd and Wisconsin, with the current housing in the midground and the Bay in the background):

And below Photo J through the chain link fence from the same location:

Below is Photo K from the Potrero Hill Rec Center on the west side of the baseball field looking south along Arkansas (the baseball field is immediately to the left on the other side of the fence).

Below is Photo L facing southeast from Wisconsin street on the west side of the Rec Center. The baseball field is in the foreground and the San Bruno Mountains in the background. The Proposed Project will obstruct views from throughout the baseball field Rec Center if it is built more than 10–15' feet above the current level of 23rd Street." Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"I did see one thing on View 5.3-13—and this is only an alternative, but it does show very well-articulated area, but then it shows an area that looks like it's almost the same height.

I think this is probably — this is a reduced development alternative, so I don't think that's representative of what the project would be looking like in the planned alternative. But I want to make sure that all the parts of the development are well articulated and are not just the same height all along in any part of the development.

And so that was one area that I wasn't quite sure what it's going to look like in the preferred alternative." (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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Response AE-2

These comments raise concerns regarding the selection of vantage points and the visual simulations prepared for the Proposed Project, with particular focus on the upper elevations of Potrero Hill, such as from the Recreation Center and 23<sup>rd</sup> Street. After review and consideration of the suggested viewpoints suggested by commenters, the analysis has been expanded and significance conclusions have been reconsidered. The following response includes a summary of the findings of the revised analysis and the full text of Section 4.3 and 5.3, *Visual Quality/Aesthetics*, is presented in Chapter 4, *Draft EIR/EIS Revisions*, of this Responses to Comments document.

As described in Section 5.3, *Visual Quality/Aesthetics*, visual simulations were prepared and employed to determine potential effects. Building articulation included in the simulations is demonstrative since the design of the buildings has not yet been developed. The Planning Department selected nine vantage points based on those identified during the scoping process and considered to be sensitive

viewer locations, which include parks, publicly accessible buildings, and sidewalks that offer a view of the urban and natural landscape making up a viewshed. Since the preparation of the Draft EIR, additional views from these vantage points have been added to the analysis, including from the eastern terminus of the 22<sup>nd</sup> Street Trail, the bench below the tennis courts, and the Potrero Hill Recreation Center. The views from each of these nine vantage points are depicted on Figure 4.3-1 and Table 4.3-1 of the revised analysis.

A visual simulation was prepared from the corner of 23<sup>rd</sup> Street and Wisconsin Street, looking east (Viewpoint 3). The view from 23<sup>rd</sup> Street, further east, (as suggested by the commenter) is similar to that described on pages 5.3-13 to 5.3-14 in the Draft EIR/EIS and pages as detailed in revised analysis. As described, existing foreground views consist of street pavement, overhead utility wires and poles, and a chain-link fence surrounding the Project site. The existing chain-link fence is approximately six feet tall and partially obstructs the views as seen from the pedestrian level. Middleground views encompass minimal vegetation at the Project site and the roofs of the existing buildings at the Project site. Background views of the Bay and ridgelines are expansive facing south. However, this area is not a designated open space with sensitive viewers. Instead, 23<sup>rd</sup> Street is used by motorists and pedestrians who travel in an east-west direction. Motorists have only fleeting views of the Project site due to the speeds permitted and the fact that the drivers on these streets typically direct their attention to the road ahead, rather than to views. Accordingly, motorists are not considered sensitive viewers. Pedestrians have a similar experience, as their views change as the pedestrian adjusts position. As the viewer walks along 23<sup>rd</sup> Street, the long-range views will be visible between the new buildings on the proposed grid streets. In addition, views are mainly seen through the chain-link fencing. Therefore, although the views as currently seen would be completely blocked by the proposed buildings, the Project would not detract from existing view as this is not considered a scenic view or sensitive viewer location under NEPA.

The views from the eastern terminus of the 22<sup>nd</sup> Street Trail and the bench below the tennis courts are depicted in Figures 5.3-1 through 5.3-4 (Viewpoint 1A through 1D) and analyzed under Impact AE-1 of the revised analysis. As discussed, views looking northeast and southeast afford a nearly panoramic view of the San Francisco downtown area, the Bay Bridge, the Bay, and the East Bay Hills and viewer sensitivity is considered high from this location. As shown in Figure 5.3-1 and 5.3-2, the Project would not substantially obstruct these views and changes to the viewshed from the eastern terminus of the 22<sup>nd</sup> Street Trail are considered less than significant. As shown in Figure 5.3-3, which illustrates the view looking south from the 22<sup>nd</sup> Street Trail, the Project would not introduce elements into a currently unobstructed view. Finally, the view from the bench below the tennis courts, as shown in Figure 5.3-4 would not be affected by the Project due to the vegetative screening and because development is a common visual element in this view.

Views from the Recreation Center are analyzed under Impact AE-1 of the revised analysis. Additional views were added to the analysis as follows: 1) views looking south from northern edge of playfields; 2) views looking south from middle of playfields, 3) views looking east from eastern edge

of playfields; 4) views looking east from middle of playfields; and 5) views looking east from northwestern edge of playfields.

As shown in 5.3-5 through 5.3-7 (views looking south) of the revised analysis, the proposed buildings, which would be approximately 40 to 50 feet in height, would obscure a portion of the view of the ridgeline. Although limited channelized views of the McLaren Ridge and San Bruno Mountain would be provided between the proposed buildings, the height and mass of the proposed buildings would significantly change the existing view from the southern area of the Recreation Center from one that features predominantly natural landscapes to one that features a built environment. In general, as discussed in the revised analysis, the Proposed Project would result in a significant impact to the views of scenic resources and would generally reduce public opportunities to view scenic resources. The project applicant has agreed to implement Mitigation Measure M-AE-1 which would reduce this significant impact to a less-than-significant level as it would reduce heights on Blocks J, K, and L by 10 feet and eliminate the degree to which the Project blocks view looking south from the Potrero Hill Recreation Center. Mitigation Measure M-AE-1 would require buildings along 23<sup>rd</sup> Street be reduced as follows: Block J from 40 feet to 30 feet, Block K from 40 feet to 30 feet, and Block L from 50 feet to 40 feet. Scenic vista views from 23<sup>rd</sup> Street and Wisconsin Street would be obscured by the height of the proposed buildings. Implementation of Mitigation Measure M-AE-1 would allow views of the ridgeline to remain largely visible from the most sensitive public viewpoints near the Potrero Hill Recreation Center. Figures 5.3-5 through 5.3-7 in the revised analysis depict visual simulations of the modified reduced height scenario as prescribed by Mitigation Measure M-AE-1. Although the built elements of the Proposed Project would be introduced into the foreground and would block some middleground urban development views, long-range views of the McLaren Ridge and the San Bruno Mountain scenic resources would still be visible from this viewpoint with the reduced building heights. Thus, with implementation of Mitigation Measure M-AE-1, the Proposed Project would not substantially block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. Implementation of Mitigation Measure M-AE-1 would result in a redistribution of units on the Project site and no previously unidentified impacts would occur as a result of this mitigation measure.

As shown in Figure 5.3-8 of the revised analysis, views looking east from the Potrero Hill Recreation Center playfields would not be affected by the Project due to the steep slopes adjacent to the park. Furthermore, these views are dominated by existing dense vegetation that obscures views to the east. The vegetation would remain following Project implementation.

Figure 5.3-15 of the revised analysis illustrates the Reduced Development Alternative from I-280. The commenter is correct that part of the Project site (the west side) does not look well articulated when compared to the east side of the site. The boxy forms shown in the eastern portion of the Project are presented to only to illustrate the general massing that is proposed. Upon buildout of the Project, it is anticipated that the articulation would be similar to what is shown in the western side of the site in this figure.

### Comment AE-3: Public Views

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Cameron

I-O'Rourke

I-Sabre & Loura (1)

I-Heath

I-Robbins

I-Serwer and Dreschler (2)

I-Meroz

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“Blocking Significant Public Vistas: The EIR clearly demonstrates that the vast southern views from PHRC will be obstructed by the proposed development, in strict violation of the SF General Plan. Equally valuable view sheds to the east of the SF Bay and Oakland/Fremont hills will all be obstructed, yet BRIDGE Housing completely ignores this fact. Example views from the PHRC playground and dog park include these:” Refer to comment letter I-Cameron for photos. *(Reynolds Cameron, email, January 7, 2015 [I-Cameron])*

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“Members of the San Francisco Planning Commission (and the SF Political Establishment):

I write to express strong opposition against the currently proposed BRIDGE Housing concept for Potrero Hill. There are several bases for my objection, which include:

- Blocking the public vista from the Potrero Hill Recreation Center (PHRC)
- Providing inadequate public benefit
- Providing insufficient housing density
- Auto-centric streetscape
- Misappropriation of the public purse
- Wasted opportunity to build a transformative project that would improve San Francisco for generations” *(Reynolds Cameron, email, January 7, 2015 [I-Cameron])*

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“While I am in support of many of the objectives of the redevelopment of the Potrero Terrace and Annex project as mixed income housing, I have concerns with the loss of vistas at the top of the hill and from the Potrero Hill Rec Center.” *(Alison Heath, email, January 6, 2015 [I-Heath])*

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“The location, at the top of Potrero Hill, offers unequalled public views to the east. Renderings given in the EIR indicate that public views will be blocked by the project as proposed. In particular, the row of 65' buildings at the northern end of the proposed project will have the greatest impact.” *(Yoram Meroz, email, January 7, 2015 [I-Meroz])*

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"1. The proposed development would obliterate the panoramic views along street level of 23rd St., between Wisconsin and Missouri Streets. This important viewshed affords almost 180 degree open space views of the San Bruno Mountains and the San Francisco Bay. The uniqueness and beauty of this view cannot be overstated. The vast open space is food for the senses and has therapeutic value. Watching the fingers of fog roll in over the city from here is a magical experience. Again I am referring to the view from street level, which can be enjoyed by all present and future residents and visitors of this part of the hill." (Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke])

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"2. It is also my understanding that the proposed development would block the view of the trees and green area of the Potrero Hill Playground from other parts of the city, such as Bernal Heights Park and the 280 Connector. I see that the Master Plan for the city calls for protecting such landmark views and I urge you to enforce this protection." Refer to comment letter I-O'Rourke for photo. (Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke])

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"View from street level at corner of 23rd and Arkansas Streets: The view encompasses the Bay and East Bay Hills on the left, Candlestick Point due south and the San Bruno Mountains to the right rear.

The view is much better in person and I encourage you and members of the Planning Commission to come out to see it in person before making any decision on allowing construction to block this view." (Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke])

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"Section 1: Views/ Aesthetics -At the proposed height, the buildings of the Proposed Project bordering on 23rd St. (K-M) will obstruct the viewing corridors on the street level from 23rd Street and from the south side of the Potrero Hill Recreation Center. This obstruction will significantly impact pedestrians, residents, users of the park, and the broader community. These views are part of the treasured open spaces of our community and obstructing them is not consistent with SF Planning Department's plans and goals for development. The information presented in the EIR/EIS is clearly misleading and the conclusion reached in the EIR/EIS that the development will have a "less than significant" effect on View and Aesthetics (Section 5.3) is therefore invalid." (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

“SECTION I-VIEWS/AESTHETICS. Introduction: This section demonstrates that the Hope SF Master Plan EIR/EIS grossly misrepresents the facts in the section that addresses the question of how views will be affected by the Proposed Project. The EIR/EIS was negligent in properly characterizing the effects of this development as currently proposed on the views from the public spaces of South Potrero, including the South End of the Potrero Hill Recreation Center, as well as the pedestrian thoroughfares of Wisconsin and 23rd St.

1.1 Hope SF Master Plan EIR/EIS treatment of Views/ Aesthetics: The EIS/EIR assesses impact on Views/Aesthetics in “Section 5.3: VISUAL QUALITY/AESTHETICS.” The report provides a “Context and Intensity Evaluation Guidelines under NEPA,” found in Appendix 1 of the EIS/EIR.

Section 5.3 of the EIR/EIS states that under NEPA, the Proposed Project or its alternatives would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. The document then goes through a lengthy discussion that focuses on 9 select viewpoints. The document ultimately concludes that:

“in general, the Proposed Project would noticeably alter the visual character of the Project site compared to existing conditions; however, this impact would not be significant. While changes to the street grid, building configurations, landscaping, and other related elements would vastly alter its appearance, the visual quality of the Project site would generally be considered an improvement compared to existing conditions. Therefore, although the scale and residential density would increase at the Project site, the Proposed Project would not substantially degrade the existing visual character or quality of the site or the area or impact public view corridors. For the reasons stated above, the Proposed Project would result in less-than-significant impacts related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area.”  
{5.3.24 p 46}

1.2 Response: In fact, the Proposed Project will have significant negative impacts on “related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area” according to NEPA guidelines. The proposed project will completely block the public views from 23rd St. and negatively impact the view from the southern aspect of the Potrero Hill Rec Center on the ballfield looking south.

The conclusions of the EIS/EIR report are based on nine views. However, these views are incomplete selections that do not properly represent the views from the Project site location. In addition, they misrepresent the views of the sections they claim to represent and systematically fail to represent the best views of the neighborhood. These views will be irrevocably ruined by the proposed project.

It is irresponsible and inappropriate to sacrifice San Francisco’s world renowned public views for private development. As currently designed, the Project will construct units with outstanding views in the 45 foot and 60 foot buildings on 23rd St. and bordering the Rec Center, in order to maximize the value of market rate apartments. The views from these private apartments will come at the expense of

blocking the public space. The Developers are clearly building such tall buildings in order to maximize the value and number of market-rate apartments, rather than opting to preserve the public views and open space by building further down the hill (and thus sacrificing some of the views, and thus value of the new apartments).

I implore the responsible regulatory agencies to act responsibly and not sacrifice taxpayer and public space; the area can still be developed with slightly shorter buildings. Alternatively, tall buildings can be built on 25th St. at the bottom of the hill, preserving the views from the top while still maintaining density. I implore the responsible regulatory agencies to reconsider auctioning off our community common spaces for profit.

I hope that the Project can be amended to comply with SF Planning Department Goals and National Law (namely?) by building shorter buildings, thereby avoiding the ruin of the public spaces that form the heart and soul of San Francisco and the South Potrero Neighborhood." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Viewpoint 1: 22nd St Trail Looking East: Viewpoint 1 in the EIS/ EIR is a photograph of the top of the footpath looking east. The photograph included in the report shows a very limited scope and fails to demonstrate the beauty of our neighborhood and is not representative of the views that will be irrevocably ruined by the proposed development. The photographs below (A-D) are taken a hundred feet or so further down the footpath, from the northeast corner of the Potrero Hill Recreation Center. Each of these photos shows that the views jeopardized by the proposed project are stunning vistas of the Bay, San Francisco and surrounding towns - rather than the unattractive view presented in Viewpoint 1. It is notable that this part of the Rec Centre is a very well used: while I was out taking these photos over 15 minutes, I encountered 20–30 other individuals of all ages strolling around the Park enjoying these views.

Photograph A (southeast corner of the Park facing East/Southeast with the park and current housing in the forefront, the Dogpatch in the midground, and the Bay and Oakland hills in the background).

Photograph B (southeast corner of the Park facing East with the current housing in the foreground)

Photograph C (southeast corner of the Park facing East/Southeast with current housing in foreground)

Photograph D (southeast corner of the Park facing East with housing in the foreground, the Dogpatch in the mid-ground, and the Bay and Oakland docks in the background)

These views are outstanding and are currently widely enjoyed by the community. By limiting consideration to Viewpoint 1, the EIR/EIS fails to address the impact of the Proposed Project on the public spaces of the Potrero Hill Rec Center.

Viewpoint 2: Potrero Hill Recreation Centre, Looking". Refer to comment letter I-Robbins for photos. (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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"Viewpoint 2: Potrero Hill Recreation Centre, Looking South: Viewpoint 2 shows the ballfield and pedestrian path that circles the Rec Center - traditional places in the neighborhood to exercise, play sports, read, watch the sunset, and enjoy the outdoors and the environment of San Francisco. It is one of the most outstanding south facing views in the city in all of San Francisco, and a core component of the aesthetics and feel of the neighborhood.

The EIS/EIR report concludes that the view from Viewpoint 2 is "considered of low to moderate quality," due to the intervening fence and foliage, and because people generally do not sit and watch the view but instead tend to just pass through. However, the picture displayed in the EIS/EIR report (Viewpoint 2) is deliberately misleading: it is taken well back from the fence, so that the baseball field takes up most of the picture in the foreground. In actuality, the view from the baseball field is expansive, and putting tall buildings near 23rd Street and the park to block that view would have a significant negative impact. The baseball field and the path that circles the field is widely used by the community, and sacrificing the Bay and Hill views from these public spaces in order to build beautiful views from private apartments is inexcusable.

Here are photos I took (E-F) from a handheld phone facing southeast and southwest from the foot path immediately on the south side of the fence that circles the Rec Center and provides a scenic running pathway central to our neighborhood:

Photo E (facing South/Southwest from the south side of the baseball field with the current housing in the foreground, the Starr King Elementary School in the mid-ground, and the San Bruno Mountain the background).

Photo F (facing South/Southeast from the south side of the baseball field with 23rd Street in the foreground, 1-280 in the mid-ground, and the Bay and East Bay in the background)

Photo G (facing South/Southwest from the footpath on the south side of the baseball field)

Photo H (facing due South from a different part of the footpath on the south side of the baseball field)

Photo I (facing due South/Southeast from a different part of the footpath on the south side of the baseball field highlighting the expansive Bay Views)

Unfortunately I could not go on the baseball field and take the pictures through the fence because the field was flooded from the record rains (replace with photos). The view from field through the fence magnificent and enjoyed frequently and thoroughly by the community. Importantly, the EIS/EIR neglected to mention the footpath that circles the baseball field and providence an opportunity for



walking and viewing the sunset, and which would suffer from obstruction from the new buildings. Blocking the view from with the Proposed Project buildings is a blow to our neighborhood and to our city, and indeed an affront to the neighbors and citizens who have lived in this area and utilized the open spaces for years." Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Other Viewpoints: Similar to Viewpoint 2, the photographs taken from Viewpoint 3 and Viewpoint 4 are set well back from the actual view so as to avoid revealing the true impact on the public street view. Since the street is flat, standing back leads to a poor view. In truth, the views from the corner of 23rd and Wisconsin are beautiful public view corridors of the San Francisco Bay. The east facing vista is a treasure for sun rises.

The Proposed Project will significantly and detrimentally impact this view. Below are photos I took (I-J) from the southeast corner of 23rd and Wisconsin, a place where locals currently walk with frequency in order to enjoy the natural beauty that forms the core of our current community:

Photo I (Facing east/southeast from the southeast corner of 23rd and Wisconsin, with the current housing in the midground and the Bay in the background):

And below Photo J through the chain link fence from the same location:

Below is Photo K from the Potrero Hill Rec Center on the west side of the baseball field looking south along Arkansas (the baseball field is immediately to the left on the other side of the fence).

Below is Photo L facing southeast from Wisconsin street on the west side of the Rec Center. The baseball field is in the foreground and the San Bruno Mountains in the background. The Proposed Project will obstruct views from throughout the baseball field Rec Center if it is built more than 10–15' feet above the current level of 23rd Street." Refer to comment letter I-Robbins for photos. (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"The aesthetics of the street, and as a corollary of the neighborhood, will be completely and irreversibly marred if buildings J-L are constructed at the currently proposed height. The EIS/EIR needs to revise its section on Views/Aesthetics as required by NEPA given this evidence. It will also need to justify the infringement on the goals of the SF Planning Department.

In summary, the Proposed Project with building upwards of 40–50' at sites J-M has significant impacts "related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area." This was not captured at all in the EIS/EIR and need to be addressed. Indeed, these impacts cannot be mitigated as the project is currently proposed.

In order to adequately address these impacts, I propose three options that all keep buildings J-L (and possibly M) no more than 10–15 feet above street level and therefore preserve the views:

1. Build shorter buildings at J-M. This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
2. Build shorter building at J-M but build taller buildings further down the hill (e.g., Building A-Hand X). This will allow the same number of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at '65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents and future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco.
3. Build the same height buildings but start at a lower height (do not terraform the land and add fill to bring up the height of the south side of 23rd St.). This will also not impact views from 23<sup>rd</sup> St. or the Potrero Hill Rec Center open spaces. In addition, the EIS/EIR needs to address how the views on the east side of the Potrero Hill Rec Center will be affected by this development, as again these public views are a treasured aspect of our neighborhood and are protected under NEPA and the goals of the SF Planning Department and the city of SF." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Section V: Issues related to community integration, open spaces, and responsible development: Concerns about issues related to community integration, open spaces, and responsible development include:

- a. The developers plan to import 77.810 CY of fill, much of which will be used to raise the land level up to 23rd St. The natural topography of the hill is there is steeply sloping; thus the Proposed Plan is in direct conflict with NEPA and CEQA - both of which call for the topography to be maintained. A solution to this conflict would be to start lower down the hill - in line with the natural topography of the hill. This would have the added benefit of preserving street level view corridors and views from the rec center as detailed below." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Summary: In summary, the EIR/EIS report failed to adequately address the impact of the Proposed Project views/aesthetics, shadow, community integration and general congestion. While I welcome Rebuild Potrero's plan to redevelop the south side of Potrero Hill. Importantly, I believe that this project can meet the city's housing needs and also responsibly attend to the preservation of the

neighborhood and quality of life of the existing residents. However, the current Proposed Project fails to adequately preserve public open space and views and the EIR/EIS failed in its stated mission to accurately assess this impact. Accordingly, I believe that the Hope SF must redesign the Proposed Plan with a more neighborhood-friendly design that focuses on preserving the open space and views that form the heart and soul of San Francisco and Potrero Hill in particular. It is the responsibility of both the developers and the governmental regulatory agencies to ensure that private profit does not supersede public interests." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"The proposed development is too dense and too high, obliterating existing views and increasing traffic congestion beyond tolerable levels. (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

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"One last thing, please keep most of the views from the Potrero Hill Recreation Center." (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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#### Response AE-3

These comments raise concerns regarding views to and from the Project Site and the impact of the Proposed Project on these public views, with particular focus on the upper elevations of Potrero Hill, such as from the Recreation Center and 23<sup>rd</sup> Street. As explained on page 5.3-3, the Proposed Project is subject to Senate Bill (SB) 743 and Section 21099 of the Public Resources Code, which eliminated the analysis of aesthetics impacts for certain infill projects under CEQA. Accordingly, the Draft EIR/EIS does not provide CEQA conclusions regarding aesthetics and impacts to views. Instead, the thresholds for determining the significance of visual quality impacts in the analysis area are consistent with NEPA, including the analysis of impacts to existing views. The section assesses the potential visual effects based on field reconnaissance/site visits and the review of photographs of existing conditions from key viewpoints, as determined by the Planning Department. Visual simulations were also prepared and studied to determine potential effects; however, these simulations do not include proposed street trees and landscaping that would buffer and soften the visual impacts from the new structures.

As discussed on page 4.3-6 of the Draft EIR/EIS in the revised analysis presented in Chapter 4, *Draft EIR/EIS Revisions*, of this Comments and Responses' document, the Project Site currently includes expansive long-range views that encompass distinctive landscape features. Since the preparation of the Draft EIR/EIS, additional views from these vantage points have been added to the analysis, including from the eastern terminus of the 22<sup>nd</sup> Street Trail, the bench below the tennis courts, and the

Potrero Hill Recreation Center. The views from each of these nine vantage points are depicted on Figure 4.3-1 and Table 4.3-1 of the revised analysis. The existing views are depicted in Figure 4.3-2 through Figure 4.3-10 of the revised analysis. Viewpoints 1A through 1C represent views from the eastern terminus of the 22<sup>nd</sup> Street Trail and the bench below the tennis courts. Viewpoints 2A through 2C represent views from a scenic vista, in this case, looking south from the Recreation Center playfields. Viewpoints 2D through 2F show views looking east from the Recreation Center playfields. Viewpoints 3 through 7 represent public views of and through the Project site from outside the Project site. For the purposes of the NEPA analysis, a view of scenic resources is defined as a public view that is broad and expansive and of a significant landscape feature or of a significant historic or architectural feature. In the vicinity of the Project Site, the views from portions of Recreation Center and the 22<sup>nd</sup> Street Trail are considered scenic with high viewer sensitivity due to the nature of the use and the views of the Bay, East Bay Hills, San Francisco downtown, San Bruno Mountain, and McLaren Ridge from certain public areas of the park.

Viewpoint 1, viewer sensitivity is considered high and the proposed buildings would add some bulk into an already obstructed view to the southeast. Because the overall existing panoramic views of the San Francisco Downtown area, the Bay Bridge, the Bay, and the East Bay Hills would remain visible, the impact at Viewpoint 1 would not be significant. At Viewpoint 2, the Proposed Project would add buildings that are up to 15 feet taller than the existing buildings adjacent to the Recreation Center, and these new buildings would alter views of scenic vistas. Although channelized views of the ridgeline would be provided between the proposed buildings, these views would be limited and would still significantly block views and reduce public opportunities to view McLaren Ridge and the San Bruno Mountain. As discussed above, the project applicant has agreed to implement Mitigation Measure M-AE-1 which would reduce this significant impact to a less-than-significant level as it would reduce heights on Blocks J, K, and L by 10 feet and eliminate the degree to which the Project blocks view looking south from the Potrero Hill Recreation Center.

The Draft EIR/EIS also studies views from other vantage points that are not considered scenic vistas, such as streets. Impacts on public view corridors are analyzed under Impact AE-3 on pages 5.3-12 through 5.3-24 of the Draft EIR/EIS. These conclusions have not changed in the revised analysis. As stated, the effect would not be significant because views from the identified view corridors are of low to moderate quality and would be of short duration for motorists and pedestrians traveling along the Project area streets.

For example, a visual simulation was prepared from the corner of 23<sup>rd</sup> Street and Wisconsin Street, looking east (Viewpoint 3). The view from 23<sup>rd</sup> Street, further east, is similar to that described on pages 5.3-13 to 5.3-14 of the Draft EIR/EIS. As described, existing foreground views consist of street pavement, overhead utility wires and poles, and a chain-link fence surrounding the Project site. The existing chain-link fence is approximately six feet tall and partially obstructs the views as seen from the pedestrian level. Middleground views encompass minimal vegetation at the Project site and the roofs of the existing buildings at the Project site. Background views of the Bay and ridgelines are

expansive facing south. However, this area is not a designated open space with sensitive viewers. Instead, 23<sup>rd</sup> Street is used by motorists and pedestrians who travel in an east-west direction. Motorists only have fleeting views of the Project site due to the speeds permitted and the fact that the drivers on these streets typically direct their attention to the road ahead, rather than to views. Accordingly, motorists are not considered sensitive viewers. Pedestrians have a similar experience, as their views change as the pedestrian adjusts position. As the viewer walks along 23<sup>rd</sup> Street, the long-range views will be visible between the new buildings on the proposed grid streets. In addition, views are mainly seen through the chain-link fencing. Therefore, although the views as currently seen would be completely blocked by the proposed buildings, this is not considered a scenic view or sensitive viewer location under NEPA.

As explained on page 5.3-6 of the Draft EIR/EIS, although the Project Site is visible from other surrounding locations, the Project site is not part of a scenic view as viewed from outside the site because Potrero Hill blocks scenic views of any panoramic vistas beyond. In addition, the existing view of the site itself is of low quality due to the deteriorated character of the existing development. The Proposed Project as seen from surrounding areas, including from Bernal Heights Park, would not substantially affect the vista due to the distance from the viewers and the built-out urban nature of the City. The proposed structures would comprise a minor element in views from surrounding areas, such as from Bernal Heights Park. Views from Interstate 280 (I-280) are discussed in Impact AE-3 and shown in Viewpoint 9 (Figure 5.3-9 in the Draft EIR/EIS and Figure 5.3-19 in the revised analysis). As shown, the height, massing, and density under the Proposed Project would increase, but would not block views of or damage any scenic resources as viewed from I-280.

Impact AE-4 (page 5.3-24 of the Draft EIR/EIS) discusses the alteration of the land form. When Potrero Terrace and Potrero Annex housing developments were originally developed, a substantial amount of excavation, fill, and grading was performed to establish building foundations and the road network. As such, the existing topography of the Project Site is significantly modified from its original state. NEPA does not require the topography to be maintained; instead, it considers whether a project would substantially alter the land form or demonstrably destroy these features. Although the Project would alter the existing man-made topography, the grid pattern street system would visually enhance the Project site and allow it to blend with its surroundings. As such, the Proposed Project would result in less-than-significant impacts on the alteration of existing land forms.

Alternatives to reduce heights and massing were proposed. These alternatives will be considered by the Planning Commission during the approval process. The buildings under Alternative 1 adjacent to 23<sup>rd</sup> Street and the Recreation Center would be approximately 40 feet in height, which is approximately 10 feet taller than the existing buildings. Furthermore, as discussed above, a mitigation measure is now required to reduce impacts from the Project to views looking south from the Potrero Hill Recreation Center.

In general, Alternative 1 would noticeably alter the visual character and views to/from the Project Site compared to existing conditions; however, Alternative 1 would result in an improvement compared to the existing conditions (page 3.5-35 of the Draft EIR/EIS). Visual simulations of Alternative 1 are shown in Figures 5.3-10 through 5.3-13 and analyzed on pages 5.3-26 to 5.3-39 of the Draft EIR/EIS. These simulations are also included in the revised analysis as Figures 5.3-17 through 5.3-19. As part of Alternative 2, all existing housing units at the Project Site would be demolished and rebuilt using the same building pattern and height that currently exists. Therefore, the overall visual conditions at the site would not change, no background views would be blocked, and density would not increase. Alternative 3 analyzes a scenario that would result in the same conditions at the Project site as existing. The Draft EIR/EIS analyzes a range of alternatives that would reduce the height and massing of the Proposed Project and all will be considered during the approval process. No further discussion is necessary.

#### Comment AE-4: Private Views

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)

I-Lee H

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“But the way the plan currently reads, it is clear that my other concerns (noise, congestion, pollution) will have a marked increase, and not only just during the 10 year rebuild.

I do not think it fair that my block will lose its view and be saddled with a 40 foot wall of buildings (whose occupants will then have our view), a massive increase in cars and buses on my street, which will create a canyon of noise and pollution at our doorstep, without any recompense to us at all. This hardly seems fair.” (Lee Abel, letter, January 4, 2015, [I-Abel (1)])

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“This will create a negative impact on the buildings directly across the street from the project. For those buildings currently on 23rd Street, the proposed buildings would block their entire view, deprive them of the direct heat generated from the sun, will have a negative visual impact on the community at large, and will bring more traffic than the narrow road was meant to handle.

We hope the proposed buildings on 23rd Street can either be removed from the master plan or relocated to an area that is less obtrusive. This will also help to minimize the visual footprint of this large-scale project.” (Homer Lee, letter, January 4, 2015 [I-Lee H])

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Response AE-4

These comments raise concerns regarding the impact of the Proposed Project on private views. Impacts to private views are discussed in Section 5.3, *Visual Quality/Aesthetics*, on page 5.3-7 of the Draft EIR/EIS and in the revised analysis. Private views are not considered scenic under the City's significance criteria. The Proposed Project would obscure and/or alter some existing private views from neighborhoods to the west of the Project site along 23<sup>rd</sup> Street and Wisconsin Street. The Proposed Project would replace longer-range private views across the site with shorter-range views of the proposed new buildings. The alteration or interruption of private views is a commonly expected and experienced consequence of new construction within a densely populated urban setting. A project would only be considered to have a significant effect on views of scenic resources if it were to substantially degrade or obstruct public scenic views as observed from public areas. The changes to private views resulting from the Proposed Project would not be considered an adverse aesthetic effect under NEPA and, therefore, are not analyzed further.

### 3.6 SOCIOECONOMICS AND COMMUNITY/POPULATION AND HOUSING

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.4 and 5.4, *Socioeconomics and Community/Population and Housing*, of the Draft EIR/EIS. These include topics related to:

- SE-1: Population Characteristics
- SE-2: Relocation and Displacement
- SE-3: Affordability
- SE-4: Ownership Opportunities

Comment SE-1: Population Characteristics

This response addresses a comment from the commenter listed below; each comment on this topic is quoted in full below this list:

A-Commissioner Antonini

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"There was one place that I spotted -- it's only a projection and it was probably done quite a while ago -- on page 4.4-4, and it talks about the population of San Francisco and it basically deals with census track 614. And this is just not that critical to the report itself, but the projected population of San Francisco on this for 2015 is 816,400. And as we'll see in our Commerce and Industry Report, the projected population of San Francisco in 2014 or 2013 is already 636,000. So, I mean, I know it doesn't

mean we have to redo any of the report, but the projection, for what it's worth, is probably not accurate, as far as the reality is concerned, right now. I can't comment on the accuracy of the census track in particular; we're just looking at the overall picture." (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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Response SE-1

This comment raises concerns regarding data in Table 4.4-2, Household Population and Household Growth in Census Tract 614 and the City and County of San Francisco 2010-2030. Specifically, the commenter states that the population in the City and County of San Francisco listed in Table 4.4-2 be updated with the Commerce and Industry Report. However, Table 4.2-2 shows household population 2015 as 816,400, not population. The U.S. Census defines household population as all U.S. residents who live in housing units such as single family homes, townhouses, apartments, and mobile homes. Population is the number of people living in an area at a specific time. The Commerce and Industry Report does not report the household population. Therefore, the information in Table 4.2-2 could not be updated.

Comment SE-2: Relocation and Displacement

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Aquino  
I-Reid

I-Schurnghammer

A-Commissioner Johnson

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"As a native San Franciscan and living in Dogpatch Neighborhood for over 11 years, would like to know if this project, "*Potrero Hope Master Plan for Potrero Annex, Potrero Terrace, and Public Housing*" will help those that live in the Public Housing now? Will they help the tenants there now get temporary homes while the project begins? Or are they being displaced?" (*Vanessa Aquino, email, January 5, 2015 [I-Aquino]*)

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• Socioeconomics and Community: This section gives a thorough explanation of the expected displacement, population growth, physical barrier, and employment effects of the proposed project and alternatives, and cites findings of "No Impact" or "Less than Significant" for each effect. These findings seem reasonable and well supported, with the exception of the displacement effects.



While some degree of temporary resident displacement is probably inevitable in this type of project, and while the project applicant cites measures such as on-site relocation, housing vouchers and rent subsidies, and a collaborative Relocation Plan, more attention should be paid to the social effects of the relocation. The text dismisses such hardships as packing, reestablishing routines and services, and changing schools as “inconveniences” and claims with minimal evidence that they would not permanently disrupt social networks. In the interest of conservatism, the displacement effect should be upgraded to “Significant” or “Less than Significant with Mitigation” and list the aforementioned measures as mandatory mitigations to ensure that they are faithfully carried out.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“We were told we had the right to move back into the new units. We also have the right to vote but there are prerequisites-have to be 18 years old, a U.S. citizen, etc. to what are the prerequisites, criteria, and stipulations to move back into the new residences?” (*Marlene Schurnghammer, letter, undated [I-Schurnghammer]*)

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“But my comments are about the population housing section, and also transit, transportation and circulation. So on the population and housing section the EIR/EIS has to consider changes to the population and housing if the rebuild will require provision of housing units in other parts of the city. So if you need to create more housing units somewhere else, then you have to consider that a physical impact of the project for population.

And I question -- I question the determination that that is not the case for this project. Unlike Alice-Griffith, where there’s an open site right next to the housing development, so you’re building the new housing while people are still living there and moving them as units are complete, for this project you need to bulldoze buildings in phases and people need to move either somewhere else on the site or probably somewhere else in the city, if there’s not enough empty units in other buildings.

And I question that given all of the efforts that are being made around the city to build new units, that there’s going to be room for the residents of complete sections of Potrero Hill and Potrero Annex and other parts of San Francisco in the phases when their section of the project are being demolished.

So I really would like more description as to the relocation plan and where those people are supposed to go.

I know relocation plans are pretty complex, there’s a lot of moving pieces to them, but we can at least talk about the projection of where these people are supposed to go, whether it’s where it is in San Francisco or even potentially where outside of the city, so we can make sure that there’s no physical

impacts in the population change.” (Commissioner Johnson, Public Hearing, December 11, 2014 [A-Commissioner Johnson])

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Response SE-2

This comment raises concerns regarding the relocation plan for Project site residents and the social effects of relocation.

Impact SC-1 in Section 5.4, *Socioeconomics Community/Population and Housing*, of the Draft EIR/EIS states that, where possible, the Proposed Project would accommodate onsite relocation of existing residents in good standing (lease compliant) during construction. The existing residents would be relocated to new onsite units, once completed, or would receive housing vouchers from the Housing Authority to relocate to existing off-site units during the construction phase. Thus, the Proposed Project does not involve the construction of additional off-site housing units for the temporary use of residents and would not result in physical impacts from the creation of new housing units elsewhere.

The relocation process would start about a year prior to construction. At this point, the Housing Authority would notify residents of opportunities to participate in the relocation planning. In addition, prior to construction, the Housing Authority would develop and release a Relocation Plan. The Relocation Plan would be developed in collaboration with tenants, the developer, Housing Authority staff, City agencies, and tenant advocates. The Plan would describe the process by which the Housing Authority plans to temporarily relocate residents to accommodate construction and would describe alternative housing options, the proposed timing of relocation, and other critical issues related to relocation. Upon completion of the draft Relocation Plan, a 30-day public review period would commence to allow the community to provide feedback prior to adoption of the Relocation Plan by the San Francisco Housing Authority Commission.

In addition, if the number of households electing to return to the Project site exceeds the number of public housing replacement dwelling units, the residents would be offered an affordable housing tax credit unit that would have a unit-based rent subsidy. The replacement public housing units developed for the Project would reflect the number of bedrooms per unit that are needed to serve the returning tenants. Therefore, although the Proposed Project could temporarily relocate residents on- and offsite during the construction phase, permanent displacement of eligible residents would not occur.

NEPA is concerned with the permanent disruption to existing social networks through the displacement of residents. As discussed in impact SC-1 in Section 5.4, residents would be required to relocate, which would involve time and effort to pack, move, and re-establish routines, including locating and accessing community and commercial services. Students may be able to continue attending their school of choice as schools are not assigned based solely on geography. Because the Proposed Project would be constructed in phases, many residents could choose to remain onsite

through the duration of construction. The environmental impacts on residents during construction are discussed in Section 5.9, *Air Quality*. Residents that choose to temporarily relocate would be given the option to return. However, during temporary relocation, these residents could experience social disruption through a temporary loss of social groups. Residents that choose to remain onsite throughout the duration of construction could experience temporary disruptions to social networks resulting from the change in site composition and potential loss of neighbors. The social effects of relocation would be temporary and would be considered less than significant. No further discussion is necessary.

### Comment SE-3: Affordability and Ownership

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)  
I-Aquino

I-Serwer and Dreschler (1)

I-Serwer and Dreschler (2)

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“I also share the concern that middle income families should have access to this housing. It seems as though it will primarily benefit those without any resources and those who can afford market rate. We had hoped it would be more integrated.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“Will this project support low and middle class working San Franciscans an opportunity back into the neighborhood? It is very very important to make these homes more affordable for those that clean our homes and take care of our children and many other services.” (*Vanessa Aquino, email, January 5, 2015 [I-Aquino]*)

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“As a lucky homeowner in San Francisco, who has lived on the South Side of Potrero Hill for almost 18 years, I have personally received the benefits of home ownership and the positive effect that has on an entire community. Often families, who own or have the opportunity to own a home, generally take care of and are invested in the quality of life and safety in their neighborhood. Given that the whole United States and particularly the San Francisco Bay Area, have experienced a hollowing out of the

middle class, “U.S. 2010 discover America in a New Century”.<sup>4</sup> I strongly believe that for the development to become a thriving environment for families of all kinds, each area of the development should offer a mix of affordable housing and ownership opportunities (i.e., rent to own), so that people of ALL income levels can be engaged stewards of their new community. Why shouldn’t, Rebuild Potrero be the most integrated new project in SF populated by a diversity of income levels and maximized ownership woven throughout the entire project. For example, The Mosaica Family and Senior Apartments at Alabama and Florida have achieved a balanced thriving community of mixed income residential, and commercial in one square block “The one-square-block site incorporates 93 units of housing for low-income families, 24 units for low-income seniors, 34 homeownership units, 11,000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment.”<sup>5</sup> (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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“Again, I support the inclusion of middle - income families to the new housing mix, which includes folks (I believe) with incomes from 84,000–140,000\$ per year and/or increase the moderate number of units to 210 units at 150% of median. I encourage the project planners to include workforce housing for teachers, firefighters, peace officers, librarians etc. as a segment of the middle class portion of the total 1,800 units. Currently, San Francisco political rhetoric touts efforts to create affordable housing for our civil work force and middle class, and this project is positioned to provide some of those badly needed

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<sup>4</sup> “U.S. 2010 discover America in a New Century Growth in the Residential Segregation. of Families by Income, 1970–2009. “A large body of research suggests that the neighborhood context one lives in can directly affect that person's social, economic, or physical outcomes (and a large range of sociological theories predict such contextual effects; see, for example, Burdick Will et al., 2011; Jencks & Mayer, 1990; Leventhal & Brooks-Gunn, 2000; Sampson, Raudenbush, & Earls, 1997). For instance, living in a severely disadvantaged neighborhood context is associated with a loss in teaming equivalent to a full year of school among black children (Sampson, Sharkey, & Raudenbush, 2008) and lowers high school graduation rates by as much as 20 percentage points (Wodtke, Harding, & Elwert, 2011). Moreover, neighborhood violent crime rates as well as the prevalence of neighborhood associations are robust predictors of birth weight, an important health outcome among infants (Morenoff 2003). This suggests that income segregation will lead to more unequal outcomes between low - and high-income households than their differences in income alone would predict because households are also influenced by the incomes of others in their community.

<sup>5</sup> [www.tnrc.org/property/mosaica-florida-alabama-street](http://www.tnrc.org/property/mosaica-florida-alabama-street). The Mosaica Family and Senior Apartments realize the full potential of mixed-use, mixed-income design principles. Mosaica became TNDC's first property in the Mission District in November 2009, when TNDC took over management of the project from the Citizens Housing Corporation. The one-square-block site incorporates 93 units of housing for low -income families, 24 units for low-income seniors, 34 homeownership units, 11, 000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment. Mixed use developments strive to build community by creating safe, communal spaces for residents to enjoy, and on a typical afternoon, the Mosaica courtyard is a vibrant scene of children playing while parents and neighbors look on. The project's commercial spaces support local entrepreneurs and are a nod to the Northeast Mission District's history as a center of light industry. This seamless weaving of housing for low - and middle-income people with places of work and recreation have earned Mosaica a Gold Nugget Grand Award for “Best Affordable Project” and made it a Finalist for Affordable Housing Finance Magazine's Readers' Choice Awards in the "Master-Planned/Mixed-Use" category.

housing units.” (Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)])

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Response SE-3

This comment raises concerns regarding the affordability of the proposed housing units and inclusion of all income levels in the Project and home ownership.

As stated in Chapter 2, *Project Alternatives/Project Description*, the Proposed Project would develop up to 1,700 housing units, of which 606 units would replace existing public housing units. The additional 1,080 units would consist of approximately 42 percent (approximately 450 units) affordable housing and approximately 58 percent (approximately 630 units) market-rate housing. Therefore, the Proposed Project would benefit both the existing residents on the Project site and middle income families in the City and County of San Francisco by providing a mix of housing available for various income levels. In total, including the 606 public housing units, approximately 63 percent of the Proposed Project units, would be affordable housing units. However, the number of units that would be available for sale as opposed to rental is currently unknown. This comment is directed toward the project description and does not regard the adequacy of the analysis of the EIR/EIS, therefore, no further response is required.

### **3.7 TRANSPORTATION AND CIRCULATION**

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.7 and 5.7, *Transportation and Circulation*, of the Draft EIR/EIS. These include topics related to:

- TR-1: Traffic Impact Study
- TR-2: Existing Traffic Characterization
- TR-3: Increased Traffic and Congestion
- TR-4: Traffic Demand Management
- TR-5: Transit Services
- TR-6: Parking
- TR-7: Pedestrian and Cyclist Mobility/Experience
- TR-8: Traffic Safety
- TR-9: Traffic Mitigation
- TR-10: Cumulative Analysis

## Comment TR-1: Traffic Impact Study

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Caltrans

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“3. Page 4.7-1, Introduction: The Transportation Impact Study (TIS) referenced (October 2012) in the plan needs to be updated. A TIS requires updating every two years. Please update the TIS to the latest Highway Capacity Manual (HCM 2010) and discuss changes.” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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“6. How were the 2030 cumulative freeway/ramps/ramp junctions volumes generated (see TIS Tables 4-9, 4-10, 4-11) and what assumptions were used? Similarly, please explain how the volumes (additional trips) were generated for the proposed project and alternatives (i.e., project contribution).” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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“10. TIS, Appendix 4.7, Figures 3-1 and 3-2: How was the project trip distribution generated?” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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## Response TR-1

These comments raise concerns regarding the date the TIS was prepared and the contents of that report. Since a typical EIR/EIS process can span anywhere from 24 to 36 months, updating a TIS every two years is not practical nor is it required by the City. The San Francisco County Transportation Authority’s Chain Activity Modeling Process (SF -CHAMP) model runs (upon which much of the TIS analysis is based) are updated based on the release of new regional growth projections from the Association of the Bay Area Governments (ABAG). Updates to ABAG data have historically been released every other year, but since 2009 updates have occurred less. Specifically, after ABAG’s 2009 projections, no updates were available again until May 2013. Prior to publication of the Draft EIR/EIS, re-running the latest version of the SF-CHAMP model, which was based on the 2013 Sustainable Communities Strategy [SCS] with a horizon year of 2040, was considered but ultimately not pursued, because the 2013 SCS projections forecasted less growth in population and employment than the model run data used the TIS, which were based on the 2009 ABAG projections—forecast at a time of economic growth. Thus, the level of service (LOS) results from a model run using the latest SF-CHAMP data

would not result in substantially different results from those reported in the TIS. In fact, if the model were re-run, it is anticipated that the revised cumulative impacts of the Project would be less than those is reported in the TIS. Hence, the impact analysis reported in the TIS is more conservative than what an updated analysis would predict.

The TIS was conducted in accordance with the San Francisco Planning Department's Transportation Impact Analysis Guidelines for Environmental Review (SF TIA Guidelines), which recommends HCM 2000 methodology but not HCM 2010 methodology. With respect to the LOS calculations, there are no substantial changes between HCM 2000 and HCM 2010. Some features regarding person delay and bike delay were added for HCM 2010, but the methodology for vehicular delay/LOS in the HCM 2010 is similar to the HCM 2000 methodology. Given this and the fact that LOS reform is imminent, the City has opted not to update to the HCM 2010 methodology.

As mentioned on Page 4-47 of the TIS, traffic volumes at the study freeway segments, ramp, and ramp junctions under 2030 Cumulative Conditions were obtained from the previously certified Candlestick Point-Hunters Point Shipyard Phase II Development Plan Environmental Impact Report, November 2009 to ensure consistency with the neighboring studies. The additional trips generated by the Proposed Project and alternatives along the freeway segments and ramps were identified using the travel demand estimation methodology discussed in Chapter 3 of the TIS. This methodology is based on the SF TIA Guidelines.

The Project trip distribution was developed using the methodology discussed in the SF TIA Guidelines and the specific information provided in the SF TIA Guidelines for the land use type and location of the Proposed Project. According to the SF TIA Guidelines, trip distribution is based on the origin/destination of a specific trip, and is separated into the four quadrants of San Francisco (Superdistricts 1 through 4), East Bay, North Bay, South Bay, and outside the region. Once the Project distribution to/from various regions was identified according to the SF TIA Guidelines, they were assigned to regional/local roadways serving those regions. A detailed discussion on the estimation of the Project trip distribution is provided in Section 3.3 of the TIS, while relevant calculations are included in Appendix I of the final report.

## Comment TR-2: Existing Traffic Characterization

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Caltrans

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"4. Section 4.7.2 Existing Conditions: Has the intersection of Pennsylvania Ave and 25th St. been analyzed? What is the control delay of this intersection? Southbound Route 280 Pennsylvania Ave

off-ramp and on-ramp currently have a weekday peak-hour demand of about 620 vehicles per hour (peak hour 3–4 PM) and 1,028 vehicles per hour (peak hour 4–5 PM), respectively. Will this project create a significant impact and cause the traffic to back up from this intersection to the southbound I-280 mainline?" (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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Response TR-2

The all-way stop-controlled intersection of Pennsylvania Avenue and 25<sup>th</sup> Street was not analyzed as part of the Project. A transportation study is currently underway for the proposed Pier 70 Mixed-Use Development project which includes intersection level of service analysis of Pennsylvania Avenue and 25<sup>th</sup> Street and Pennsylvania Avenue and the I-280 southbound off-ramp. The preliminary results (August 2015) show the four-way stop-controlled intersection of Pennsylvania Avenue and 25<sup>th</sup> Street operating at LOS C with 24.1 seconds of control delay in the PM peak hour under existing conditions. In the future cumulative year (2040) the intersection would continue to be four-way stop-controlled, and would operate at LOS F with 57.6 seconds of control delay in the PM peak hour. It should be noted that the future cumulative year assumes that the Proposed Project has been constructed and is fully occupied.

The intersection of Pennsylvania Avenue and the I-280 southbound off-ramp currently operates at LOS B with 14 seconds of control delay in the PM peak hour. In the future cumulative year (2040) the intersection would operate at LOS D with 28.4 seconds of control delay in the PM peak hour.

No queue length analysis was conducted as part of the transportation study. Impacts to these intersections would not be addressed as part of the Proposed Project, but are likely to be addressed as part of the transportation impact study for the proposed Pier 70 Mixed-Use Development project.

Comment TR-3: Increased Traffic and Congestion

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

- |                |             |                     |
|----------------|-------------|---------------------|
| I-Abel (1)     | I-Hunting   | I-O'Rourke          |
| I-Abel (2)     | I-Lee R (1) | I-Robbins           |
| I-Bergeron     | I-Lee R (2) | I-Sabre & Loura (1) |
| I-Fay (1)      | I-Lee H     | I-Sabre & Loura (2) |
| I-Montalto (2) |             |                     |
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"But the way the plan currently reads, it is clear that my other concerns (noise, congestion, pollution) will have a marked increase, and not only just during the 10 year rebuild.



I do not think it fair that my block will lose its view and be saddled with a 40 foot wall of buildings (whose occupants will then have our view), a massive increase in cars and buses on my street, which will create a canyon of noise and pollution at our doorstep, without any recompense to us at all. This hardly seems fair." (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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"Why can't the planners address the issue of increased bus traffic on this one block? As it is today, two buses cannot even pass each other on this block. I understand the block will be widened, but then you plan to add perpendicular parking and more buses to handle the increase in population. The street would need to be widened significantly in order to handle this massive increase in flow." (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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"AREA CONGESTION & TRANSPORTATION CONCERNS. Accepting that most of the proposals for the development include a significant increase in the number of homes and residents, we are concerned about congestion resulting from insufficient off-street parking, added traffic, and the rerouting of Muni lines. Due to the relatively remote location, distance from services, and the area's terrain, it is likely that residents and visitors will own more cars per capita than experience with prior developments may suggest." (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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"C. Also, additional private vehicles and Muni routes are very likely to bottleneck an already overburdened 1200 Block of Wisconsin Street. This block is a main artery for the existing Muni routes and currently experiences traffic issues as Muni drivers attempt to navigate it. We propose that any plan include a widening of lower Wisconsin Street so that busses can pass each other without stopping, and designated no-parking bus stops or bulb outs (either on Wisconsin or 25<sup>th</sup> Street.)." (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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"E. And we also advise the addition a three-way stop sign at the perilous intersection of Wisconsin & 26th Streets." (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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"1) 25th Street Traffic: Problem: Table 5.7-6 projects that roughly 50% of the evening traffic for the whole complex will go through the intersection at 25th and Texas Streets, which likely means a lot of that will be via 25th Street from Pennsylvania. In table 5.7-9, the level of service for this intersection drops by two letter grades, from A to C (the largest drop in any intersection studied),

and traffic delays double. By 2030, Table 5.7-16 says to expect it to drop further to grade D with triple the delay of the no development option.

Also, in table 5.8-4, projects a 5dB increase in noise along 25th Street from Texas to Indiana due to traffic. 5dB is roughly a 50% increase in the level of noise.

Additionally, this is a narrow road that cannot be widened due to a cliff on one side.

Proposed Solution: Reroute traffic in/out of the project area by using the much higher capacity Connecticut to Cesar Chavez street connector. Ideally, 25th Street between Texas and Pennsylvania would be closed to through traffic. At a \*minimum\*, a traffic signal should be installed at the comers of 25th/Texas and 25th/Pennsylvania that would discourage use of 25th Street to enter the project area through the use of long light times, restricted tum signals, etc." (Richard Lee, email, January 5, 2015 [I-Lee R (1)])

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"8. As referenced in the EIR, there will be a major impact to the intersections of Vermont and Cesar Chavez St and also 25th St. and Pennsylvania Street. I hope you can ensure that traffic signals will be installed in these areas to ensure safe and timely passage through these intersections." (Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke])

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"Section 3: Public space, public transportation, and road usage - The population of the Proposed Project is too large for the surrounding community, particularly in terms of the usage of public space (such as the Potrero Hill Rec Center), public transportation usage, and road usage. Of particular concern is the fact that the commuter analysis was undertaken five years ago and therefore does not reflect the rapidly evolving nature of San Francisco commuting. Substantially more commuters now commute from San Francisco to the South Bay. The Proposed Project directly countermines the SF Planning Department Goals regarding public space use, transportation usage, and road usage, and should be amended to address these inconsistencies." (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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"SECTION III - Buildings and population are too large for community: 1,700 units is a huge influx of population into this neighborhood. The EIR/EIS did not adequately address the environmental impact of this population (1,100 additional units) on the traffic patterns. The specific sections of the EIS/EIR that deals with the treatment of buildings and population that are too large for the community are Impact C-TR-1(a) and C-TR-1(b), related to traffic patterns at intersections #1-4 (S.7.11).

The traffic assessment on this report was completed prior to 2010. In the last few years, the population of the San Francisco Bay Area has grown and traffic patterns have shifted. In particular, socioeconomic changes have resulted in increased residents commuting to the South Bay. Caltrain is running at capacity, and the major commute has reversed direction, such that residents leave SF in the morning. Accordingly, the traffic predictions of this report are likely out of date and inaccurate. In particular, the entrance and exit ramp of 280 from Pennsylvania can be back up significantly during rush hour, and it can be difficult to turn on to Pennsylvania from 25th St. Furthermore, the projections contained in this report described the majority of commuters as within San Francisco. This is no longer the case in 2015. The shift will be even more drastic with residents of market-rate apartments, such as those in the Proposed Project. That majority of these residents will be gainfully employed in order to afford these apartments, and many of them will commute to the South Bay on 280, 101, or Caltrain. Caltrain is packed going south at peak hour currently, and this is without the ongoing development of the Dogpatch. The EIS/EIR report woefully fails to account for shifting demographic (they report 10% commute to the South Bay, but this will not be the base for market rate apartments). They also fail to account for the future development of the Dogpatch and other areas that are further stressing the 22<sup>nd</sup> Street Caltrain stop and the entrances and exits onto 280." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"The proposed development is too dense and too high, obliterating existing views and increasing traffic congestion beyond tolerable levels." (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

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"As currently designed, the proposed project would have a destructive impact on the surrounding neighborhood. Because Potrero Hill is shouldering two existing freeways, US 101 and I-280, there is limited access to the neighborhood from east or west directions. Existing streets such as 23rd and 17th Streets are currently taxed to the maximum with traffic and cannot be re-engineered to meet increased demand." (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

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"I am concerned about the issues with transit. There are very narrow streets going in and out of our neighborhood, especially on the south side where 25th Street is and also going out from 26th onto Cesar Chavez to get to the highways, both 280 and 101.

I've already seen increased traffic in our neighborhood before this project has even begun, and I would like to know how you plan to help mitigate the issues of coming and going from our neighborhood." (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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“But my concerns are several, and I’ll try and be brief. I am concerned about the high density. I’m concerned, in specifically, about how that is going to affect Wisconsin Street. Right now we have the majority of the bus traffic, and that is supposed to continue, yet the buses will -- there’ll be more of them. Then they turn on 25th Street and they go down the hill. So we are the block that has the most bus traffic of anywhere. We’re a very narrow street. I understand they’re going to enlarge the street and make perpendicular parking, but I’m still kind of frightened. Right now, if two buses are going up, one’s going down -- happens all the time -- there’s a gridlock on the street; we have to wait.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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“My primary concerns also have to do with the Environmental Impact Report, the topics, the three topics with significant impacts that could not be fully mitigated. This is in the EIR: Noise, air quality, and transportation. So I’m living across the street for 10 years where we can’t mitigate noise, air quality, and transportation? I work out of my home. Should I be moving? I mean, I’m not sure how to address that. I’d like the project to continue but significant impacts that cannot be fully mitigated is a little frightening.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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“However, I do have some concerns about the extra traffic that that might entail.” (*Richard Lee, Public Hearing, December 11, 2014 [I-Lee R (2)]*)

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“The corridors to 280 on-ramp, Cesar Chavez, I would just like to see how that could be worked into this plan where right now the corridor down to 280 is 25th Street and it’s a very narrow street. We put a bus line, the 48 comes down there now, that’s been going on for about four years and it can barely -- if two buses are trying to pass on there, it can’t happen. So I’m just wondering, with this kind of density, how they’ll address the infrastructure of the surrounding area to make it flow.” (*Dennis Montalto, Public Hearing, December 11, 2014 [I-Montalto (2)]*)

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“At the same time, my concerns are similar to a few other people who spoke who live directly in the area. The congestion and the traffic -- I’m trying to wrap my mind around it. And when I come home now and I’m heading down Pennsylvania Street towards 25th and I’m a half a block away and it’s during high traffic areas, I’ll sit in my car for 10 minutes. There’s no light there; it’s just stop signs. And my concern is -- and what I’d like to encourage is there’s so much building going on in Dogpatch and

Potrero Hill that I wonder how the communication is happening around the overview of traffic flow. Because we're bringing in people in terms of density, we're increasing it substantially. And I think that that really needs to be looked at and addressed and I hope that that communication happens soon." (Bonnie Bergeron, Public Hearing, December 11, 2014 [I-Bergeron])

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#### Response TR-3

These comments raise concerns regarding increased congestion in the Project area that could result from the Proposed Project. The Proposed Project is expected to increase traffic and parking demand in and around the Project site. Hence, to improve estimation of traffic generation and parking demands associated with the Proposed Project, the SF TIA Guidelines were used, as recommended by the San Francisco Planning Department. Using the Proposed Project's size (of approximately 1,700 units) and the SF TIA Guidelines, the total number of Project-related trips were estimated for various modes of transportation and distributed throughout the Project area to identify potential transportation impacts. As reported in Section 5.7, *Transportation*, of the Draft EIR/EIS, some traffic and transit-related impacts are expected to occur. Mitigation measures have been developed to address some of those impacts, and the project applicant will coordinate with the San Francisco Municipal Transportation Authority (SFMTA) to develop appropriate mitigation measures to address the remaining significant impacts. In spite of coordinating with the SFMTA to develop improvement measures, some of the impacts are expected to be significant and unavoidable.

These comments also raise concerns regarding increased auto ownership of future residents of the Project site. The street network and pedestrian improvements planned within the Project site are expected to encourage multimodal and sustainable transportation, and reduce automobile-oriented traffic. In addition, Muni routes will be partially rerouted through the Project site to better serve the Proposed Project and reduce the dependence on automobiles. This vision is consistent with the citywide goal of the SFMTA Strategic Plan, Fiscal Year 2013–Fiscal Year 2018 of making transit, walking, bicycling, taxi, ridesharing, and car-sharing the preferred means of travel. Residents of the Proposed Project are expected to have a car rate per capita similar to those of other developments within the city, if not less.

Several comments raise concern regarding narrow streets along Muni routes. All of the streets located along the Muni routes (Wisconsin, Arkansas, 25<sup>th</sup>, Connecticut, and Missouri Streets) would have either 12-foot or 11-foot wide lanes (in addition to the on-street parking supply) to accommodate two buses (one in each direction) with relative ease. These lane widths were developed in coordination with the SFMTA and are consistent with their guidelines for lane widths for streets with Muni operations. The SFMTA recommends 12-foot lanes to handle Muni operations, but only 11-foot lanes when a parking lane is available next to a travel lane, which is the case for streets located within the Project site. Additionally, these street widths are in accordance with the National Association of City

Transportation Officials (NACTO) Urban Street Design Guide, which recommends using 11-foot lanes on designated truck and bus routes in urban areas. Even though on-street parking is provided on these streets, the wide travel lanes would accommodate two buses side-by-side with relative ease, provide adequate space for cars to pass buses that are stopped during loading/unloading operations, and avoid disruption to traffic flow. In addition, pole type bus stops, potentially with bulb-outs wherever feasible and/or mandated would be provided to minimize disruption to traffic flow. The project applicant would work with the SFMTA during final street design development to develop bus stop designs, including any parking restrictions that are required in the vicinity of the bus stops to improve bus operations. The bus stops would be designed in accordance with the SFMTA's standard practice.

Commenters raised concerns regarding the intersection of Wisconsin and 26<sup>th</sup> Streets. The intersection of Wisconsin and 26<sup>th</sup> Streets is located at the southwest corner of the Project site and is currently uncontrolled. Given that the intersection of Wisconsin and 26<sup>th</sup> Streets is currently uncontrolled and would continue to be with the implementation of the Proposed Project, this intersection does not experience delays and, therefore, was not analyzed as part of the transportation impact study.

One commenter also raised concerns regarding Project traffic along 25<sup>th</sup> Street. It is anticipated that 25<sup>th</sup> Street along with Cesar Chavez Street would serve as the primary connectors between the Project site and I-280. As such, and as shown in the analysis, some of the traffic is expected to use 25<sup>th</sup> Street. However, the increase in traffic along 25<sup>th</sup> Street is not expected to worsen operations at the intersection with Texas Street to unacceptable conditions. The intersection of 25<sup>th</sup> and Texas Streets is a one-way stop-controlled intersection, with stop control for the southbound approach and no control for eastbound and westbound approaches. With the Proposed Project, the southbound approach is expected to operate at LOS D under 2030 Cumulative conditions, while the other approaches would not have any delays, as they are not stop controlled. Since LOS D is acceptable within the City and County of San Francisco, no improvements to this intersection are required.

A commenter also raised concerns regarding traffic signal installation at the intersection of Cesar Chavez and Vermont Streets. Mitigation measures have been developed for this intersection to improve traffic operations. The analysis suggested that installation of a traffic signal would improve traffic operations at this intersection. However, due to the close proximity of this intersection to the unsignalized intersection of Cesar Chavez Street and the US 101 off ramp, additional review has to be conducted. If the Proposed Project is approved, the project applicant would coordinate with the SFMTA to identify the appropriate mitigation measure for this study intersection.

These comments also raised concerns regarding outdated commuter and traffic assessment. Traffic analysis for the Proposed Project was completed and finalized in October 2012. The commuter analysis was conducted based on the SF TIA Guidelines. This document provides guidelines for estimating the number of trips generated by a project, distributing trips within San Francisco and the larger Bay Area, and estimating the mode share (i.e., the distribution of trips to various transportation modes). The SF TIA Guidelines have not changed since the traffic impact analysis report was completed and submitted

in October 2012. Additionally, according to the February 2014 Caltrain Annual Passenger Counts report, the latest available document at the time of this response, the major commute continues to be the traditional northbound direction during the AM peak period and the southbound direction during the PM peak period. The majority of the increase in Caltrain's ridership occurred in the peak directions of travel (i.e., northbound AM and southbound PM directions); the southbound trains during the AM peak period are operating below their maximum seating capacity. Further, the average weekday passenger boardings at the 22<sup>nd</sup> Street Caltrain station has increased by only about 14 percent between 2012 and 2014. Due to the reasons mentioned above, the commuter analysis conducted for this Project continues to be valid and representative of current commute patterns.

These comments also raise concerns regarding traffic along 23<sup>rd</sup> and 17<sup>th</sup> Streets. As reported in the Draft EIR/EIS, the majority of the study intersections (including those located along 23<sup>rd</sup> Street) are expected to continue to operate at acceptable levels with the implementation of the Proposed Project. The Proposed Project would result in significant traffic impacts at a few intersections, but the project applicant would coordinate with the SFMTA to develop appropriate mitigation measures at these locations in order to maintain acceptable levels of service. Also, 17<sup>th</sup> Street is located approximately six long blocks north of the Project site and is outside the study area for the Proposed Project, which is why the 17<sup>th</sup> Street intersections were not included in the analysis.

#### Comment TR-4: Transportation Demand Management (TDM)

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Caltrans

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"Thank you for including the California Department of Transportation (Caltrans) in the review of the EIR/EIS for the project referenced above. We have reviewed the document and have the following comments.

1. Caltrans encourages the City and County of San Francisco to locate any needed housing, jobs and neighborhood services near major transit facilities, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways. We also encourage Travel Demand Management (TDM) policies to encourage usage of nearby public transit lines and reduce vehicle trips on the State Highway System. These policies could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others." (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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Response TR-4

This comment encourages the development of TDM policies for the proposed Project. Development of a TDM Plan is listed as an Improvement Measure on Page 5.7-124 in Section 5.7, *Transportation*, of the Draft EIR/EIS. In support of the development of a TDM program for the Proposed Project, a long term transportation strategy recommendations memorandum was prepared for the project sponsor.<sup>6</sup> As discussed, TDM strategies currently being considered by the project applicant include measures to promote transit usage, pedestrian activity, peer-to-peer car sharing, and onsite neighborhood centers. Additional recommended TDM measures include local hiring, preferential HOV parking, carpool/vanpool, an onsite TDM coordinator providing discounted MUNI fast passes, and promoting bicycling. If the Proposed Project is approved, the TDM program would be further developed as part of the Design for Development document.

Comment TR-5: Transit Services

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Fay (1)	I-Lee R (2)	O-Potrero Boosters
I-Hunting	I-Reid	A-Commissioner Antonini
I-Lee R (1)	I-Robbins	A-Commissioner Johnson
I-Marini	A-Commissioner Wu	

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“D. To further ease the effect of increased traffic, we recommend that Muni busses on these lines be primarily hybrid electric powered.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“3) Caltrain ridership analysis. Problem: The EIR seems to indicate in table 5.7-14 that they expect the project to have virtually no impact on Caltrain ridership, despite the fact that a new bus line will run through the center of the project directly to the 22nd street Caltrain station. I suspect there will be a \*dramatic\* impact on Caltrain ridership. This is already a heavily impacted station, where often there is only standing room on the train during commute hours.



Proposed Solution: Revise the transit studies to accurately reflect the likely impact on Caltrain. Hint: it is more than 4 rides per day. Work with Caltrain to add additional trains to accommodate the increased load." (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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"4) Muni stops. Problem: The Muni changes described in figure 5.7-6 indicate that the stops for the 10 and 48 that currently are at Texas and 25th Street will be moved/replaced with new stops that are up to 4 blocks further away.

Proposed Solution: Move the 48 stop to 25th and Missouri. Reroute the 10 so that it travels east/west along 23rd Street and down Missouri to 25th Street, and add a stop at 25th and Missouri. Consider rerouting the 58 up Texas street instead of Missouri, and add a stop at 25th and Texas." (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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"Transportation and Circulation: This section contains an extended analysis of the proposed projects' expected effects on trip generation, mode split, regional distribution, and loading and parking demand, as well as effects on the Muni bus lines serving the area and bicycle and pedestrian infrastructure. The mitigation measure of contributions by the project applicant toward improvement of the 10 Townsend bus line seems reasonable in light of the expected ridership increase due to increased resident population, and this measure will benefit other neighborhoods served by the 10 Townsend as well." (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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"Also, I would like to see more -- a new bus line added into that area because I think that with, you know, perhaps tripling the number of people in there I think we're going to need another bus line to help service all those people. So that's all. Thank you very much." (*Richard Lee, Public Hearing, December 11, 2014 [I-Lee R (2)]*)

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"Also, with respect to the dealing with transit issues, there needs to be, I think, an additional use at the transit effectiveness plan as it's being carried out and not just a cursory look at it using the principle transit analysis with the pre-TEP transit lines." (*J. R Eppler-Potrero Boosters Neighborhood Association, Public Hearing, December 11, 2014 [O-Potrero Boosters]*)

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“And finally, the transportation issue, which was raised by many speakers. I mean, I think some attention should be given to looking at trying to get some sort of extension from the Third Street Light Rail that would service Potrero Hill would be a big benefit and also improvement of the existing Caltrain station that would also cause an easy commute from there to downtown San Francisco as far as other parts of the Peninsula. So I think those are a couple of areas that might solve some of the problems that everyone has talked about buses coming in, limited numbers of streets. If we had a Light Rail extension from Third Street that came onto the hill we’d probably solve a lot of problems. Then people could walk to that, rather than having to wait for the bus to come to them. Thank you.”  
*(Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini])*

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“And then for the transportation, I know people have talked a lot about transit and issues with buses getting up and down the narrow streets. Again, a lot of the streets will be re-gridded, some of them will be widened, there will be changes to the circulation patterns, so I think that that is less of an issue. The only thing that I would say is that the transit impacts included the increase in transit from the Phase I EIR for Hunters Point Shipyard/Candlestick Point. And while I do think that that’s pretty much as far as you can go in terms of projecting the future -- I mean, you can theoretically talk about Pier 70, but you really don’t know until you start seeing the first phases of those projects what’s actually going to be there and what people are going to need. But I would say that I would like to see a little bit more direct information about how the express lines that are going to be running down Third Street from Hunters Point Shipyard/Candlestick Point are going to impact the transit, the TEP lines that are planned. So right now, you know, it only talks about the Muni lines that go through the project sites, Potrero Hill and Potrero Annex, but I think that the Hunters Point Shipyard/Candlestick Point plan accounts for multiple express lines that will be going down Third Street that will be accessible to people who live in Potrero Hill and potentially alleviate some of the demand on lines like, I think the Fillmore 11 and the 10 Townsend, which will be renamed something. So I would like to see -- even if it’s already been considered, I’d like to see that at least mentioned in the EIR explicitly because I think that that’s impacted. Thank you.” *(Commissioner Johnson, Public Hearing, December 11, 2014 [A-Commissioner Johnson])*

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“There was some public comment asking to look at new bus lines. There is a lot of analysis on existing and also on the TEP. But I know there may be a process happening at the Transportation Authority right now at looking at transportation on Potrero Hill. But the more that any impacts can be looked at within this EIR to make sure that we can get all the improvements and all the additional transit that we can to this site on board as soon as -- as soon as we can align it with this project, I think that that would be very helpful.” *(President Wu, Public Hearing, December 11, 2014 [A-Commissioner Wu])*

## Response TR-5

These comments primarily raise concerns regarding increased transit ridership associated with the Proposed Project. The comment on the hybrid electric powered Muni buses is noted and acknowledged. This comment will be forwarded to decision-makers as part of this document; no further response is required as the comments do not address the adequacy of the Draft EIR/EIS.

These comments also raise concerns regarding Caltrain ridership data used in the analysis. In accordance with the SF TIA Guidelines and standard practices for projects located in San Francisco, transit analysis for this study was conducted in the peak direction of travel during the PM peak period when ridership on the transit system is at or near its peak. Caltrain service from San Francisco to the South Bay is the peak direction of travel during the PM peak period, thus the transit impact analysis was conducted on the southbound Caltrain service during the PM peak hour. The Proposed Project is primarily a residential development; hence, minimal Project-related trips are expected to access the South Bay during the PM peak hour. As such, the Proposed Project would add a minimal number of trips (about four trips) to the southbound Caltrain service during the PM peak hour.

These comments also raise concerns regarding proposed changes to the Muni routes and stops. The future Muni routes and stops reported in the Draft EIR/EIS are preliminary in nature based on discussions with the SFMTA, and the actual location of stops will be determined by the SFMTA as they relate to implementation of the Transit Effectiveness Project (TEP). The preliminary Muni routes and stops were identified in coordination with the SFMTA to maximize service to the Project site. The Muni service and stops are distributed along various north-south routes (Wisconsin, Arkansas, and Missouri Streets) to align best with the expected TEP transit route alignments, to connect properly with the remainder of the transit lines external to the Project study area, and to serve the Project site better so that the majority of the residents, especially the senior citizens, will have Muni service within a two-to-three-block radius. Additionally, concentrating all of the Muni service on one street could cause traffic flow issues due to heavy and frequent bus traffic.

The southbound Route 10 line will be rerouted from Wisconsin Street between 23<sup>rd</sup> and 25<sup>th</sup> Street to Arkansas Street with a stop at the new 24<sup>th</sup> Street. To serve the Project site, the Route 58 line will be rerouted from Pennsylvania Avenue between 22<sup>nd</sup> Street and 25<sup>th</sup> Street to go through the site on Missouri Street with stops at the 22<sup>nd</sup> Street right-of-way, at 24<sup>th</sup> Street, and a third stop between the two. The routes and stops were chosen in coordination with the SFMTA to maximize proximity to high-density housing and the 24<sup>th</sup> Street neighborhood center. According to SFMTA, the potential rerouting and locations of stops is preliminary at this time.

These comments also raise concerns regarding provision of additional Muni service. The transit analysis presented in Section 5.7, *Transportation*, of the Draft EIR/EIS concludes that the Proposed Project would result in significant impacts to two Muni routes serving the Project site under 2030

Cumulative conditions – Route 10 Townsend/Sansome and Route 48 Quintara-24<sup>th</sup> Street. The Proposed Project is expected to generate about 185 trips that would access the neighboring Muni lines during the PM peak hour. The anticipated demand is not high enough in itself to warrant a new Muni line. Additionally, there is no nexus for the Proposed Project to build an extension of the T-Third Street line. However, as mentioned in the Draft EIR/EIS, the project applicant would coordinate with the SFMTA to develop appropriate mitigation measures to the significantly affected Muni lines. Comments suggesting provision of a new Muni line and extension of the Third Street Light Rail to service Potrero Hill are noted and acknowledged, and will be passed on to the SFMTA.

The Proposed Project would include all of the changes proposed to the Muni lines operating in the vicinity of the Project site (Routes 10 Townsend/Sansome, 19 Polk, and 48 Quintara-24<sup>th</sup> Street) as part of the TEP project. A detailed discussion on the TEP changes planned within the Project area is provided in Section 5.7 (page 5.7-24). The transit analysis that was conducted for this Project took into consideration the changes planned as part of the TEP recommendations. Transit analysis for the pre-TEP Muni service were conducted under Existing Conditions (without Project), but was conducted for the modified Muni service (recommended as part of the TEP) under Existing plus Project, 2030 Cumulative, and 2030 Cumulative Plus Project conditions.

These comments also raise concerns regarding conducting a transit analysis of Muni lines that are not operating in the immediate vicinity of the Project site, especially those operating along Third Street. The transit analysis for the Proposed Project was performed using the SF TIA Guidelines. According to these guidelines, line-by-line analysis should be conducted for the transit lines that either directly serve or are in close proximity to the Project site, while screenline analysis should be conducted for all other transit lines that could serve the Project site. As such, line-by-line analysis was conducted for Muni lines 10, 48, and 58 as they would directly serve the Project site. All other Muni lines operating in the vicinity of the Project site, including those along Third and Mission Streets are grouped under Southeast Screenline (as defined in the SF Planning Guidelines) and included in the Muni screenline analysis. The results of the Muni screenline analysis are included in Section 5.7.

### Comment TR-6: Parking

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Brown  
I-Fay (1)  
I-Fay (2)

I-Lee R (1)  
I-Marini  
I-O'Rourke

I-Schurnghammer

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“I have lived at PTA for more than 30 years, it has been difficult to move through the neighborhood due to steep hills, less parking for residents in the community, and by eliminating, the parking is going

to be out of control, as well of rebuilding Potrero for over 20 years. Ex: A few years ago, SFHA established a rule for all residents stating if you owned vehicles and parked in the parking stall, you would need a permit sticker; otherwise, vehicles were going to be towed. Assigning and creating residents parking stalls would eliminate many vehicles on the streets and less vandalism. Also most important to me difficulty getting around the development but the new design would make it easier to mobilize up these steep streets especially helping the seniors." (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

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"B. Therefore, we strongly recommend that the amount of off-street parking be increased throughout the development. Similarly, we suggest that essential facilities such as mailboxes, handicapped access and parking, be dispersed throughout the development to ease congestion in any one area or street." (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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"2. SENIOR HOUSING PARKING: There is inadequate spaces for senior parking. As an active senior living on a steep hill you would not be able to go where and when you wanted to freely. Seniors more than any other age group need their own transportation. Please increase senior parking spaces." (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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"2) Mississippi Street Parking. Problem: The parking studies described in Figure 4.7-5 undertaken in the EIR fail to address the Mississippi street area, despite the fact that this area is a half block from the project area, and likely to be used for overflow parking. The study considered street parking several blocks to the north and west of the project. Why zero blocks to the east?

Proposed Solution: Add a parking study for Mississippi and 25th Street between Texas and Pennsylvania. Address any impacts on future street parking in this area by adding more parking to the southeast corner of the project." (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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"Lack of Appropriate Infrastructure: The plan fails to contemplate how residents will easily access commercial, social, educational and recreational facilities in the neighborhood. For example, it is clear from construction and trailer bungalows at Starr King Elementary School that there is already a significant need for classroom space in the immediate vicinity, let alone other facilities and services needed for multigenerational residents. However, the limited options within the planned development cannot possibly be sufficient given the density levels proposed. Moreover, as parking is severely limited and it is virtually impossible for all but the most athletically fit individuals to walk or bicycle

up the hills, it is unclear how public transit services will be able to meet all needs.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“6. The proposed parking ratio of One Covered Parking Space for every two units is not sufficient and will result in a shortage of parking for neighbors and residents of the development. I understand that CEQA allows a lower threshold, but it seems to me that this policy does not take into consideration the steep hill on which we live. This area is not suitable for much walking and biking is almost impossible due to the steep grade. Also, since the likely occupants of the new homes will be affluent enough to own a car, I hope that this important resource is planned accordingly. At a minimum, it should be One Covered Parking Space for each home. In my building, many units have two cars, so this is a realistic compromise.” (*Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke]*)

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“How are parking spaces going to be incorporated into the plan – garage, on the street?” (*Marlene Schurnghammer, letter, undated [I-Schurnghammer]*)

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Response TR-6

These comments raise concerns regarding the provision of parking at the Project site. Currently, the Project site has about 540 spaces (340 off-street uncovered spaces and about 200 on-street spaces), which would be increased to 1,655 spaces (1,055 off-street spaces and 600 on-street spaces) with completion of the Proposed Project. The Proposed Project includes many affordable and senior housing units which have a lower demand for parking per the SF TIA Guidelines. The *San Francisco Planning Code* requires a minimum of 663 off-street parking spaces, as illustrated in Table 5.7-15 of the Draft EIR/EIS. Hence, the number of off-street parking spaces provided by the Proposed Project is almost 60 percent higher than the minimum number of spaces required by the *San Francisco Planning Code*. Additionally, as shown in Table 4.7-9 of the Draft EIR/EIS, a parking survey showed 50 percent of the on-street parking spaces available within the parking study area were unoccupied, indicating about 270 available spaces. As such, the Project’s parking demand is expected to be less than the total number of parking spaces that would be available to the residents. An increase in the proposed parking supply is not warranted. A detailed discussion on the parking supply versus parking demand is provided in Section 4.2.8 of the TIS (Appendix 4.7 of the Draft EIR/EIS).

It is not recommended that the number of on-street parking spaces be reduced or that the number of off-street parking spaces be increased, since as mentioned above, parking analysis suggests that parking supply that will be available to the residents (both within and around the Project site) is expected to meet their parking demand. In addition, one of the goals of the SFMTA Strategic Plan,

Fiscal Year 2013–Fiscal Year 2018 is to make transit, walking, bicycling, taxi, ridesharing, and car-sharing the preferred means of travel. Providing parking supply in excess of the expected parking demand could encourage higher automobile ownership, which in turn would be contradictory to the SFMTA’s City-wide goal of improving sustainable transportation and reducing dependence on automobiles. Also, the provision of on-street parking serves as a traffic calming measure, reducing vehicle speeds, encouraging pedestrian and bicycle activities, and helping to not convert the local streets into major thoroughfares.

These comments also raise concerns regarding the provision of parking for the senior housing units. It is expected that a majority of the senior citizens would use transit for transportation, while a minority of them would use other modes, including automobile, bicycle, and walk. As such, the Project was designed in such a way that the senior housing units would be located close to the proposed Muni bus stops. However, to cater to the needs of senior citizens who use private automobiles for transportation, 20 off-street parking spaces would be provided, even though the *San Francisco Planning Code* has no off-street parking space requirements for senior housing.

These comments also suggest an expansion of the parking study area. All of the streets that were roughly located within a one-block radius of the Project site and easily accessible from the Project site were included in the parking study area. The Project site is well connected with the neighboring areas in all the directions, except on the east side. Accordingly, no streets located on the east side of the Project site, including Mississippi Street, were included in parking analysis. Additionally, a parking analysis within the study area suggested that about 50 percent of the on-street parking facilities were unoccupied. On-street parking conditions on Mississippi Street (north of 25<sup>th</sup> Street) and 25<sup>th</sup> Street (between Texas Street and Pennsylvania Avenue) are expected to be similar to the rest of the neighboring streets. Also, even if additional parking analysis was conducted on those two block faces, the analysis results would either increase or maintain (but not decrease) the amount of available parking supply reported within the study area and would not materially change any of the conclusions reported in the Draft EIR/EIS. Hence, conducting additional on-street parking analysis on these short street segments is not recommended.

These comments also raise concerns regarding the distribution of parking spaces and other essential facilities throughout the Project site. The proposed off-street parking spaces would be provided via below grade parking in garages. The distribution and exact locations of the off-street parking spaces is not yet determined; they would be identified following the building design phase. However, as suggested, all of the parking spaces, including the essential facilities such as mailboxes and ADA accessible parking spaces would be distributed throughout the Project site.

## Comment TR-7: Pedestrian and Cyclist Mobility/Experience

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Brown	I-Fay (1)	I-Serwer and Dreschler (2)
I-Cameron	I-Reid	A-Commissioner Johnson
I-Dhillon	I-Serwer and Dreschler (1)	

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“I have lived at PTA for more than 30 years, it has been difficult to move through the neighborhood due to steep hills, less parking for residents in the community, and by eliminating, the parking is going to be out of control, as well of rebuilding Potrero for over 20 years. Ex: A few years ago, SFHA established a rule for all residents stating if you owned vehicles and parked in the parking stall, you would need a permit sticker; otherwise, vehicles were going to be towed. Assigning and creating residents parking stalls would eliminate many vehicles on the streets and less vandalism. Also most important to me difficulty getting around the development but the new design would make it easier to mobilize up these steep streets especially helping the seniors.” (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

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“Auto-Centric Streetscape: The authors allege that the cause of crime in the neighborhood is because of winding streets. This is the most asinine argument I have heard in decades. South Central Los Angeles has square street grids. If anything, it promotes crime there. Meanwhile, Sausalito and Stockholm have winding street patterns, yet much lower crime rates.” (*Cameron Reynolds, email, January 7, 2015 [I-Cameron]*)

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“The new street grid will also create a more walkable environment to counter the extreme hills and dark and covered walking pathways.” (*Jennifer Dhillon, letter, January 6, 2015 [I-Dhillon]*)

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“G. And we know that any community will not flourish if safety and security is not a given. We voice our support for maintaining the SFPD Substation in the new development, as well as increased street lighting throughout the development, and on the adjacent streets, including, Wisconsin, 25<sup>th</sup> Street, 26th Street, Carolina and Connecticut.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“The proposed changes to the pedestrian environment, such as continuous sidewalks, bulbouts, crosswalks, and so on, will also be significant improvements to the existing condition. However, the text states that pedestrian activity within the project site is “expected to be low to moderate” (p. 518) simply because little pedestrian activity was observed under existing conditions. This statement represents an unsupported assumption that the site’s current residents will not walk to the nearby school, health clinic, retail stores, or recreation center even with improved pedestrian conditions.

It is equally likely that the existing site’s unsatisfactory pedestrian environment makes walking an unfeasible or unpleasant transportation choice, and that residents will walk if provided with necessary infrastructure and desirable destinations. The type of low expectation for the site’s residents reflected in this statement is condescending at best and should be avoided in this document.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“I am very excited about the stitching back together of the street grids and the addition of the parks, I believe this will allow for the area to finally be physically integrated into the existing street grid pattern and allow for increased pedestrian and recreational activities.” (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1 and 2)]*)

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“The other thing is for transit and transportation I thought that the -- this is more about the project and less about the analysis of the project, but if the project needs to change, the analysis will have to change as well. Certain streets are going to be realigned with the grid as well as graded to decrease their steepness while they’re rebuilding parts of this project. And I think that will change the equation for the amount of bicycle facilities that are going to be needed and wanted by the population. And I thought that the plan for bicycle facilities was woefully inadequate, and therefore the analysis of where they are supposed to go and the impact of cycling on the transit and circulation is also inadequate because the project doesn’t account for it enough. So I think that that needs to be added in some -- someone’s alternative.” (*Commissioner Johnson, Public Hearing, December 11, 2014 [A-Commissioner Johnson]*)

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#### Response TR-7

These comments raise concerns regarding pedestrian and bicycle access and safety. The Proposed Project includes realignment of the local streets and the proposed grid pattern would improve street connectivity, create a more walkable and bikeable environment to counter streets with steep grades, and to enhance road user safety. Having short blocks with intersections at frequent intervals would encourage slow and cautious driving and reduce vehicle speeds. Additionally, traffic calming

measures would be implemented as part of the Proposed Project, including provision of on-street parking and pedestrian bulb-outs at intersections. These measures would reduce travel speeds on the roadway network and improve safety for all modes. Additionally, new street, park, and building lighting would be provided throughout the Project site. These features, in addition to street realignment for better connectivity, would play a key role in enhancing personal security and creating safe public places. Accordingly, light levels shall be as specified in the San Francisco Better Streets Plan. Lighting shall be uniformly spaced, pedestrian scaled, and coordinated with street trees and site furnishings.

With regard to the level of pedestrian activity expected on and around the Project site under the Proposed Project, one of the goals of the Proposed Project is to provide a grid street network and other improvements to the pedestrian environment that would encourage non-automobile transportation modes, including walking and bicycling. As reported in Page 5.7-56 through 5.7-58 in Section 5.7, *Transportation*, of the Draft EIR/EIS, compared to existing conditions, pedestrian activity would increase with the construction of the Proposed Project; the Proposed Project is expected to generate about 500 pedestrian trips during the weekday PM peak hour. However, the majority of the pedestrian trips are expected to be either local trips (to/from the local points of interest, including proposed parks, the Starr Elementary School, the health clinic, the proposed neighborhood center, and the Potrero Hill Recreation Center) or trips to/from neighboring transit stops. Hence, with the construction of the Proposed Project, the pedestrian activity is anticipated to increase from a low level (as under existing conditions) to a moderate level, but would not be expected to increase to a high level, as for instance in a downtown or in the vicinity of a major activity center.

These comments also raise concerns regarding the need to update the analysis if the Proposed Project changes. Traffic analysis included in this Draft EIR/EIS was conducted for three project alternatives: the Proposed Project (representing the highest level of proposed development), Alternative 1 (representing a lower level of development), and Alternative 2 (representing the same level of development as under existing conditions). Traffic impact analysis results reported for the Proposed Project alternative represent those for the highest-traffic scenario. Should the number of housing units reduce in the future, corresponding traffic impacts would be less than those reported for the Proposed Project alternative. Therefore, the reported analysis represents a “worst-case scenario” and does not need to be amended. Currently, the project applicant does not have any plans to increase the maximum number of housing units.

These comments also raise concerns regarding provision of bicycle facilities. The new street layout planned as part of the Proposed Project would provide for key bicycle connections, to existing bicycle infrastructure along Cesar Chavez Street to the south and Indiana Street to the east via streets with lesser grades and without Muni routes. Texas Street would provide a north-south connection and 24<sup>th</sup> Street would connect Texas Street to the Starr King Open Space to the east. Even though these key bicycle connections are not planned as official bicycle facilities, they have the ability to be signed and marked as Class III Bicycle Routes in the future. In addition, the realignment of the streets to a grid

pattern and other improvements to the Project site are expected to increase bicycle activity within the Project site. Hence, the Proposed Project would provide on-street as well as off-street bicycle parking spaces that would meet the minimum number of spaces required by the *San Francisco Planning Code*. The on-street bicycle spaces would be concentrated on streets that are less steep and more suitable for bicycle activities. The proposed distribution of on-street spaces is included in Appendix B of the TIS (Appendix 4.7 of the Draft EIR/EIS), while exact locations of the off-street bicycle parking spaces are not yet determined; they will be determined after the building design phase. A detailed discussion on the *San Francisco Planning Code* requirements and the bicycle parking supply provided as part of the Proposed Project is provided in Pages 5.7-62 and 5.7-63 of the Draft EIR/EIS. Ridership forecasts for all transportation modes, including transit, bicycle, automobile, and walking were developed based on the SF TIA Guidelines. Increased bicycle activity was forecasted by this document's guidelines. Therefore, the traffic impact analysis conducted for this Project accounted for the expected increase in bicycle activity in and around the Project site. A discussion on the effect of bicycle activity on circulation is provided in Pages 5.7-65 and 5.7-66 of the Draft EIR/EIS.

#### Comment TR-8: Traffic Safety

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Aquino

I-Sabre & Loura (1)

I-Sabre & Loura (2)

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"In addition, I would like to receive updates on how noise, air quality and transportation will be handled. Important factor is 22nd Street corridor tends to be heavy with cars, trucks and other commercial vehicles that tend to speed. Perhaps adding signs to help reduce speed would be helpful. More and more traffic continues to grow each day with new condos open; less than one month away for the opening of UCSF Children's and Women's Hospital that we, our community are feeling the impact. Safety is critical as our neighbors have families and more are coming." (*Vanessa Aquino, email, January 5, 2015 [I-Aquino]*)

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"This proposed project more than doubles the size of the existing population with block-like, unaesthetic buildings designed only to maximize density. The proposed grid pattern with thoroughfares would create blind intersections throughout the development, contributing to unsafe conditions." (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1) and (2)]*)

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“We ask that you consider the concerns we have raised about safety and the crushing effect of excessive density in our Potrero Hill neighborhood. We are not opposed to progress. We are only opposed to blind progress.” (*Christopher Sabre and Jean Louira, email and letter, January 5, 2015 [I-Sabre & Louira (1) and (2)]*)

Response TR-8

These comments raise concerns regarding traffic safety. Creating a safe and secure community is one of the primary goals of the Proposed Project. As such, the existing roadway layout is proposed to be converted to a grid street pattern. The grid street pattern would not only create more north-south and east-west connections that would tie the new development physically and socially into the surrounding neighborhood, but would also improve traffic safety. A grid street pattern improves access for emergency vehicles and reduces their response times during an incident; increases the safety and efficiency of service-providing vehicles such as street sweeping and garbage collection vehicles; and promotes alternate modes of transportation (supported by the provision of wide sidewalks, mixed-use lanes, crosswalks at all intersections, new bus stops in the vicinity of the Project site, and new pedestrian and bicycle connections), thereby reducing automobile traffic and improving roadway safety. This layout would result in more intersections; however, all of the new intersections would be stop-controlled (either one-way, two-way, or all-way) and would have only one mixed-flow lane in each direction. Having short blocks with intersections at frequent intervals would not create major thoroughfares, but would encourage slow and cautious driving and reduce vehicle speeds. Additionally, traffic calming measures would be implemented as part of the Proposed Project, including provision of on-street parking and pedestrian bulb-outs at intersections. These measures would reduce travel speeds on the roadway network. Also, the realignment of the diagonally aligned Dakota Street between 23<sup>rd</sup> and 25<sup>th</sup> Streets to north-south direction is expected to eliminate or reduce speeding issues currently observed along Dakota Street.

The 22<sup>nd</sup> Street corridor falls within the area designated for traffic calming improvements as part of the Eastern Neighborhoods Area Plan. Additionally, as part of the Dogpatch 22<sup>nd</sup> Street Greening Master Plan, traffic calming improvements were identified along 22<sup>nd</sup> Street between Pennsylvania Avenue and Third Street. Some of the improvements are already implemented on the 22<sup>nd</sup> Street. The improvements are being implemented from east to west starting from the Third Street. It is expected that the rest of the planned traffic calming improvements would be implemented along 22<sup>nd</sup> Street upon availability of funds. The project applicant shall coordinate with SFMTA and circulate any update available on these planned improvements.

Comment TR-9: Traffic Mitigation

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

## A-Caltrans

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“7. Page 5.7-101 to 5.7-104, C-M-TR-1a, -1b, -1c, and -1d: Please address fair share contribution when proposed mitigation measures are identified on State right of way. As the lead agency, the City and County of San Francisco is responsible for all project mitigation, including any needed improvements to the State Highway System. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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“8. Page 5.7-102, C-M-TR-1b: Will the lane width be able to accommodate the additional left turn pocket without impacting the opposing traffic at this intersection? Discussion of traffic signal is missing.” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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## Response TR-9

The Proposed Project is expected to result in some significant impacts to the study freeway segments and ramp junctions. At the study intersections, as mentioned in the Draft EIR/EIS on pages 5.7-99 through 5.7-108, mitigation measures have been developed for the intersections where significant traffic impacts are expected; however, mitigation measures for most of the study intersections have not been finalized. If the Proposed Project is approved, the project applicant would coordinate with SFMTA to analyze the appropriateness of signalization or similar improvements at the intersections that are significantly affected by the Proposed Project. Upon identifying the feasible mitigation measures, SFMTA, in coordination with the project applicant, shall identify and discuss the Project’s fair share contribution, financing, scheduling, implementation responsibilities, and lead agency monitoring.

The width of the eastbound approach at the 25<sup>th</sup> Street/Indiana Street intersection is about 21.5 feet. Therefore, as mentioned on page 5.7-102 of the Draft EIR/EIS, the elimination of two on-street parking spaces would be sufficient to provide a left turn pocket along the eastbound approach. As mentioned on page 5.7-101 of the Draft EIR/EIS, the Peak Hour Signal Warrant would be met at this intersection under 2030 Cumulative Plus Project Conditions. However, only one approach, the eastbound approach, is anticipated to operate at LOS D or worse under 2030 Cumulative Plus Project Conditions; the other two approaches would operate at LOS C or better. Hence, Mitigation Measure C-M-TR-1b to improve operating conditions along the eastbound approach was preferred to the installation of a traffic signal, which would unnecessarily affect traffic operations along all of the approaches.

Therefore, installation of a traffic signal was not pursued and its relevant discussion was not included in the report.

It should be noted that, based on the preliminary findings of the transportation study for the Pier 70 Mixed-Use Development project, the intersection of 25<sup>th</sup> and Indiana Streets is expected to operate at LOS E, with a control delay of 36.6 seconds in the future year 2040, without the Pier 70 project. The eastbound approach would operate at LOS C with a 16.2 second control delay, and the westbound approach would operate at LOS F with a 60.9 second control delay. Therefore, it is possible that intersection improvement may be recommended as part of that project.

Furthermore, the Draft EIR/EIS concludes that Mitigation Measures C-M-TR-1a through C-M-TR-1d for the Proposed Project and Reduced Development Alternative require the project applicant to contribute a fair-share payment to impacts at affected intersections. Due to the uncertainty of these mitigation measures, this cumulative impact is considered significant and unavoidable.

### Comment TR-10: Cumulative Analysis

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Caltrans

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“9. Please utilize the future traffic volumes and conduct a traffic signal warrant analysis, per Section 4C.011 (II) of the California Manual on Uniform Traffic Control Devices, to ensure that at least one signal warrant is satisfied for each of the following intersections:

- Intersection #3 (Pennsylvania Avenue/Southbound Route 280 Off-Ramp)
  - Intersection #4 (25<sup>th</sup> Street/Indiana Street/Northbound Route 280 On-Ramp)
  - Intersection #13” (Cesar Chavez Street/Route 101 Off-Ramp)” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans ]*)
- 

“11. The report only shows PM turning movement traffic per study intersection under Existing, Growth Only, Project Only, 2030, and 2030 Cumulative+ Project Conditions. Traffic patterns for AM peak should also be analyzed under CEQA. AM peak traffic is a worse scenario in the opposite directions compared to PM peak traffic. Therefore, under Existing, Growth Only, Project Only, 2030, 2030 Cumulative+ Project Conditions, we recommend the report include an AM (PM) trip generation table and AM (PM) turning movement traffic per study intersection, which covers near-by on-/ off-ramps of US 101 and I-280.” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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Response TR-10

As part of the TIS, signal warrant analyses using the future peak hour volumes were conducted at all of the three intersections mentioned above. All of the three intersections met the Signal Warrant 3 (Peak Hour Signal Warrant) from the California Manual on Uniform Traffic Control Devices. The signal warrant analyses worksheets are included in Appendix K of the Draft EIR/EIS.

The SF TIA Guidelines typically recommend the evaluation of traffic operations during the PM peak hour, since it is the time period when the peak usage on the majority of the transportation system occurs. Further, most of the transportation system's capacity and service are observed to be at a maximum during the PM peak hour. Accordingly, to be consistent with the SF TIA Guidelines, traffic analysis in this study was conducted during the PM peak hour. However, four of the study freeway segments where traffic operational issues were anticipated were evaluated during both the AM and PM peak hours.

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## 3.8 NOISE

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.8 and 5.8, *Noise*, of the Draft EIR/EIS. These include topics related to:

- NO-1: Construction Noise
- NO-2: Operational Noise

Comment NO-1: Construction Noise

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (2)

I-Reid

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“Noise: This section cites two significant impacts due to noise generated by the project. The first concerns excessive but temporary noise from heavy equipment, power tools, and so forth during the construction process; this impact will be mitigated to “Less than Significant” levels by the development and implementation of a Construction Noise Plan.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“My primary concerns also have to do with the Environmental Impact Report, the topics, the three topics with significant impacts that could not be fully mitigated. This is in the EIR: Noise, air quality, and transportation. So I’m living across the street for 10 years where we can’t mitigate noise, air quality, and transportation? I work out of my home. Should I be moving? I mean, I’m not sure how to address that. I’d like the project to continue but significant impacts that cannot be fully mitigated is a little frightening.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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Response NO-1

These comments raise concerns regarding construction noise associated with the Project. The commenter has accurately summarized the significance of the construction noise impacts.

During the 10-year construction period noise impacts would be mitigated to less-than-significant levels. As discussed under Impact NO-1, in Section 5.8, *Noise*, implementation of Mitigation Measures M-NO-1a and M-NO-1b would ensure impacts related to construction noise are less than significant. However, the Draft EIR/EIS discloses that operational noise from the increase in Project-related traffic on local roadways would be significant and unavoidable, because ambient noise would increase in some locations by more than 3 dBA, which is the adopted threshold for a “substantial permanent increase” assumed for the analysis. However, none of the roadway segments modeled in the Project area would have a noise level that exceeds 70 dBA L<sub>dn</sub>; therefore, assuming a standard exterior-to-interior attenuation rate of 25 dBA for typical residential buildings with doors and windows closed, interior noise levels would not exceed 45 dBA L<sub>dn</sub> at existing residential uses (70 dBA exterior noise - 25 dBA attenuation = 45 dBA interior noise). Thus, the significant operational noise impacts from increased traffic are not likely to disturb onsite residents. In addition, although increased traffic noise would lead to impacts that are significant, the exterior noise standard of 65 dBA L<sub>dn</sub> would not be exceeded.

Comment NO-2: Operational Noise

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)

I-Lee R (1)

I-Reid

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“But the way the plan currently reads, it is clear that my other concerns (noise, congestion, pollution) will have a marked increase, and not only just during the 10 year rebuild. I do not think it fair that my



block will lose its view and be saddled with a 40 foot wall of buildings (whose occupants will then have our view), a massive increase in cars and buses on my street, which will create a canyon of noise and pollution at our doorstep, without any recompense to us at all. This hardly seems fair.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“1) 25th Street Traffic: Problem: Table 5.7-6 projects that roughly 50% of the evening traffic for the whole complex will go through the intersection at 25th and Texas Streets, which likely means a lot of that will be via 25th Street from Pennsylvania. In table 5.7-9, the level of service for this intersection drops by two letter grades, from A to C (the largest drop in any intersection studied), and traffic delays double. By 2030, Table 5.7-16 says to expect it to drop further to grade D with triple the delay of the no development option. Also, in table 5.8-4, projects a 5dB increase in noise along 25th Street from Texas to Indiana due to traffic. 5dB is roughly a 50% increase in the level of noise. Additionally, this is a narrow road that cannot be widened due to a cliff on one side.

Proposed Solution: Reroute traffic in/out of the project area by using the much higher capacity Connecticut to Cesar Chavez street connector. Ideally, 25th Street between Texas and Pennsylvania would be closed to through traffic. At a \*minimum\*, a traffic signal should be installed at the corners of 25th/Texas and 25th/Pennsylvania that would discourage use of 25th street to enter the project area through the use of long light times, restricted turn signals, etc.” (*Richard Lee, letter, January 5, 2015 [I-Lee R (1)]*)

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“A missing element that should have been addressed in this section is the possible impact of ambient noise from the surrounding highways, rail lines, and other sources upon the residents of the site. The project applicant may have no means of addressing these sources given the existing site’s location and context, but their impacts should be documented out of concern for residents’ health and quality of life. The project applicant should then use this documentation, together with the finding of a significant increase in traffic noise, to support the specification of additional acoustic insulation in the housing units’ exterior walls.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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#### Response NO-2

These comments raise concerns regarding operational noise resulting from the Project. As discussed under Impact NO-3 in Section 5.8, *Noise*, of the Draft EIR/EIS, the Project-related increase in exterior traffic noise associated with operation of the Project (for the Existing Plus Project Conditions) would be significant and unavoidable for eight roadway segments in the Project area. The eight segments represent a small proportion of the roadway network affected by the Project, and, even at these

segments, Impact NO-1 discusses that the interior noise standard of 45 dBA  $L_{dn}$  and exterior noise standard of 65 dBA  $L_{dn}$  would not be exceeded as a result of the Project. Thus, noise within the interior of existing residences would still be within the applicable standards. In addition, traffic noise at the proposed open space areas along the roadways with a substantial noise increase would not experience noise levels that exceed the City's 60 dBA  $L_{dn}$  standard.

Noise along 25<sup>th</sup> Street from Dakota Street to Indiana Street would increase by 5 dBA  $L_{dn}$  for the Existing Plus Project Conditions relative to the Existing Conditions, with an existing noise level of 53 dBA  $L_{dn}$  (Table 5.8-4 of the Draft EIR/EIS). This would be an increase of 9 percent ( $5/53=0.09$ ). Potentially closing off a portion of the Project site to through traffic would only exacerbate noise-related issues elsewhere in the Project vicinity. Similarly, the installation of a traffic signal at the intersections of 25<sup>th</sup> and Texas Streets and/or 25<sup>th</sup> and Pennsylvania Streets would not eliminate the increase in traffic noise on segments of 25<sup>th</sup> Street because the signal would not necessarily reduce traffic volumes.

With regard to the effect of noise sources on the new residents of the Project site, page 5.8-17 of the Draft EIR/EIS discusses the combined background noise and the HUD exterior noise standards. Under the *HUD Standards – Combined Operational Noise Levels* subsection, the background noise sources, including local traffic, Interstate 280, Caltrain operations, and aircraft overflight, are individually specified, and it is concluded that the Project combined background noise would not exceed HUD's 65 dBA  $L_{dn}$  exterior noise standard. In section 4.8, *Noise*, of the Draft EIR/EIS, noise measurements conducted in the Project area, which captured the existing ambient noise levels, are shown to be below 65 dBA  $L_{eq}$  at all measurement sites. In addition, it is discussed on page 5.8-14 that the Project would be required to comply with Title 24 of the California Building Code, which requires that all residential units achieve an interior noise level of 45 dBA. Thus, sufficient acoustical insulation would be incorporated as part of the Project design in order to comply with Title 24.

### 3.9 AIR QUALITY

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.9 and 5.9, *Air Quality*, of the Draft EIR/EIS. These include topics related to:

- AQ-1: Construction Emissions
- AQ-2: Sensitive Receptors and Health Risks
- AQ-3: Operational Air Quality and Energy Efficiency
- AQ-4: Article 38
- AQ-5: Volatile Organic Compounds

## Comment AQ-1: Construction Emissions

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA  
I-Abel (2)

A-BAAQMD  
I-Reid

I-Brown

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“Air Quality-Construction-phase impacts: The DEIR/DEIS identifies significant and unavoidable air quality impacts during the construction phase due to emissions of oxides of nitrogen (NO<sub>x</sub>) above the significance threshold used in the analysis (p. 5.9-25). In addition, the analysis predicts a significant health risk impact from excess cancer risk, as evaluated in the Health Risk Assessment, as well as significant concentrations of particulate matter emissions less than 2.5 microns (PM<sub>2.5</sub>) for a resident living at the project site during the construction phase 1 (p. 5.9-35). However, the project proposes substantial mitigation measures to reduce these impacts and all impacts would be less than significant with mitigation except for the increases in NO<sub>x</sub> emissions, which, while remaining significant, would have negligible impacts on human health, according to the DEIR/DEIS.

Notwithstanding this conclusion, we recommend that the San Francisco Planning Department and HUD seek opportunities to reduce construction-phase truck emissions where possible. One possibility could be attempts to balance cut and fill volumes to reduce truck trips. Because the project site has hilly topography, grading of over 248,000 cubic yards is expected over the three construction phases, with the number of truck trips ranging from 3,550 to over 14,000 (depending on truck size). Phase 2 would require 77,810 cubic yards of fill be imported to the site, while Phase 3 would require the export of 51,250 cubic yards from the site (p. 5.7-75). It is not clear if efforts to balance cut and fill to reduce truck trips have been explored.” (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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“Additionally, the project site contains naturally-occurring asbestos. The DEIR/DEIS states that the Bay Area Air Quality Management District requires construction contractors to prepare an asbestos dust mitigation plan specifying measures that would be taken to ensure that no visible dust crosses the property boundary. The asbestos dust mitigation plan must also include an asbestos air monitoring plan if residences, businesses, hospitals, and other receptors are located within 0.25 mile of any boundary of an area to be disturbed (p. 5.18-19). Because there will be receptors on the site as well as within in the required buffer area that will require an air monitoring plan, it appears this mitigation measure needs to be modified to account for on-site residents.

*Recommendation:* Ensure that mitigation measures M-AQ-2a and 2b, which require efficient construction equipment (including Tier 4 off-road engines after 2016), are implemented, as well mitigation measure M-AQ-4 - the preparation of a Construction Emissions Minimization Plan.

Identify whether the balancing of cut and fill volumes, such as altering the phasing of construction to reduce truck trips from soil import to and export from the site, has been explored and commit to this measure in the Final EIS if this hasn't already been considered.

Include a mitigation measure to address naturally-occurring asbestos that modifies the BAAQMD requirement for a dust mitigation and monitoring plan to account for, and adequately protect, residences living on-site during construction of other phases of the project." (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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"Air District staff has the following comments on the DEIR: The DEIR concludes that there is a significant and unavoidable impact due to nitrogen oxides (NOx) emissions during the construction phase, which is estimated to last ten years. To mitigate this impact the DEIR identifies a number of measures to reduce construction emissions. However, there are additional measures that are feasible and would further reduce this project's significant NOx impacts. Therefore, the Air District recommends that the City consider requiring the following additional measures as part of Mitigation Measures AQ-2a, 2b, and 4:

- Require that all on-road trucks that haul materials to and from the construction site meet 2010 on-road engine standards.
- Require that all off-road construction equipment meet Tier 4 Interim standards by 2015. Tier 4 Interim engines have been available since 2011 and therefore should be deployed for this Project from the beginning of construction activities. This would reduce NOx emissions from all equipment, particularly from the larger engines needed for demolition that produce more emissions during use, as compared to equipment with smaller engines.
- Require any diesel back-up generators, used when grid energy is not available on the construction site, meet Tier 4 Interim standards." (*Bay Area Air Quality Management District, letter, January 7, 2015 [A-BAAQMD]*)

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"I honestly feel the need for change and supporting the process, only if the containment of dust and chemical will be handle properly while some tenants decide to stay on the premises. Growing up in low-income housing had a lot of disadvantages, challenges, and barriers to overcome I have made it,

but most have not. I support only if the constructors will properly contain the dust and chemicals while residents are on site.” (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

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“Air Quality: This section correctly notes that the construction process for this project will result in significant air quality impacts due to excessive emission of air pollutants. Sources will include on-road and off-road construction vehicles, vehicles used for transportation to and from the site, diesel generators, off-gassing from building materials, and airborne dust generated by construction activities. The document also notes that, without mitigation, these emissions will result in a significant increase in lifetime cancer risk for nearby residents and school children.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“My primary concerns also have to do with the Environmental Impact Report, the topics, the three topics with significant impacts that could not be fully mitigated. This is in the EIR: Noise, air quality, and transportation. So I’m living across the street for 10 years where we can’t mitigate noise, air quality, and transportation? I work out of my home. Should I be moving? I mean, I’m not sure how to address that. I’d like the project to continue but significant impacts that cannot be fully mitigated is a little frightening.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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Response AQ-1

These comments raise concerns regarding identified impacts associated with construction of the Project. The overall health risks resulting from air quality-related impacts are correctly summarized.

Efforts have been made and would continue to be made to try to balance the amount of earthwork for the Project. The project applicant has undertaken a number of adjustments in the grading design to attempt to reduce the amount of both cut and fill for the Project. Along with reducing the environmental impacts associated with earthwork operations by reducing truck trips and heavy equipment operation, it is economically advantageous to the Project to attempt to bring the earthwork into balance as much as possible. The analysis in the Draft EIR/EIS reflects the worst-case scenario that could occur during construction, so it is possible that actual truck trips could be more balanced across construction phases, resulting in fewer emissions. However, the worst-case phasing schedule and construction operations assumed for the analysis remains a possibility.

Upon certification of the EIR/EIS and adoption of the Mitigation Monitoring and Reporting Program, mitigation measures M-AQ-2a, M-AQ-2b, and M-AQ-4 will be required by law and must be implemented by the project applicant during construction of the Project.

BAAQMD acknowledged the adequacy of the Draft EIR/EIS, but suggested adding additional mitigation related to on-road engine standards. The City has modified Mitigation Measure M-AQ-2a to the Draft EIR/EIS to require the project applicant meet 2010 engine standards for on-road trucks during construction. This mitigation measure has also been revised to require that backup diesel generators adhere to the same emission standards as construction equipment based on comments discussed further below. This revision does not change the significance conclusions of the Draft EIR/EIS.

**Mitigation Measure M-AQ-2a – Utilize Efficient Construction Equipment at the Start of Construction.** For construction activities occurring in year 2015, all off-road construction equipment greater than 50 horsepower (hp) shall have engines that meet or exceed USEPA or ARB Tier 3 off-road emission standards, or the project applicant must prepare a construction emissions minimization plan designed to reduce NO<sub>x</sub> by a minimum of 39 percent from Tier 2 equivalent engines. In addition, for the Project construction period, all trucks that haul materials to and from the Project site shall have engines that meet or exceed ARB 2010 On-Road Engine Standards to the extent feasible. Where access to alternative sources of power are available, backup diesel generators shall be prohibited. If access to alternative sources of power is not available, backup diesel generators shall meet USEPA Tier 4 Interim emissions standards.

This would reduce the Project's air quality impacts, but there is no substantial evidence, however, indicating that inclusion of this construction mitigation measure would reduce the significant NO<sub>x</sub> impacts to a less-than-significant level. Mitigated NO<sub>x</sub> emissions would exceed the BAAQMD threshold by a maximum of 63 percent, without the 2010 on-road engine standard mitigation measure. Including such a requirement would only affect on-road vehicles and would not result in a substantial enough reduction to mitigate emissions since they are generated from multiple sources. In addition, the analysis already assumes that a portion of the trucks would have model years post-2010, so the 2010 on-road engine standard mitigation would not further reduce emissions from these trucks.

While the requirement that off-road construction equipment meet Tier 4 Interim standards in 2015 would reduce the overall volume of criteria air pollutants generated during construction, the Draft EIR/EIS indicates that the Project's impacts would be less than significant with the mitigation in 2015. Thus, there is no nexus for requiring additional mitigation for 2015 construction activities. Tier 4 interim off-road emissions standards are required by Mitigation Measure M-AQ-2b for construction equipment utilized after 2016. During this timeframe (after 2016), significant and unavoidable NO<sub>x</sub> emissions would likely occur. During 2015-2016 construction activities, however, no significant and unavoidable impacts would occur; therefore, requiring mitigation in 2015-2016 is not necessary.

BAAQMD suggested adding mitigation for back-up diesel generators. Mitigation Measure M-AQ-2a (as noted above) and M-AQ-2b on Page 5.9-21 of the Draft EIR/EIS has been revised to include additional requirements that the project applicant use grid energy for or meet Tier 4 interim standards

for diesel back-up generators. This revision does not change the significance conclusions of the Draft EIR/EIS.

**Mitigation Measure M-AQ-2b – Utilize More Efficient Construction Equipment after 2016.**

For all construction occurring after 2016, all off-road construction equipment greater than 50 hp shall have engines that meet or exceed USEPA or ARB Tier 4 interim off-road emission standards, or the project applicant must prepare a construction emissions minimization plan designed to reduce NO<sub>x</sub> by a minimum of 21 percent from Tier 3 equivalent engines. Where access to alternative sources of power are available, backup diesel generators shall be prohibited. If access to alternative sources of power is not available, backup diesel generators shall meet USEPA Tier 4 Interim emissions standards.

Because back-up generators would be a minor component of the Project's overall construction activities and the difference in emissions between Tier 3 and Tier 4 standards is small compared to the maximum NO<sub>x</sub> emissions exceedance (63 percent maximum above the BAAQMD threshold, as discussed above), this requirement would marginally reduce criteria air pollutant emissions but would not reduce the significant and unavoidable NO<sub>x</sub> emissions to a less-than-significant level.

The Project would be required to comply with the San Francisco Construction Dust Control Ordinance, which requires the implementation of specific dust control measures. As noted in Section 5.9, *Air Quality*, of the Draft EIR/EIS, individual dust control measures have been shown to reduce fugitive dust by 30 to 90 percent. Page 5.9-26 of the Draft EIR/EIS lists the specific measures that the project applicant would be required to implement during construction to reduce fugitive dust emissions. Release of naturally occurring asbestos into the air would also be minimized through the dust control plan, addressed in Response HZ-3, below.

While the impacts to regional air quality cannot be fully mitigated, the health impacts as a result of the Project were found to be less than significant with mitigation. For a resident living across the street from the Project site during the 10-year construction period, the cancer risk would not exceed the USEPA-recommended threshold of 100 excess cancer risk per million people exposed, with mitigation implemented. In addition, the health risk assessment utilized conservative assumptions in the analysis, so the results indicated in the Draft EIR/EIS represent a worst-case scenario. The actual health impacts and cancer risk could actually be lower than reported because of the conservative assumptions used in the analysis.

## Comment AQ-2: Sensitive Receptors and Health Risks

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-BAAQMD

I-Wang

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“It should also be noted that there will be sensitive receptors (children and the elderly) living within the construction site during demolition and construction activities. The diesel particulate matter (DPM) emissions (classified as a toxic air contaminant by the California Air Resources Board) from demolition and construction activities can have acute and chronic adverse health impacts on these sensitive receptors. The mitigation measures recommended above will also serve to reduce DPM emissions, and therefore reduce the health risk to these sensitive receptors.” (*Bay Area Air Quality Management District, letter, January 7, 2015 [A-BAAQMD]*)

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“My concerns about the development are pretty specific and relate to the health risks associated with the construction activities. My 2 children attend Starr King Elementary School - which is located right across the street from the proposed development. Ever since I heard about this development it has worried me that my kids will have greater exposure to lead, asbestos or other toxic substances due to this construction.” (*Suling Wang, email, January 6, 2015 [I-Wang]*)

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“Generally I don’t worry about every construction site I pass by, but the Potrero development is exceptional, because it is going to go on for years and the potential for serious long-term health risks is great. The development is so huge and it is on top of serpentine rock - which contains naturally occurring asbestos. The asbestos in the rock and soil will be disturbed and released into the air during grading and removal. The dust control measures sound complicated and laborious. It seems like it would be easy to not follow all of them everyday for 10+ years unless there is a lot of oversight.

The potential exposure from this and other construction activities and toxins to the surrounding community is significant and for some children in the neighborhood the construction activities will last the greater part of their childhood, which is a time when exposure to such toxins has a greater and more serious effects on long term health than it would on adults in the form of respiratory illnesses and increased risk of cancer.

I have been studying the Draft EIR and focusing on the sections relating to air quality and hazards during construction. It seems that by law there are many mitigation measures that will be required by various agencies that are meant to reduce the health hazard to “Less than Significant” for many -but not all- health hazards. In the back of my head, I worry that “Less than Significant” is still not the same as zero. Some negative health impact on the community and my kids is unavoidable.” (*Suling Wang, email, January 6, 2015 [I-Wang]*)



## Response AQ-2

These comments raise concerns regarding health risks associated with the construction of the Proposed Project including exposure to diesel particulate matter (DPM), lead, asbestos, and other toxic air contaminants. Asbestos emissions into the air would be limited because the Project would comply with BAAQMD regulations and would implement a number of mitigation measures to minimize the release of asbestos. Oversight of asbestos removal operations are conducted by the BAAQMD, which engages in random inspections of the removal activities. In addition, the BAAQMD will conduct an inspection if a complaint has been received.

As discussed in the Health Risk Assessment Methodology in Section 5.9, *Air Quality*, of the Draft EIR/EIS, a number of factors are incorporated into the analysis of health risks that account for different types of receptors. These factors include breathing rates, exposure duration and frequency, and age sensitivity factors. Thus, the mitigated cancer risk and PM2.5 concentrations for a daycare child and school child shown in Tables 5.9-10 and 5.9-11 of the Draft EIR/EIS, respectively, account for the greater sensitivity that pollutant exposure has on children. The tables in the Draft EIR/EIS reflect this and show that the cancer risk and PM2.5 concentrations are below the thresholds for a daycare child and school child. The health risk analysis results for school children reflect the health risks that would affect students at Starr King Elementary School.

While Mitigation Measure M-AQ-4 will reduce cancer risk and PM2.5 concentrations and the associated health risks, the Project does not have a “No Impact” finding for these impacts. Thus, there would not be zero risk. The increased risk due to the Project would be within the USEPA’s range for acceptable cancer risk (100 per one million). Cancer risk represents the likelihood that 100 people out of one million equally exposed people, using the USEPA’s threshold for acceptable cancer risk as an example, would contract cancer if exposed continuously for 24 hours per day to the pollutant concentration over 70 years.<sup>7</sup> Even if the Project were not to be constructed there would be an inherent risk of living in the area due to the existing sources of pollutants that exist in any populated area, this is particularly true for the Project area, which is an urban area with high volume roadways and is near the Caltrain tracks, the 22<sup>nd</sup> Street Caltrain station, and I-280. The Project would increase the background health risks, but the cumulative increase in cancer risk and PM2.5 concentration were found to be not significant based on widely-used and reputable thresholds.

As discussed in Section 5.18, *Hazards and Hazardous Materials*, the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California in accordance with regulations specified in CCR Title 8. The Cal/OSHA workplace regulations have been promulgated over time and are effective in reducing potential risks to workers to the extent required

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<sup>7</sup> Source: USEPA: <http://www.epa.gov/nata2002/natafaq.html#A6>

by law. Such measures including reducing the amount of time a worker might be exposed to a hazardous material and the use of personal protective equipment, along with training programs.

### Comment AQ-3: Operational Air Quality and Energy Efficiency

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA  
I-Abel (1)

I-Serwer and Dreschler (1)

I-Serwer and Dreschler (2)

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“Air Quality Mitigation: The project would be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) standards (p. 2-6) and the design process for the proposed project will be guided by the *San Francisco Planning Code* (p. 2-1) which reflects the latest smart growth policies (p. 5.10-12). The DEIR/DEIS does not specify whether photovoltaics would be incorporated into the project. It does identify the LEED credits for incorporating renewable energy into the project, and identifies the requirements for new commercial buildings to provide on-site renewable energy or purchase renewable energy credits (p. 5.10-17). Because criteria pollutants would be emitted from area sources during the operational phase as a result of natural gas combustion for heating and other uses (p. 5.10-15), incorporating photovoltaics into the project design would help mitigate impacts from criteria and greenhouse gas emissions.

The DEIR/DEIS does not state whether residential units would contain wood-burning fireplaces but does identify wood burning in fireplaces as a source of fine particulates (p. 4.9-4) and black carbon as a major contributor to global climate change (p. 4.10-1).

*Recommendation: Consider incorporating photovoltaics into the project design. Consider excluding wood-burning fireplaces from the project to reduce adverse health effects caused by particulate matter pollution.” (United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA])*

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“But the way the plan currently reads, it is clear that my other concerns (noise, congestion, pollution) will have a marked increase, and not only just during the 10 year rebuild. I do not think it fair that my block will lose its view and be saddled with a 40 foot wall of buildings (whose occupants will then have our view), a massive increase in cars and buses on my street, which will create a canyon of noise and pollution at our doorstep, without any recompense to us at all. This hardly seems fair.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“Many aspects of the project are environmentally ambitious and commendable, for example the buildings will meet a high LEED certification. The project planners should maximize the solar and green roof potential of the site, to be a solar/green roof model for the rest of the city.” (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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### Response AQ-3

These comments recommend incorporation of photovoltaic technology and maximization of solar panel and green roof potential into project development. Under the Proposed Project, the Project site would be developed with up to 1,700 new housing units, parking, up to 15,000 sf of retail/flex space, and up to 35,000 sf of community space and would comply with Title 24 of the California Code of Regulations and the City’s Green Building Code. As the commenter noted, per San Francisco Green Building Requirements for Renewable Energy, the Proposed Project would be required to provide onsite renewable energy or purchase renewable energy credits. To comply with these regulations, the Proposed Project would include solar hot water and photovoltaics. Although green roofs are not proposed, the Proposed Project would be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) standards. The Proposed Project would not include wood burning fireplaces.

The Proposed Project includes multiple measures to reduce air quality emissions and promote environmental practices. Bicycle facilities would be installed at various locations throughout the Project site, and linkages to existing city bike networks would be improved, thereby improving mobility and encouraging the use of an alternative mode of transportation. In addition, street and landscape design and roadway accommodations, including wider sidewalks, better internal connections, and more public pathways, would promote multimodal use of the street network; and the least-steep streets would provide key bicycle connections to existing city bicycle networks. As discussed in Chapter 2, *Project Alternatives and Project Description*, several new transit stops are proposed within the Project site on the reconfigured street system.

These comments also raise concerns regarding potential increase in pollution as a result of Project implementation. The increase in traffic on roadways will result in an increase in pollution and health risks at existing residences in the Project vicinity. However, the impacts associated with operation of the Project were found to be less than significant. After construction is completed, as discussed in Section 5.9, *Air Quality*, of the Draft EIR/EIS there would be no exceedances of an air quality standard as a result of the Project that would worsen regional air quality. With regard to localized impacts, for existing residents, PM<sub>2.5</sub> concentrations would be above the City’s adopted threshold of 10 µg/m<sup>3</sup> without mitigation during construction, as shown in Table 5.9-8 on Page 5.9-35 of the Draft EIR/EIS. With implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-4, PM<sub>2.5</sub>,

concentrations would be below the City's threshold during the construction period (Table 5.9-11 on Page 5.9-38) and during buildout (Table 5.9-9 on Page 5.9-36). Cancer risk for existing residents would be above the USEPA's acceptable range of cancer risk without mitigation, as shown in Table 5.9-7 on Page 5.9-34. With mitigation, however, the cancer risk on existing residents would be within the USEPA's range, as shown in Table 5.9-10 on page 5.9-37.

Thus, while existing residents would be exposed to increased pollution and health risks as a result of the Project, it has been determined with widely-used and reputable thresholds that the increased risk to existing and new residents would not be significant.

#### Comment AQ-4: Article 38

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA

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"Roadway-generated pollutants: The DEIR/DEIS identifies the City of San Francisco's health code provisions regarding roadway-generated pollutants (Article 38) and concludes that based on the location of the project site outside of the Air Pollutant Exposure Zone Map, the project is not required to provide enhanced ventilation for the proposed residential units (p. 5.9-6). This determination was based on the Department of Public Health's March 2014 guidance document. The 2014 amendments to Article 38 included revisions to the underlying map of the City's Air Pollutant Exposure Zone and it is not clear if the air quality analysis utilized the most recent Air Pollutant Exposure Zone map. See: <https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Article38DevGuidance.pdf>.

*Recommendation:* Identify in the FEIR/FEIS whether the determination that the project does not need to provide enhanced ventilation still applies under the 2014 amendments to Article 38." (United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA])

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#### Response AQ-4

These comments raise concerns regarding the determination in the Draft EIR/EIS that the Project is not located in an Air Pollutant Exposure Zone. The determination that the Project is located outside of the Air Pollutant Exposure Zone Map was used using the April 10, 2014 Air Pollutant Exposure Zone map. Page 5.9-6 of the Draft EIR/EIS has been revised to indicate that the determination that the Project is not located in an air pollutant exposure zone is based on the 2014 version of the map.

Based on DPH's ~~latest guidance document (March 2014)~~ April 2014 Air Pollutant Exposure Zone Map for implementation of this ordinance, the Proposed Project would not be required to install an enhanced ventilation system capable of removing 80 percent of ambient outdoor PM2.5 concentrations from habitable areas of residential units.

### Comment AQ-5: Volatile Organic Compounds

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Reid

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"These mitigations are all helpful and necessary; however, while the document identifies off-gassing of architectural coatings as a primary emissions source (p. 639), it offers no details, quantification, or mitigation of this source. Volatile Organic Compound (VOC) off-gassing from building materials is known to be significantly detrimental to indoor air quality. Therefore, expected VOC levels in this project and their associated health risks should be quantified and reported, and the project applicant should specify the use of low-VOC paints, coatings, carpets, and other finish materials in the residences." (Daniel Reid, letter, December 21, 2014 [I-Reid])

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### Response AQ-5

These comments raise concerns regarding the potential use of materials containing VOCs in the Project and associated health risks. VOC off-gassing has been quantified for Project construction and operation. This source of pollutants is incorporated into the construction and operational reactive organic gases (ROG) emissions presented in Section 5.9, *Air Quality*, of the Draft EIR/EIS. ROG emissions would not exceed the BAAQMD threshold for any year, so architectural coatings would not contribute to a substantial worsening of regional air quality. There is no emissions threshold for indoor air quality specific to VOC off-gassing, but the BAAQMD does set limits for the VOC content of architectural coatings. For the Project, the analysis assumes that architectural coatings are in compliance with the BAAQMD limits. Architectural coating mitigation measures from the California Emissions Estimator Model (CalEEMod), the model used for this analysis, were incorporated into the emissions estimates. These measures include using low-VOC paints on residential and non-residential interior and exterior surfaces. As discussed in the greenhouse gas compliance checklist (Appendix 4.10A), the Project would comply with the requirement to use low-emitting paints and coatings, per the *San Francisco Building Code* (see Pages 20-21 of Appendix 4.10A of the Draft EIR/EIS).

Due to the complexity of the Project and the many sources of emissions involved, architectural coating emissions are not shown separately in the Draft EIR/EIS. However, emissions from this source and the assumptions used can be found in Appendix 4.9A.

### 3.10 GREENHOUSE GAS EMISSIONS

The comment and corresponding response in this section cover a topic in Chapters 4 and 5, Sections 4.10 and 5.10, *Greenhouse Gas Emissions*, of the Draft EIR/EIS. The topic is related to:

- GG-1: Operational Greenhouse Gas Emissions

#### Comment GG-1: Operational Greenhouse Gas Emissions

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Reid

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“This section reports a net increase in GHG emissions for the proposed project of 7,854 metric tons of CO<sub>2</sub> equivalent per year (MTCO<sub>2</sub>E) from a combination of additional vehicle trips, energy usage, waste generation, and other sources. This increase is well below the Clean Air Act’s reporting limit of 25,000 MTCO<sub>2</sub>E, and the listed project alternatives would each result in smaller increases or, in the case of the Housing Replacement alternative, a net decrease of 117 MTCO<sub>2</sub>E.

These levels are satisfactory in support of the document’s finding of “Less than Significant” GHG impacts with respect to CEQA and NEPA criteria. However, due to the serious and pressing threat of global climate change, there is always room for improvement. This document and others like it should include a full accounting of the data, estimates, and assumptions behind the cited figures. This information will enable the pursuit of further efficiency improvements and emissions reductions in building and site design, transportation strategy, waste management, and other domains.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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#### Response GG-1

These comments raise concerns regarding full reporting of data, estimates, and assumptions behind the cited figures in the GHG calculations. The CalEEMod tool was used to analyze GHG emissions associated with the Project. The assumptions that were input into the model are included in an Appendix to this document.

### 3.11 WIND AND SHADOW

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.11 and 5.11, *Wind and Shadow*, of the Draft EIR/EIS. These include topics related to:

- WS-1: Shadow Impacts on Public Property
- WS-2: Shadow Impacts on Private Property
- WS-3: Wind Impacts

#### Comment WS-1: Shadow Impacts on Public Property

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-O'Rourke

I-Robbins

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"5. The proposed buildings for the 23rd Street block between Arkansas and Connecticut are 6 storeys and this will cast shadows over the park across the street. I would urge that any buildings on this block be designed to preserve the natural light and views from this public park." (*Kevin O'Rourke, letter, January 6, 2015 [I-O'Rourke]*)

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"Section 2: Shadow - The height of the Proposed Project buildings on 23rd St. will cast shadow on 23rd St. and the Potrero Hill Rec Center, which will significantly impact pedestrians, residents, users of the park, and the community. The information in the EIR/EIS regarding public use of these areas (Section 5.11) was misleading. The Proposed Project directly contradicts the SF Planning Department Goals regarding shadow and should be amended to address these inconsistencies." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"SECTION II - Shadow on public areas: The Proposed Project plans to construct very tall buildings that tower above the current street level. The EIS/EIR report did not take into consideration the shadow that these buildings will cast on the footpath that surround the Rec Center, which is well-used, or the pedestrian thoroughfare of 23rd St. The specific sections of the EIS/EIR that deals with shadow is Section 5.11: *Wind and Shadow*, and specifically how the Proposed Project deals with Proposition K - The Sunlight Ordinance, which prohibits" any structure that would cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission." Under CEQA, the report concludes that "the Proposed Project would not result in new

shadows in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant).

The main misrepresentations in the EIS report are twofold: 1. that residents do not use the southern side of the Potrero Rec Center, and so the additional shadow cast by the taller building will not be significantly impactful; and 2. No mention of blocking the street sunlight of 23rd Street. The south end of the Rec Center is frequently used and is an important part of the open space at the heart of our community. Resident exercise there, both by running around the perimeter of the baseball field as well as around the foot path found exterior to the chain link fence. As a result of the inaccuracy in the report regarding use of the Rec Center, a revised report should conclude that due to the height of the building there will be a significant impact on the shadow on our public space.

In addition, the report fails to take into account the significant and detrimental effect that the shadow from the tall buildings south of 23rd St. will have on the pedestrians using that street. As mentioned above, the views from street level on 23rd St. are exceptional, and pedestrians frequently use the south side to enjoy them, and also to congregate. The shadows will impact this public street/open place and make the street less friendly for pedestrian passage. This is directly in opposition to the goal of the SF Planning Department listed below.

General Plan: POLICY 3.1.3 "Relate the prevailing heights of buildings to street and alley width throughout the plan area ... A core goal of the height districts is to create an urban form that will be intimate for the pedestrian"; POLICY 4.6.1- "Use established street design standards and guidelines to make the pedestrian environment safer and more comfortable for walk trips.";

Nor is the Proposed Project as currently configured in line with SF planning's stated Rec and Open Space Plan (see <http://www.sf-planning.org/ftp/General Plan/13 Rec and Open Space.htm>): POLICY 2.3 -"Preserve sunlight in public open spaces."

Finally, the proposed Project goes against SF Planning's general plan for urban design (<http://www.sfplanning.org/ftp/General Plan/IS Urban Design.htm>), which includes OBJECTIVE 3: "Plazas or parks located in the shadows cast by large buildings are unpleasant for the user."

Of note, the comments above focused on the Rec Center and 23rd St. will likely not be applicable if people stop using these areas due to the obstruction of the views. Accordingly, the Shadow assessment and the View assessment should be assessed together as they both relate to proposed building height. Both shadow and view are significantly impacted by the height of the proposed buildings J-M as they tower above the current buildings. The Development as currently designed will impact Views/Aesthetics and Shadows, and as mentioned above will sacrifice public open spaces for private profit and views from private apartments.

It is the responsibility of the city and the developers to maintain our public spaces. Accordingly, I would implore Hope SF and Bridge Housing to reconsider the heights of these buildings J-M in order



to preserve sunlight and views and avoid the significant impact that these buildings will have on the Shadow cast on our public spaces.

In order to adequately address these impacts, I propose three options that all keep buildings J-L (and possibly M) no more than 10–15 feet above street level and therefore preserve the views:

1. Build shorter buildings at J-M. This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
2. Build shorter building at J-M but build taller buildings further down the hill (e.g., Building A-H and X). This will allow the same degree of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at '65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents and future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco.
3. Build the same height buildings but start at a lower height (do not terraform the land and add fill to bring up the height of the south side of 23rd St.). This will also not impact views from 23rd St. or the Potrero Hill Rec Center open spaces." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"b. I am very concerned that casting shadows on and blocking views from 23rd St. and the Potrero Hill rec center directly go against this. In addition, this can be mitigated so simply by building taller buildings further down away from the tallest part of the hill." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Summary: In summary, the EIR/EIS report failed to adequately address the impact of the Proposed Project views/aesthetics, shadow, community integration and general congestion.

While I welcome Rebuild Potrero's plan to redevelop the south side of Potrero Hill. Importantly, I believe that this project can meet the city's housing needs and also responsibly attend to the preservation of the neighborhood and quality of life of the existing residents. However, the current Proposed Project fails to adequately preserve public open space and views and the EIR/EIS failed in its stated mission to accurately assess this impact. Accordingly, I believe that the Hope SF must redesign the Proposed Plan with a more neighborhood-friendly design that focuses on preserving the open space and views that form the heart and soul of San Francisco and Potrero Hill in particular. It is the

responsibility of both the developers and the governmental regulatory agencies to ensure that private profit does not supersede public interests.” (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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Response WS-1

These comments raise concerns regarding wind and shadow on the Potrero Hill Recreation Center, including the footpath around the edges of the Recreation Center and on 23<sup>rd</sup> Street between Arkansas and Connecticut Streets. Please refer to Response AE-2 and AE-3 in this chapter for discussion of visual impacts on 23<sup>rd</sup> Street. For a discussion regarding the three options suggested by the commenter, refer to Responses PD-1, AE-2, and AE-3.

With respect to the footpath that surrounds the Potrero Hill Recreation Center, refer to pages 5.11-6 to 5.11-13 in Section 5.11, *Wind and Shadow*, of the Draft EIR/EIS for a discussion of the shadow impact on this area. Shadow impacts to the footpath along the northeastern edge of the park are disclosed in detail in the Draft EIR/EIS. The commenter states that shadow impacts to the southern edge of the park were not discussed in detail. As a result, the following text has been added to Impact WS-2 on page 5.11-6 of the Draft EIR/EIS:

The Proposed Project buildings would cast shadows on the walking paths on the southern edge of the Potrero Hill Recreation Center at sunrise on December 20<sup>th</sup> (Figure 5.11-7). The shadows would recede but continue to cast a minimal shadow until 10:00 AM on December 20<sup>th</sup> (Figure 5.11-5). As shown in Figure 5.11-6, Proposed Project buildings would also cast net new shadow on the walking paths on the southwestern edge of the Potrero Hill Recreation Center from approximately 3:00 PM until sunset on December 20<sup>th</sup>. The Proposed Project would cast shadows along the southwestern edge of the park during the spring and summer from one hour after sunrise but would recede by 9:00 AM.

However, as discussed in Section 5.11, the 1989 Memorandum regarding “Proposition K – The Sunlight Ordinance” outlines the qualitative and quantitative methods for determining the significance of newly created shadows. Parks greater than 2 acres, such as the Potrero Hill Recreation Center, are considered larger parks. Under the 1989 Memorandum, for larger parks that are shadowed less than 20 percent of the time during the year, an additional 1.0 percent of shadow is recommended as permitted if the specific shadow meets the additional qualitative criteria. The Proposed Project would add 0.911 percent new shadow and, therefore, the potential impacts of the increased shadow including on the walking paths along the southern edge of the Recreation Center are less than significant based on the

quantitative criteria<sup>8</sup> The results of this analysis are unambiguous and the Proposed Project complies with existing shadow regulations.

With respect to the shadow on 23<sup>rd</sup> Street, as stated by one commenter Proposition K - The Sunlight Ordinance, which prohibits “any structure that would cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission,” 23<sup>rd</sup> Street is not a property under the jurisdiction of the Recreation and Park Commission but instead the San Francisco Department of Public Works (DPW). The creation of a shadow along 23<sup>rd</sup> Street would not violate Proposition K. Nevertheless, the Draft EIR/EIS discloses shadow impacts to 23<sup>rd</sup> Street in the context of whether the shadow would substantially affect public areas. As discussed in the Draft EIR/EIS, the Proposed Project would cast a shadow on the buildings on 23<sup>rd</sup> Street from Rhode Island Street to Wisconsin Street at sunrise on September/March 20<sup>th</sup> (Figure 5.11-1). However, as shown in Figure 5.11-2, the shadow would recede only to buildings on 23<sup>rd</sup> Street and Wisconsin Street by 9:00 AM on September/March 20<sup>th</sup>.<sup>9</sup> The range of times for the first hour after sunrise is 6:46 AM (occurs on June 21<sup>st</sup>) to 8:03 AM (occurs on March 15<sup>th</sup>/September 27<sup>th</sup>) and the range of times when the shadow is gone from the park is 8:30 AM (occurs on June 21<sup>st</sup>) (Figure 5.11-3) to 9:45 AM (occurs on March 15<sup>th</sup>/September 27<sup>th</sup>). The Proposed Project would not cast a shadow on the buildings on 23<sup>rd</sup> Street by 10:00 AM on June 21<sup>st</sup> (Figure 5.11-3). The Proposed Project would cast a shadow on the buildings on 23<sup>rd</sup> Street at sunrise on December 20<sup>th</sup> (Figure 5.11-4). However, as shown in Figure 5.11-5 of the Draft EIR/EIS, this shadow would be gone by 10:00 AM on December 20<sup>th</sup> (worst shadow day), Figure 5.11-6 shows a small shadow at 3:00 PM on the buildings on 23<sup>rd</sup> Street from November 15<sup>th</sup> to January 25<sup>th</sup>. As shown in the figures of the Draft EIR/EIS, the Proposed Project would cast minimal shadow on the buildings on 23<sup>rd</sup> Street but only for a short period of the day and year. Based on the shadow analysis,<sup>10</sup> the potential for shadows on 23<sup>rd</sup> Street and the Potrero Hill Recreation Center have been adequately addressed.

## Comment WS-2: Shadow Impacts on Private Property

This response addresses a comment from the commenter listed below; each comment on this topic is quoted in full below this list:

I-Lee H

I-O'Rourke

<sup>8</sup> CADP. Shadow Calculations and Diagrams, February 2014. The shadow calculations are available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of the Case File No. 2010.0515E.

<sup>9</sup> Shadows on September 21st are analogous to shadows on March 21st.

<sup>10</sup> CADP. Shadow Calculations and Diagrams, February 2014. The shadow calculations are available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of the Case File No. 2010.0515E.

“4. If the development is allowed to proceed as planned, the 4 storey building to be built across the street from my building will be too high compared to the existing buildings on the North side of the street. I am concerned about losing natural light in my home.” (Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke])

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“This will create a negative impact on the buildings directly across the street from the project. For those buildings currently on 23rd Street, the proposed buildings would block their entire view, deprive them of the direct heat generated from the sun, will have a negative visual impact on the community at large, and will bring more traffic than the narrow road was meant to handle.

We hope the proposed buildings on 23rd Street can either be removed from the master plan or relocated to an area that is less obtrusive. This will also help to minimize the visual footprint of this large-scale project.” (Homer Lee, letter, January 4, 2015 [I-Lee H])

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Response WS-2

These comments raise concerns regarding shadow on private property.

Please refer to Responses AE-2 and AE-3 for a discussion of the visual effects to buildings on 23<sup>rd</sup> Street.

As discussed in Section 5.11, *Wind and Shadow*, of the Draft EIR/EIS, Proposition K only applies to property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission. Shadows on private property are not regulated by this proposition. The Draft EIR/EIS also analyzes whether the Proposed Project would create new shadow in a manner that substantially affects other public areas. The document does not evaluate potential effects to private property.

Nevertheless, the evidence in the Draft EIR/EIS suggests that impacts to private residences would be minimal. As shown in Figure 5.11-1, the Proposed Project would cast a shadow on the buildings on 23<sup>rd</sup> Street from Rhode Island Street to Wisconsin Street at sunrise on September/March 20<sup>th</sup>. However, as shown in Figure 5.11-2, the shadow would recede to only buildings on 23<sup>rd</sup> Street and Wisconsin Street by 9:00 AM on September/March 20<sup>th</sup>. As shown in Figure 5.11-3, the Proposed Project would not cast a shadow on the buildings on 23<sup>rd</sup> Street by 10:00 AM on June 21<sup>st</sup>. The range of times for the first hour after sunrise is 6:46 AM (occurs on June 21<sup>st</sup>) to 8:03 AM (occurs on March 15<sup>th</sup>/September 27<sup>th</sup>) and the range of times when the shadow is gone from the park is 8:30 AM (occurs on June 21<sup>st</sup>) (Figure 5.11-3) to 9:45 AM (occurs on March 15<sup>th</sup>/September 27<sup>th</sup>). As shown on Figure 5.11-4, the Proposed Project would cast a shadow on the buildings on 23<sup>rd</sup> Street at sunrise on December 20<sup>th</sup>. However, as shown in Figure 5.11-5 of the Draft EIR/EIS, the shadow would be gone by 10:00 AM on December 20<sup>th</sup>, and Figure 5.11-6 shows a small shadow at 3:00 PM on the buildings on 23<sup>rd</sup> Street. As

shown in the figures of the Draft EIR/EIS, the Proposed Project would cast minimal shadow on the buildings on 23<sup>rd</sup> Street but only for a short period of the day and year. Based on the shadow analysis,<sup>11</sup> the potential for shadow impacts have been adequately addressed.

### Comment WS-3: Wind Impacts

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Hunting

I-Montalto (2)

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“I think 10 years is a very long time to ask neighbors to be patient with a reconstruction project. I would appreciate very much if there could be some kind of a compromise struck with that proposal as well. I would like to see less time in construction.

On 25th Street, where I live, the wind blows from west to east, generally. It brings all the trash and garbage over the hill and onto our street. I would also appreciate that that be taken into consideration and perhaps you could put some kind of a plan in place to help keep our part of the neighborhood clean during the construction process.” (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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“Secondly, the mitigation, a 10-year project, we’re in the wind path of anything that goes on up there. The wind, almost every day, blows from west to east. So I would like to see that addressed so that the people that live there -- there’s quite a few people that live south and east of this project, and I’m just a little concerned about that. Ten years seems like a long time for a project to take place. Thank you very much.” (*Dennis Montalto, Public Hearing, December 11, 2014 [I-Montalto (2)]*)

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### Response WS-3

This comment raises concerns regarding wind conditions in the Project area. As discussed in Section 5.11, *Wind and Shadow*, of the Draft EIR/EIS, the Project is not anticipated to alter wind conditions in the Project area. Although wind conditions under existing conditions are unfavorable, the Project would not worsen the conditions. The Proposed Project is not so substantially greater in height that it would result in adverse effects on ground-level winds. Regarding wind debris that might be present

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<sup>11</sup> CADP. Shadow Calculations and Diagrams, February 2014. The shadow calculations are available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of the Case File No. 2010.0515E.

outside the Project site during the construction period, Improvement Measure IM-AE-2a requires several provisions to keep the Project area and its surroundings free of debris during construction.

### 3.12 RECREATION

The comment and corresponding response in this section cover topics in Chapters 4 and 5, Sections 4.12 and 5.12, *Recreation*, of the Draft EIR/EIS. The topic is related to:

- RE-1: Preserve Recreational and Open Space Areas

#### Comment RE-1: Preserve Recreational and Open Space Areas

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)

I-Abel (2)

I-Robbins

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"I am also concerned about the lack of open space in the plan, yet see how they mention the Starr King Open Space as bordering on the project. In reading between the lines, it seems they expect the current open space to support a massive influx of people. This is all good and fine as a marketing device to get market rate folks to buy or rent, but the Starr King Open Space does not get government funding and is in desperate need of money to repay for the sidewalks being fixed. Might the City or the builders consider donating to the SKOS so that it can remain a community space? As I understand it, if the Board does not come up with the money to repay the city for fixing the sidewalks that border it, the city could take back the open space, could even build on it. We NEED our open space and we need funding help so that it is accessible to all who currently live on the Hill, as well as to all those who will be moving in soon. I can provide you with more information on this." (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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"Mostly concerned about the open space. And specifically on the maps I've seen Starr King open space, which is on the other side of Starr King school. They're showing how, "Well, I that's just right across the street from the new rebuild. Won't that be great?" Yeah, that will be great. It's a wonderful open space. But it can't be the major open space of the project. There's only 2.5 acres of open space in the project and the Starr King is larger than that.

They need funding to fix the sidewalks. They need some help. That's going to be the space that people are gonna go into. And perhaps they could take that into consideration and help out with Starr King open space. Thank you very much." (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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“Section IV-Inattention to community integration, open spaces, and responsible development. Planning Department: Section 3.1 of the Hope SF Master Plan EIR/EIS claims that the Proposed Project is consistent with the SF Planning Department’s General Plan for Potrero Hill/Showplace Square ([http:// www.sf-planning.org/ftp/Gneral\\_Plan/Showplace\\_Square\\_Potrero.htm](http://www.sf-planning.org/ftp/Gneral_Plan/Showplace_Square_Potrero.htm)). However, on reviewing the plan, it is clear that the Proposed Project is at odds with numerous core tenants of the SF Planning Department’s plans, including:

- I. POLICY 3.1.2 - Development should respect the natural topography of Potrero Hill.
- II. POLICY 5.2.4 - Encourage publicly accessible open space as part of new residential and commercial development.
- III. POLICY 7.1.1 - Support the siting of new facilities to meet the needs of a growing community and to provide opportunities for residents of all age levels.

Nor is the Proposed Project as currently configured in line with SF planning’s stated Rec and Open Space Plan (see [http://www.sf-planning.org/ftp/General\\_Plan/13\\_Rec\\_and\\_Open\\_Space.htm](http://www.sf-planning.org/ftp/General_Plan/13_Rec_and_Open_Space.htm)):

- IV. POLICY 1.1 - Protect the natural character of regional open spaces and place high priority on acquiring open spaces noted for unique natural qualities.
- V. POLICY 2.2 - Preserve existing public open space - this includes a stipulation that “When public land becomes surplus to one public use, the General Plan states that it should be reexamined to determine what other uses would best serve public needs. The General Plan gives priority to direct public uses that meet either immediate or long-term public needs. One of these uses is open space.”
- VI. POLICY 2.3 - Preserve sunlight in public open spaces
- VII. POLICY 4.4 - Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.” (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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“d. The developments adds a community and senior center but neglects to include and space for athletic activities such as a gym, pool, basketball court, or other. They plan on building the cheapest facilities possible to meet the requirements for public use space. This development should add to the community athletic facilities. They plan to add 1,100 units to the existing Potrero Hill Rec Center usage without any additional athletic infrastructure. Furthermore, they plan to detract from the current existing infrastructure by obstructing the view and casting shadows on the baseball field.

If they plan for their residents to use the existing Rec Center facilities, they should at least preserve the current open spaces and decrease the height of the buildings bordering the Rec Center. I would ask they support this Policy by adding facilities such as basketball or volleyball courts to the current development plan, possibly in the existing public land zoned P marked X, and certainly not detract from the wonderful and historic public use facility that is currently there." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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#### Response RE-1

These comments raise concerns regarding existing open space and impacts the Proposed Project would have on open space. As discussed in Section 5.15, *Recreation*, although the Proposed Project would increase the use of existing neighborhood and regional parks or other recreational facilities, it would not increase use to the extent that substantial physical deterioration of the facilities would occur or be accelerated. The Proposed Project and alternatives would be consistent with the applicable objectives and policies of the General Plan and Recreation and Open Space Element because it would not result in the loss of existing public open space. The Proposed Project and Alternative 1 would provide open space for the residential units and privately owned publicly accessible open space.

As stated in Section 4.12, *Recreation*, of the Draft EIR/EIS, property in San Francisco that is permanently dedicated to publicly-accessible park and recreational uses totals approximately 4,090 acres, or 5.08 acres per 1,000 San Francisco residents. With a total population in the City and County of San Francisco of 805,235 as of the 2010 Census, the new population growth of 2,596 persons<sup>12</sup> as a result of the Proposed Project would decrease this ratio slightly to approximately 5.06 acres per 1,000 residents. This increase in population would likely generate an increased demand in park use; however, such demand would not be considered substantial given the availability of nearby parks and recreational facilities and given that this density would be offset by the 7.12 acres of both public and private open space opportunities that would be provided onsite. It is likely that residents of the Proposed Project would also utilize the neighboring Potrero Hill Recreation Center, Jackson Playground, and McKinley Square Park. Given the proximity, it is anticipated that residents of the Proposed Project would utilize these nearby resources in addition to those provided onsite.

Of the 7.12 proposed acres of open space, 3.62 acres would be publically-accessible to the greater Potrero Hill neighborhood. As shown in Figure 5.12-1, the parks would include the 24<sup>th</sup> Street Park, Connecticut Park Terrace, Squiggle Park, 25<sup>th</sup> and Connecticut Mini Park, Getaway Open Space, 23<sup>rd</sup> Street Stair, and Texas Street Overlook/Edible Garden. These spaces would include planted areas, stairs and terraces, a playground and tot lot, community gardens, view point areas, grass play areas, and barbeque and picnic facilities. As appropriate, the facilities would be ADA accessible via a ramp

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<sup>12</sup> 1,700 units under the Proposed Project × 2.28 persons per household = 3,876 residents. Therefore, the net increase (3,876 future residents – 1,280 existing residents) in Project site population would be approximately 2,596.



from Wisconsin Street to Arkansas Street, along 24<sup>th</sup> Street. The 24<sup>th</sup> Street Park would be designed as a flexible public open space with shared uses. This park would include a series of landscaped stairs and flat lawn terraces with seating and would be designed to accommodate the sloping topography and connect 24<sup>th</sup> and 24 and ½ Streets. The remaining 3.5 acres would be private open space that would be included as part of the residential buildings through features such as internal courtyards, and/or balconies. The residential buildings would provide a minimum of 80 sf of usable open space per residential unit as required under *Planning Code* Section 135.

As discussed in Impact RE-1 in Section 5.12, the Proposed Project does not currently include additional athletic facilities. It is likely that residents of the Proposed Project would also use the Potrero Hill Recreation Center, adjacent to the Project site to the north and west. The Potrero Hill Recreation Center serves both local and citywide populations. The indoor recreational center includes basketball courts that are used by leagues and for pick-up games as well as programmed exercise classes for all ages, a community auditorium, and a computer room. The Potrero Hill Recreation Center also has outdoor baseball fields used for practice by leagues citywide, a children's playground, passive recreational areas with paths frequently used for dog walking, and community-serving tennis courts. To the extent that new residents at the Project site or their children, join leagues that practice at the Potrero Hill Recreation Center, the use of these facilities may be somewhat increased. However, the proximity of the Project site to the Potrero Hill Recreation Center would not necessarily result in an increased enrollment in organized athletics. Additionally, some uses, such as the community auditorium, computer room, senior center, playground, and passive recreation activities offered at the Potrero Hill Recreation Center would be supplemented/duplicated on the Project site. As such, because the increased use of recreational facilities is expected to be spread out among several parks in the area, including the recreational facilities included as part of the Proposed Project, it is not anticipated that the Proposed Project would contribute to the substantial physical deterioration of existing neighborhood parks and recreational facilities.

Any funding or donations to open space areas outside the Project site is beyond the scope of this Draft EIR/EIS, particularly since the Draft EIR/EIS determined that the Project does not have an environmental impact on off-site open spaces.

### 3.13 UTILITIES AND SERVICE SYSTEMS

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.13 and 5.13, *Utilities and Service Systems*, of the Draft EIR/EIS. These include topics related to:

- UT-1: Water Supply
- UT-2: Stormwater Regulations
- UT-3: Wastewater
- UT-4: Construction Water Use
- UT-5: Project Water Use and Demand

- UT-6: Project Water Distribution System
- UT-7: Use of Wells
- UT-8: Solid Waste Services

### Comment UT-1: Water Supply

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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“Chapter 4 Comments. Page 4.13-1, Paragraph 3: Some of the numbers from the Urban Water Management Plan (UWMP) are outdated and will be updated in the 2015 UWMP. Some of the updated numbers are already reflected in SFPUC’s communications and reports. Instead of 2.5 million customers, the SFPUC currently serves 2.6 million. Instead of 280 miles of pipelines and 60 miles of tunnels in the Regional Water System, the SFPUC currently operates 390 and 74 miles, respectively. Instead of 17 pump stations in the City, there are currently 22. Instead of 12 reservoirs in the City, there are currently 11. Instead of 1,250 miles of pipelines in the City, there are currently 1,235. Instead of nine storage tanks in the City, there are currently eight.

Page 4.13-3, Table 4.13-1: It is recommended that water demand projections in Table 4.13-1 be based on the SFPUC’s latest projections, which are documented in the 2013 Water Availability Study and supersede the projections in the 2010 UWMP. The Water Supply Assessment that SFPUC prepared for the project takes into account the projections in the 2013 Water Availability Study.

4.13-3, Table 4.13-2: It is recommended that water supply projections in Table 4.13-2 be based on the SFPUC’s latest projections, which are documented in the 2013 Water Availability Study and supersede the projections in the 2010 UWMP. The Water Supply Assessment that SFPUC prepared for the project takes into account the projections in the 2013 Water Availability Study.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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“Page 5.13-1, Paragraph 3: Regarding the first sentence, “According to the 2010 San Francisco Urban Water Management Plan (UWMP), [ ... ]nearly 2.5 million people rely on water supplied by the SFPUC water system ... “, the SFPUC currently identifies 2.6 million.

Page 5.13-3, Paragraph 1: Please note that the deadline for submittal of the 2015 UWMP to the California Department of Water Resources has been postponed from December 31, 2015 to July 1, 2016.

Page 5.13-3, Paragraph 2: The subsection heading includes “Senate Bill 221,” but there is no description of SB 221 in the paragraph.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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“Page 5.13-14, Paragraph 1: Regarding the sentence: “Therefore, the Proposed Project is required to prepare a WSA that documents the SFPUC’s current and projected water supplies when compared to demands associated with the LUA 2012 projections.” it can also be noted that the water demands associated with the LUA 2012 projections are provided in the 2013 Water Availability Study that was prepared by the SFPUC in May 2013 and available at: <http://sfwater.org/modules/showdocument.aspx?documentid=4168>.

Regarding footnote 9, it is not correct to associate the letter from Paula Kehoe to Bill Wycko (dated July 6, 2011) with the sentence that describes the Planning Department’s confirmation of population growth in the LUA 2012. Footnote 9 would be better associated with the next sentence that begins with: “The Proposed Project would not result in major expansion of the water supply system ... “ Or, the more appropriate letter to reference is that from Scott Edmonson to SF Planning EP Planners and SFPUC Planners dated June 13, 2013. Scott Edmonson’s letter can still be found in Appendix 4.13 (see Attachment B of the Water Supply Assessment).” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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Response UT-1

These comments raise concerns regarding water supply data. Based on comments received, information about SFPUC on page 4.13-1 has been revised to reflect updated numbers included in the 2015 San Francisco Urban Water Management Plan (UWMP).

According to the 2010 San Francisco Urban Water Management Plan (UWMP), which was adopted by the San Francisco Public Utilities Commission (SFPUC) on June 14, 2011, nearly 2.56 million people rely on water supplied by the SFPUC water system to meet their daily water needs, including wholesale customers in the Peninsula, South Bay, and Easy Bay communities. San Francisco customers, or “in-City” customers, include those within the City and County of San Francisco. The Regional Water System (RWS) consists of over 280 390 miles of pipeline, over 60 74 miles of tunnels, 11 reservoirs, five pump stations, and two water treatment plants located outside the city (the RWS) and over 1,250 1,235 miles of pipeline, 12 11 reservoirs, nine eight storage tanks, and 17 22 pump stations located within the city limits. Water supplies to the in-city distribution system from the RWS are currently limited to an average annual supply of 265 million gallons per day (mgd). The SFPUC provides water to both retail (residents, businesses, and industries within the corporate boundaries of the city) and wholesale customers. The RWS draws approximately 85 percent of its water from the Upper Tuolumne

River Watershed. Water is collected in the Hetch Hetchy Reservoir in Yosemite National Park, fed into an aqueduct system, and then conveyed water 167 miles by gravity, and ultimately delivered to Bay Area reservoirs and customers. The remaining water supply (approximately 15 percent) is drawn from local surface waters in the Alameda and Peninsula.

The contents of table 4.13-1 on page 4.13-3 have been deleted and replaced to reflect latest SFPUC water supply projections found in the 2013 Water Availability Study for the City and County of San Francisco.

<b>Table 4.13-1 SFPUC Retail Water Demand (mgd)</b>							
<b>Users, Facilities, and Entities</b>	<b>Projected Water Demand</b>						
	<b>2005<sup>a</sup></b>	<b>2010<sup>a</sup></b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
<b>In-City Customers</b>							
Single-Family Residential <sup>b</sup>	18.4	16.4	17.9	17.1	16.5	16.0	15.8
Multi-Family Residential <sup>b</sup>	27.7	25.1	28.9	28.4	28.2	28.3	28.6
Non-Residential <sup>b</sup>	24.8	23.5	25.6	26.5	27.5	28.7	29.9
Other In-city Demands <sup>b,c</sup>	0.2	0.1	0.2	0.2	0.2	0.2	0.2
Losses <sup>d</sup>	8.2	6.3	5.0	4.9	5.0	5.0	5.1
<i>In-city Subtotal<sup>b</sup></i>	<i>79.3</i>	<i>71.4</i>	<i>77.7</i>	<i>77.1</i>	<i>77.3</i>	<i>78.2</i>	<i>79.7</i>
<i>In-city Subtotal w/Conservation<sup>f</sup></i>	<i>79.3</i>	<i>71.4</i>	<i>73.6</i>	<i>71.7</i>	<i>71.2</i>	<i>72.1</i>	<i>73.7</i>
<b>Suburban Retail Customers<sup>g</sup></b>							
Other Retail Customers <sup>b</sup>	4.4	3.0	3.8	3.8	3.8	3.8	3.8
Lawrence Livermore Lab	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Groveland CSD	0.4	0.7	0.8	0.8	0.8	0.8	0.8
<i>Suburban Retail Subtotal</i>	<i>5.2</i>	<i>4.1</i>	<i>5.0</i>	<i>5.0</i>	<i>5.0</i>	<i>5.0</i>	<i>5.0</i>
<b>Groundwater Customers</b>							
City Irrigation Demand <sup>i</sup>	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Castlewood Community Demand <sup>j</sup>	0.7	0.7	0.7	0.7	0.7	0.7	0.7
<i>Groundwater Subtotal</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>
<i>Total Retail Demand<sup>k</sup></i>	<i>86.7</i>	<i>77.7</i>	<i>80.7</i>	<i>78.9</i>	<i>78.5</i>	<i>79.2</i>	<i>80.9</i>

**SOURCE:** San Francisco Public Utilities Commission. 2011. 2010 Urban Water Management Plan for the City and County of San Francisco. Table 12, p. 36.

a. 2005 and 2010 data are based on actual billing data (SFPUC, 2010). 2015–2035 are projections from the SFPUC Retail Demand Model Update and Calibration Technical Memorandum (April 2011).

b. 2005 and 2010 data are based on actual billing data (SFPUC, 2010). 2015–2035 are projections from the SFPUC Retail Demand Model Update and Calibration Technical Memorandum (April 2011).

c. Builders and Contractors, Docks & Shipping.

d. Losses reported for 2005 and 2010 include meter under registration. Losses in 2015–2035 exclude meter under registration because they are included in the retail demand projections for residential and non-residential sectors. Meter under registration losses estimated at 2.2% of residential and 2.1% of non-residential sector demands. System losses excluding meter under registration estimated at 6.86% of sector demand.

e. “In-City subtotal” refers to demand that includes code-driven savings from changes in state and federal plumbing codes and regulations.

f. “In-City Subtotal with Conservation” refers to demand that includes code-driven savings plus savings from SFPUC-initiated conservation programs.

g. Suburban retail customer future demands do not include active conservation savings. The SFPUC plans on working with the suburban Retail Customers on conservation activities, but has not yet quantified the savings. Accordingly, demands are kept constant through 2035, but will be adjusted as more information becomes available.

h. The San Francisco County Jail, San Francisco International Airport, and other suburban or municipal accounts.

i. Irrigation at Golden Gate Park, the Great Highway median, and the San Francisco Zoo.

j. 100% of Castlewood demand (0.4 mgd) is met by groundwater wells in Pleasanton and 75% of Sunol Golf course demand (0.3 mgd) met by subsurface diversions of surface water at the Sunol Filter Galleries. Projected demands are based on average use from 2000–2010 and remain unchanged over the 25-year planning horizon.

k. This refers to the sum of “in-City subtotal with conservation”, suburban retail subtotal, and groundwater subtotal.

**Table 4.13-1 SFPUC Retail Water Demand (mgd)**

<u>Users, Facilities, and Entities</u>	<u>Projected Water Demand</u>					
	<u>2012<sup>a</sup></u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
<u>In-City Customers</u>						
<u>Single-Family Residential<sup>b</sup></u>	<u>16.1</u>	<u>17.9</u>	<u>16.7</u>	<u>15.5</u>	<u>14.8</u>	<u>14.4</u>
<u>Multi-Family Residential<sup>b</sup></u>	<u>24.9</u>	<u>28.9</u>	<u>28.1</u>	<u>27.7</u>	<u>27.6</u>	<u>27.9</u>
<u>Non-Residential<sup>b</sup></u>	<u>23.2</u>	<u>25.6</u>	<u>26.5</u>	<u>27.7</u>	<u>27.5</u>	<u>27.7</u>
<u>Other In-city Demands<sup>d,g</sup></u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>
<u>In-City Irrigation Uses</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>
<u>Losses<sup>b,c</sup></u>	<u>6.9</u>	<u>5.0</u>	<u>5.1</u>	<u>5.2</u>	<u>5.2</u>	<u>5.2</u>
<u>In-city Subtotal<sup>e</sup></u>	<u>72.8</u>	<u>77.7</u>	<u>78.1</u>	<u>77.8</u>	<u>76.8</u>	<u>76.9</u>
<u>Suburban Retail Customers</u>						
<u>Single-Family Residential<sup>e</sup></u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>
<u>Non-Residential<sup>e</sup></u>	<u>3.7</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>
<u>Hetch Hetchy Water and Power Customers<sup>f,g</sup></u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>
<u>Suburban Retail Subtotal</u>	<u>5.0</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>
<u>Total Retail Demand<sup>k</sup></u>	<u>77.8</u>	<u>83.7</u>	<u>83.4</u>	<u>82.4</u>	<u>82.5</u>	<u>84.2</u>

SOURCE: San Francisco Public Utilities Commission, 2013, 2013 Water Availability Study for the City and County of San Francisco May, Table 6, p. 17.

- a. 2012 data are based on actual billing data.
- b. 2015-2035 projections were generated using the SFPUC Retail Demand Model and include savings from passive and active conservation.
- c. Losses reported for 2012 include meter under-registration. Losses for 2015-2035 exclude meter under registration because they are included in the retail demand projections for residential and non-residential sectors. Meter under-registration losses are estimated at 2.2% of residential and 2.1% of non-residential sector demands. System losses excluding meter under-registration are estimated at 6.86% of sector demand.
- d. Builders and Contractors, Docks and Ships.
- e. Irrigation at Golden Gate Park, the Great Highway, and the San Francisco Zoo.
- f. Hetch Hetchy Water & Power Customers include Lawrence Livermore National Laboratory, Groveland Community Services District and other incidental uses.
- g. 2015-2035 projections are based on average historic consumption, which has remained relatively constant over the past 20 years.

The contents of Table 4.13-2 on page 4.13-4 have been deleted and replaced to reflect latest SFPUC water supply projections found in the 2013 Water Availability Study for the City and County of San Francisco.

**Table 4.13-2 SFPUC Retail Water Supply**

<b>Current and Future Water Supply Sources</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
RWS Watersheds—Retail Supply <sup>a</sup>	81.0	81.0	81.0 <sup>a</sup>	81.0 <sup>a</sup>	81.0 <sup>a</sup>	81.0 <sup>a</sup>
Groundwater Sources: <sup>b</sup>						
■ Groundwater (In-city Irrigation Purposes)	1.5	1.5	0.3	0.3	0.3	0.3
■ Groundwater at Castlewood	0.7	0.7	0.7	0.7	0.7	0.7
■ Groundwater: Treated for Potable—Previously used for In-city Irrigation Purposes	0.0	0.0	1.2	1.2	1.2	1.2
<i>Groundwater Subtotal</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>
<i>Current Water Supply Subtotal</i>	<i>83.2</i>	<i>83.2</i>	<i>83.2</i>	<i>83.2</i>	<i>83.2</i>	<i>83.2</i>
Future Water Supply Sources:						
■ Groundwater: Potable from North Westside Groundwater Basin	0.0	2.8	2.8	2.8	2.8	2.8
■ Recycled Water	0.0	0.3	4.0	4.0	4.0	4.0
<i>Future Supply Subtotal</i>	<i>0.0</i>	<i>3.41</i>	<i>6.8</i>	<i>6.8</i>	<i>6.8</i>	<i>6.8</i>
<i>Total Supply</i>	<i>83.2</i>	<i>86.3</i>	<i>90.0</i>	<i>90.0</i>	<i>90.0</i>	<i>90.0</i>

SOURCE: San Francisco Public Utilities Commission. 2011. *2010 Urban Water Management Plan for the City and County of San Francisco* June. Table 41, p. 30.

a. Assumes 2018 supply limitation extends to 2035.

b. Groundwater currently serves irrigation to Golden Gate Park, the San Francisco Zoo, and the Great Highway median. A groundwater reserve of 0.3 mgd for irrigation purposes will remain as part of the SFPUC's non-potable groundwater supply (SFPUC 2008 Phased WSIP Variant). Castlewood and Sunol projected supplies remain unchanged over the 20-year planning horizon.

**Table 4.13-2 SFPUC Retail Water Supply**

<b>Current and Future Water Supply Sources</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
<u>Existing Supply Sources</u>					
<u>RWS Watersheds—Retail Allocation</u>	<u>81.0</u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>
<u>Suburban Groundwater and Subsurface Diversions:<sup>a</sup></u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>
<u>North Westside Groundwater Basin<sup>b</sup></u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>
<u>Recycled Water – Harding Park and Sharp Park</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>
<i>Existing Supplies Subtotal</i>	<i>83.5</i>	<i>83.5</i>	<i>83.5</i>	<i>83.5</i>	<i>83.5</i>
<u>Future Water Supply Sources:<sup>c</sup></u>					
<u>Future North Westside Groundwater Basin Expansion<sup>b</sup></u>	<u>0.0</u>	<u>2.8</u>	<u>2.8</u>	<u>2.8</u>	<u>2.8</u>
<u>Future Recycled Water Projects</u>	<u>0.0</u>	<u>2.0</u>	<u>4.0</u>	<u>4.0</u>	<u>4.0</u>
<i>Future Supply Subtotal</i>	<i>0.0</i>	<i>4.8</i>	<i>6.8</i>	<i>6.8</i>	<i>6.8</i>
<i>Total Supply</i>	<i>83.5</i>	<i>88.3</i>	<i>90.3</i>	<i>90.3</i>	<i>90.3</i>

SOURCE: San Francisco Public Utilities Commission. 2013. *2013 Water Availability Study for the City and County of San Francisco* May. Table 6, p. 13.

a. These sources consist of groundwater use at Castlewood (not connected to RWS) of approximately 0.4 mgd, and subsurface diversions to Sunol Golf of approximately 0.3 mgd taken from the Sunol Infiltration Gallery.

b. The North Westside Groundwater Basin is currently used for irrigation. In-City groundwater use will be expanded for potable use with the San Francisco Groundwater Supply Project. Approximately 1.2 mgd of existing groundwater use will be converted to potable use (for a total of 4.0 mgd) once the Westside Recycled Water project is completed as a substitute irrigation water supply.

c. The implementation of proposed future supply sources is contingent on completion of necessary project level environmental review and project approval. If these supplies are not available as planned, and if retail demand exceeds the available water supply, the Water Supply Agreement allows the SFPUC to import additional water from the RWS, with mitigation implemented by the SFPUC and potential environmental surcharges if RWS deliveries exceed the 265 mgd interim supply limitation. (Total RWS deliveries in FY11/12 were 219.4 mgd.)

In response to comments received, the following text on page 5.13-3 has been revised to note the deadline extension for the 2015 UWMP.

### ***Urban Water Management Planning Act***

In 1983, the California Legislature enacted the Urban Water Management Planning Act (*Water Code, Section 10631*). The act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. A water supplier is required to prepare an Urban Water Management Plan (UWMP) to document water supplies available during normal, single dry, and multiple dry water years during a 20-year projection and the existing and projected future water demand during a 20-year projection. The water supplier must update the Urban Water Management Plan every 5 years (by December 31 in years ending in five and zero). The deadline for submittal of the 2015 UWMP to the California Department of Water Resources has been postponed to July 1, 2016. The SFPUC's 2010 UWMP was adopted on June 14, 2011.

The following text has been added to page 5.13-2 to provide a description for Senate Bill 221.

### ***Senate Bill 610 and Senate Bill 221***

The State of California, through the passage of Senate Bill 610, requires that a jurisdiction prepare a Water Supply Assessment (WSA) for development projects that meet certain criteria, including a project that creates demand for 500 or more housing units. The SFPUC prepared a WSA for the Proposed Project (see Appendix 4.13 of this Draft EIR/EIS), as described under Impact UT-3, below. Senate Bill 221 prohibits approval of subdivisions consisting of more than 500 dwelling units unless there is verification of sufficient water supplies for the project from the applicable water supplier(s). This requirement also applies to increases of 10 percent or more of service connections for public water systems with fewer than 500 service connections. The law defines criteria for determining "sufficient water supply" such as using normal, single-dry, and multiple-dry year hydrology and identifying the amount of water that the supplier can reasonably rely on to meet existing and future planned use.

The following text on page 5.13-14 has been revised address comments from the SFPUC. Footnote nine was moved to the end next sentence.

The SFPUC recently adopted the 2010 UWMP, which provides water demand projections for the City and County of San Francisco through the year 2035. These projections are based on Association of Bay Area Governments (ABAG) *Projections 2009* and ABAG *Sustainable Communities Strategy Baseline Update 2010*, which provide projected growth for the city through the year 2035. In coordination with the adoption of the 2010 UWMP, the SFPUC also adopted a resolution affirming that future development in the City and County of San Francisco had



been incorporated into the UWMP's water demand projections. However, in 2012, the San Francisco Planning Department updated its Land Use Allocation (LUA 2012) increased the estimated number of new dwelling units and jobs over the previous LUA 2009 projections. Due to the LUA 2012 projections, the SFPUC came to the conclusion that its 2010 UWMP no longer accounts for every project requiring a WSA. Therefore, the Proposed Project is required to prepare a WSA that documents the SFPUC's current and projected water supplies when compared to demands associated with the LUA 2012 projections. Water projections associated with the LUA 2012 projections can be found in the 2013 Water Availability Study for the City and County of San Francisco. In the WSA, the SFPUC concluded that there are adequate water supplies to serve the Proposed Project and cumulative retail water demands during normal years, single dry years, and multiple dry years over a 20-year planning horizon from 2015 through 2035. Additionally, the Planning Department confirmed that the population growth and associated water demand of the Proposed Project was considered in the LUA 2012's projections of future water demand (see Appendix 4.13). The Proposed Project would not result in major expansion of the water supply system and SFPUC would maintain sufficient water supplies to serve the Proposed Project from existing resources.<sup>9</sup> Additionally, SFPUC would be able to accommodate the water demand of the Proposed Project with existing water treatment facilities and ongoing expansion of these facilities as planned in the WSIP.

## Comment UT-2: Stormwater Regulations

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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"Chapter 3 Comments. 3-11, Paragraph 3: The San Francisco Green Building Ordinance (SFGBO) does not require compliance with the Stormwater Design Guidelines (SDG). The Stormwater Management Ordinance (SMO) requires compliance with the Stormwater Design Guidelines. Remove language stating SDG is a requirement of the SFGBO throughout the document. Include SMO requirements in the SMO section." (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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"3-12, Paragraph 1: Please remove description of LEED SS6.2. Stormwater treatment (LEED SS6.2) is only required for projects in a separate sewer area per the SMO. The proposed project would be served

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<sup>9</sup> Paula Kehoe, Director of Water Resources, San Francisco Public Utilities Commission, Letter to Bill Wycko RE Water Supply Assessment for the Proposed Potrero HOPE SF Project (July 6, 2011) (see Appendix 4.13).

by the combined sewer system and the applicable SDG require that the project to manage stormwater for peak rate and total volume (e.g., LEED 6.1).” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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“Chapter 5 Comments. Page 5.10-16, Table 5.10-2: The SFGBO does not require compliance with the Stormwater Design Guidelines. The Stormwater Management Ordinance requires compliance with the SDG. Please remove SDG as a requirement of the SFGBO throughout the document.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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“Page 5.17-6, Paragraph 3-4: SMO requirements are referenced incorrectly. Please remove the sentence including two bullets describing “treatment” requirements as those are for separate sewer areas only. (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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Response UT-2

These comments raise concerns regarding the applicability of stormwater regulations. The following text on pages 3-11 through 3-12 has been revised to correctly state the requirements of the San Francisco Green Building Ordinance and remove the mention of LEED SS6.2.

The ordinance requires compliance with the applicable LEED performance standards or GreenPoint Rated checklists (which applies mostly to residential buildings) for New Construction, Version 2.2, LEED criteria Sustainable Sites (SS) 6.1 and ~~SS6.2~~ for stormwater management, as well as the best management practices (BMPs) and ~~Stormwater Design Guidelines of the SFPUC (1304C.0.3)~~. Additionally, for high-rise residential buildings (1304C.1.3), new group B (Business) and M (Mercantile) occupancy buildings (1304C.2), and new large commercial buildings (1304C.2.2), water efficient landscaping (LEED credit WE1.1) and water conservation are required (LEED credit WE3.2).

~~LEED SS6.2 addresses stormwater management and has been adopted by the San Francisco Stormwater Design Guidelines for MS4s.<sup>7</sup>~~ The stormwater management program seeks to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event (for semi-arid watersheds; in San Francisco, treatment of 90 percent is interpreted as treating runoff produced by a rain event generating 0.75 inch)

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<sup>7</sup> An MS4 is a conveyance or system of conveyances that is owned by a state, city, town, village, or other public entity that discharges to waters of the U.S.; designed or used to collect or convey stormwater (including storm drains, pipes, ditches, etc.); not a combined sewer; and not part of a Publicly Owned Treatment Works (sewage treatment plant).

using acceptable BMPs. In addition, BMPs used to treat runoff must be capable of removing 80 percent of the average annual post development total suspended solid load contained in stormwater runoff. The BMPs are considered to meet these criteria if (1) they are designed in accordance with standards and specifications from a state or local program that has adopted these performance standards, or (2) there are filed performance monitoring data that demonstrate compliance with the criteria. LEED WE1.1 addresses water efficient landscaping. New construction that is required to comply with this credit must submit documentation verifying a minimum of 50 percent reduction in use of potable water for landscaping (compared to the mid-summer baseline case). LEED WE3.2 addresses water use reduction. Permit applicants must submit documentation demonstrating achievement of a minimum 20 percent reduction in the use of potable water. Effective January 1, 2011, the required reduction in use of water is 30 percent (compared to the water use baseline calculated for the building [not including irrigation] after meeting the USEPA Energy Policy Act of 1992 requirements).

Table 5.10-2 on page 5.10-16 has been revised to correctly state the requirements of the San Francisco Green Building Ordinance.

The Proposed Project would be subject to and would comply with GHG reduction measures as shown in Table 5.10-2.

<b>Table 5.10-2 City Greenhouse Gas Regulations Applicable to the Proposed Project and Alternatives</b>	
<b>Regulation or Program</b>	<b>Requirement</b>
San Francisco Green Building Requirements for Stormwater Management	Requires all new development or redevelopment disturbing more than 5,000 sf of ground surface to manage stormwater on-site using low impact design. Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City's stormwater ordinance and stormwater design guidelines.

The following text on page 5.17-6 has been revised to correctly describe Stormwater Maintenance Ordinance requirements.

**San Francisco Public Utilities Commission’s Stormwater Management Ordinance**

On May 22, 2010, the SFPUC enacted the Stormwater Management Ordinance to improve San Francisco’s environment by reducing stormwater runoff and runoff pollution in areas of new development and redevelopment through compliance with the *Stormwater Design Guidelines*. The *Stormwater Design Guidelines* detail the engineering, planning, and regulatory framework for designing new infrastructure in a manner that reduces or eliminates pollutants commonly found in urban runoff. ~~Compliance with the SFPUC’s Stormwater Management Ordinance requires all~~

~~developments or redevelopments disturbing 5,000 square feet or more of ground surface to:<sup>7</sup>~~

- ~~■ Capture and treat the rainfall from a design storm of 0.75 inch using acceptable best management practices (BMPs)~~
- ~~■ Complete a Stormwater Control Plan (SCP) demonstrating how the project will capture and treat rainfall from the 0.75 inch design storm~~

The following text on page 5.13-5 thought 5.13-6 has been revised to correctly state the requirements of the San Francisco Green Building Ordinance and Stormwater Management Ordinance.

### **San Francisco Green Building Ordinance**

In 2008, the City adopted the San Francisco Green Building Ordinance (SFGBO) as Chapter 13C, *Green Building Requirements*, of the San Francisco Building Code. The purpose of the SFGBO is to promote the health, safety, and welfare of San Francisco residents, workers, and visitors by minimizing the use and waste of energy, water, and other resources in the construction and operation of the buildings within the City; and by providing a healthy indoor environment. This requires green building practices and LEED certification for new residential and commercial buildings in the city.

For site permits received on or after July 1, 2012, residential development will be required to achieve the following minimum standards:

- New High-Rise Residential (5 or more units and 75 feet or more in height to the highest occupied floor) – 75 GreenPoint Rated (GPR) points or 50 LEED points
- All Other New Residential (1 or more units and less than 75 feet in height to highest occupied floor) – 75 GPR points or LEED Silver.

The SFGBO requires compliance with the applicable LEED performance standards or GreenPoint Rated checklists (which applies mostly to residential buildings) for New Construction, Version 2.2, criteria SS6.1 and SS6.2 for stormwater management, as well as the BMPs and Stormwater Design Guidelines (SDG) of the SFPUC (1304C.0.3). Additionally, for high-rise residential buildings (1304C.1.3), new group B (Business) and M (Mercantile) occupancy buildings (1304C.2), and new large commercial buildings (1304C.2.2), water efficient landscaping (LEED WE1.1) and water conservation are required (LEED WE3.2).

~~LEED SS6.1, Stormwater Design: Quantity Control, addresses stormwater management and has been adopted by the San Francisco SDG for combined sewer areas. The intent of this credit is to limit disruption of stormwater runoff by reducing~~

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<sup>7</sup> SFPUC. 2009. San Francisco Stormwater Design Guidelines. Available: <<http://www.sfwater.org/modules/showdocument.aspx?documentid=2779>>. Accessed: May 22, 2014.

~~impervious cover, promoting infiltration, reducing or eliminating pollution from stormwater runoff, and eliminating contaminants.~~

### **Stormwater Management Ordinance**

The San Francisco Stormwater Management Ordinance became effective May 22, 2010. The intent of the Stormwater Management Ordinance is to protect and enhance the water quality in the City and County of San Francisco's sewer system, stormwater collection system and receiving waters pursuant to, and consistent with federal and state laws, lawful standards, and orders applicable to stormwater and urban runoff control, and the City's authority to manage and operate its drainage systems. The Stormwater Management Ordinance is enforced through implementation of the SDG, ~~described under SFGBO, above.~~

The following text on page 5.17-13 has been revised to avoid incorrect reference to Stormwater Management Ordinance requirements.

~~According to the SFPUC's Stormwater Management Ordinance, if the project disturbs greater than 5,000 square feet of land due to the demolition of housing and roads, the City is required to~~ The Project proposes to implement BMPs (i.e., LID measures) to capture and treat rainfall. These measures will help improve drainage patterns within and around the Project site. As identified in Chapter 2, *Project Alternatives and Project Description*, and in Figure 5.17-1, the Proposed Project may include the following stormwater management strategies: These strategies are outlined in the *Design Standards and Guidelines* (Design Guidelines) document prepared for the Proposed Project.

### Comment UT-3: Wastewater

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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"Page 2-16, Paragraph 4: If the project proposes to reuse existing sewer laterals, they must be checked for capacity and condition. The laterals shall be televised by the project sponsor. Resultant television inspection videos shall be reviewed and approved by SFPUC WWE/CSD. Reuse or replacement of laterals shall be at sole discretion of SFPUC WWE/CSD.

Proposals for new public sewer infrastructure (lower laterals, catch basins, culverts, mains, manholes, etc.) shall be submitted for review and approval by SFPUC WWE/CSD. All sewer infrastructure shall

comply with applicable City standards. Please contact SFPUC WWE/CSD at sewerinspections@sfgwater.org for review.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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Response UT-3

The Proposed Project would use and upgrade existing sewer laterals as necessary. If new public sewer infrastructure is necessary, the Proposed Project would be subject to review and approval by SFPUC Wastewater Enterprise, Collection System Division. The Proposed Project would comply with applicable City standards and coordinate with SFPUC regarding any changes to sewer infrastructure associated with the Project site. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

Comment UT-4: Construction Water Use

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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“Page 5.17-9, Paragraph 3: Section 5.9 (Air Quality), page 5.9-25, paragraph 5 indicates that non-potable water would be used for dust control during construction. Article 21, Section 1100 et seq. of the San Francisco Public Works Code (also known as CCSF Ordinance 175-91) states that non-potable water must be used for dust control activities and soil compaction. Soil compaction is mentioned in Section 5.16 (Geology and Soils) and Section 5.17 (Hydrology and Water Quality), and must comply with CCSF Ordinance 175-91. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge. For more information please contact (415) 695-7358.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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Response UT-4

The project applicant will coordinate with SFPUC regarding non-potable water use for dust control during construction. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

## Comment UT-5: Project Water Use and Demand

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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“Page 5.13-13, Paragraph 3: Although the project is not located within the CCSF’s Recycled Water Ordinance Area, the SFPUC would like to have a better understanding of the proposed project’s water uses and associated demands. The SFPUC is interested in evaluating the potential to provide recycled water to the area.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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## Response UT-5

The project applicant will coordinate with SFPUC regarding the potential for recycled water use at the Project site. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

## Comment UT-6: Project Water Distribution System

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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“Pages 4. 13-1 to 4. 13-5, Project Water Distribution System: The project sponsor is required to design the project’s water distribution system to conform to the SFPUC design standards for new water mains, services, and fire hydrants.

SFPUC suggests that prior to the beginning the design of the project water distribution system that the project sponsor meet with the Engineering staff from the SFPUC City Distribution Division (CDD) to discuss and obtain copies of SFPUC design standards. In addition, the project sponsor will need to submit the 65% and 95% design drawings to COD staff for review and approval.

The project sponsor will also need to pay for SFPUC COD design services for the review of design submittals, as well as COD construction services for the inspection of the project’s water distribution system.

The project sponsor will need to conduct a hydraulic analysis of the project to determine if the existing SFPUC water distribution system is sufficient to meet the project's potable and fire suppression demands. It is the responsibility of the project sponsor to pay for the hydraulic analysis. If it is determined that existing SFPUC water distribution system would not meet the project's demands, then it will be the project sponsor's responsibility to pay for the design and construction of required upgrades to SFPUC water facilities. Alternatively, the project sponsor can pay SFPUC COD for design and construction services. In addition, the SFPUC will perform all required disinfection and connections of new mains and services; the project sponsor is required to pay for these services." (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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#### Response UT-6

The project applicant will comply with all SFPUC regulations associated with water distribution system. The project applicant will conduct all required analyses and pay for required services. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

#### Comment UT-7: Use of Wells

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-SFPUC

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"Page 5-17-10, Paragraph 2: If wells would be used for groundwater dewatering, the use of wells would need to comply with San Francisco's Soil Boring and Well Regulation Ordinance, adopted as Article 12B of the San Francisco Health Code. The use of a groundwater well may affect the beneficial uses of San Francisco's aquifers, and shall be reviewed and approved by the San Francisco Department of Public Health and the SFPUC." (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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#### Response UT-7

As discussed in Section 4.17, *Hydrology and Water Quality*, during geotechnical exploration, groundwater was not encountered at the Project site. Groundwater is not used for any purpose at the Project site. In the event that dewatering is necessary during excavations for foundations and other subgrade features (the depth of which would be determined during design-level engineering), such activities would be regulated by the Batch Wastewater Discharge Permit issued by the SFPUC. The



anticipated depth of excavation is 42.5 feet, although excavation may be deeper, depending on the locations of subdrains and other utilities. Excavation at this depth will likely require groundwater dewatering.

Although not expected, if the use of wells for groundwater dewatering is necessary, the Proposed Project would comply with San Francisco's Soil Boring and Well Regulation Ordinance, adopted as Article 12B of the *San Francisco Health Code*. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

#### Comment UT-8: Solid Waste Services

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Schurnghammer

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"What about garbage pickups? Will that be privatized or still the City pick up?" (*Marlene Schurnghammer, letter, undated [I-Schurnghammer]*)

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#### Response UT-8

Solid waste pickup associated with the Proposed Project will be collected and hauled by Recology to the transfer station near Candlestick Point, and recycled as feasible. Non-recyclables will be disposed of at the Altamont Landfill or the Ostrom Road Landfill, as mentioned on page 5.13-15 of the Draft EIR/EIS. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

### 3.14 PUBLIC SERVICES

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.14 and 5.14, *Public Services*, of the Draft EIR/EIS. These include topics related to:

- PS-1: Police
- PS-2: Schools

## Comment PS-1: Police

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Fay (1)

I-Serwer and Dreschler (1)

I-Serwer and Dreschler  
(2)

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“G. And we know that any community will not flourish if safety and security is not a given. We voice our support for maintaining the SFPD Substation in the new development, as well as increased street lighting throughout the development, and on the adjacent streets, including, Wisconsin, 25<sup>th</sup> Street, 26th Street, Carolina and Connecticut.” (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)

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“Finally, safety and security must remain a top priority until the area is deemed to be free of the high levels of criminal activity that currently exist. I support maintaining the SFPD Substation in the new development and introducing a non-profit, such as Nadine Burke Harris’ Center for Youth Wellness, which has created programs to overcoming trauma that the community of the Annex - Terrace has certainly suffered.” (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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## Response PS-1

These comments voice support for maintaining the existing police substation located at 1090 Connecticut Street on the Project site. The current police substation would remain onsite throughout construction and space would be reserved in the Community Center of the Proposed Project for the substation. It is anticipated that the existing substation would remain in its current location until the building in which it is located is demolished. The substation would temporarily be relocated elsewhere onsite throughout the remaining redevelopment of the property and then permanently relocated to the Community Center. The substation would be staffed by the same number of officers as currently staffed at this substation. No further response is required as the comment does not address the adequacy of the Draft EIR/EIS.

## Comment PS-2: Schools

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Marini

I-Schurnghammer

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“Lack of Appropriate Infrastructure: The plan fails to contemplate how residents will easily access commercial, social, educational and recreational facilities in the neighborhood. For example, it is clear from construction and trailer bungalows at Starr King Elementary School that there is already a significant need for classroom space in the immediate vicinity, let alone other facilities and services needed for multigenerational residents. However, the limited options within the planned development cannot possibly be sufficient given the density levels proposed. Moreover, as parking is severely limited and it is virtually impossible for all but the most athletically fit individuals to walk or bicycle up the hills, it is unclear how public transit services will be able to meet all needs.” (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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“Also, what happens to all the children attending this district’s schools? Will they have to be relocated to other districts? The schools receive funding for these children so does that mean the schools lose out too?” (*Marlene Schurnghammer, letter, undated [I-Schurnghammer]*)

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## Response PS-2

These comments express concern over the capacity at the local schools and whether or not the population growth induced by the Proposed Project could be accommodated. As discussed in Section 5.14, *Public Services*, schools that would serve the Project site have the capacity to accommodate the projected student growth associated with the Proposed Project. The Proposed project would result in approximately 742 school-aged children. However, based on the existing number of affordable housing units at the Project site, there could be up to 422 existing students already attending SFUSD schools. As such, the net increase in SFUSD students as a result of the Proposed Project would likely be approximately 320 new students. The schools that serve the Project Site include Starr King Elementary School (K–5), Daniel Webster Elementary School (K–5), and International Studies Academy (grades 6–12). Assuming that SFUSD student generation as a result of the Proposed Project is distributed evenly among the grade levels, the Proposed Project could add approximately 148 elementary school students and 172 middle school and high school students. This is a conservative estimate assuming all school-aged children associated with the Proposed Project would attend the nearest schools. Starr King Elementary School and Daniel Webster Elementary School have a remaining capacity of 601, and the

International Studies Academy has a remaining capacity of 373. Therefore, the Proposed Project would not have a significant impact on schools.

Section 5.04, *Socioeconomics and Community*, of the Draft EIR/EIS stated that it is possible that students could be required to change schools, depending on where in the city families relocate. However, as noted above, students may be able to continue attending their school of choice as schools are not assigned based solely on geography. The entire Project site population would not be relocated simultaneously. Because the Proposed Project would be constructed in phases many residents could choose to remain onsite through the length of construction. Residents that may choose to temporarily relocate would be given the option to return, thereby not permanently affecting existing community connections and school populations.

### 3.15 BIOLOGICAL RESOURCES

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.15 and 5.15, *Biological Resources*, of the Draft EIR/EIS. These include topics related to:

- BI-1: Trees
- BI-2: Habitat for Pollinators

#### Comment BI-1: Trees

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA  
I-Abel (1)

I-Abel (2)

I-Fay (2)

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“Loss of Significant Trees: The project would remove 249 significant trees, which are defined as trees above 20 feet in height, or with a canopy greater than 15 feet in diameter, or with a trunk greater than 12 inches in diameter at breast height (p. 4.15-17). While the project would replace trees according to the Urban Forestry Ordinance, which requires one street tree for every 20 feet of street frontage (p. 2-14), it is not clear whether this represents a 1:1 replacement.

The landscaping on the project site would also consist of park trees, shrubs, native grasses, and lawn, and the DEIR/DEIS states that trees planted on the project site would include a mix of evergreen and deciduous, chosen to provide a variety and resiliency to disease and aid in stormwater management (p.5. 15–18). While these are important tree selection criteria, we note that President Obama issued a federal memorandum in June 2014 entitled *Creating a Federal Strategy to Promote the Health of Honey Bees*

*and Other Pollinators*<sup>16</sup> which directs Federal agencies to take steps to protect and restore domestic populations of pollinators. To help achieve this goal, CEQ issued an addendum to its sustainable landscape guidance on October 22, 2014 entitled *Supporting the Health of Honey Bees and other Pollinators*<sup>17</sup> which provides guidance to help Federal agencies incorporate pollinator friendly practices in new construction and landscaping improvements.

*Recommendations:* Clarify in the Final EIR/EIS whether the project will replace all significant trees that are removed during grading. We recommend tree replacement at a minimum ratio of 1: 1 and that the responsible party for tree maintenance be specified.

We recommend that the landscape plan include pollinator-friendly plant species and that the project incorporate pollinator-friendly practices into site landscape performance requirements, particularly regarding the use of pesticides, and ensure all maintenance personnel are made aware of these practices." (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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"Speaking of increase, the plans call for up to 1,700 units, and the units look to be built very dense with interior courtyards and very little outside space. The mature trees currently helping process the pollution will be ripped out. I share with my neighbors their concerns that the build is way too dense for Potrero Hill, that there is not enough open space, and that trees should be preserved whenever possible." (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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"1. TREES Chapter 4. 4-15-17 -- 4-15-18: 249 significant trees were identified on the Project site. 177 are in fair or better condition. Since it is a scientific fact the trees absorb tons of carbon yearly why are they all being destroyed? They are mature trees, the proposed new ones will take decades to match the carbon absorption of these. Please reconsider the destruction of the mature trees. (*Jane Fay, letter, December 11, 2014 [I-Fay (2)]*)

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"I am very concerned that they're going to be cutting down all the trees over there, there's going to be a lot of smog going on, then we don't have any mature trees." (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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<sup>16</sup> See <http://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promote-health-honey-b>

<sup>17</sup> See [http://www.whitehouse.gov/sites/default/files/docs/supporting\\_the\\_health\\_of\\_honey\\_bees\\_and\\_other\\_pollinators.pdf](http://www.whitehouse.gov/sites/default/files/docs/supporting_the_health_of_honey_bees_and_other_pollinators.pdf)

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Response BI-1

These comments address trees currently existing on the Project site and the potential impact of the Proposed Project on these trees. As discussed in Section 4.15, *Biological Resources*, of the Draft EIR/EIS there are 254 significant trees located on the Project site (249 on site, and five overhanging on to the site), and no landmark or street trees. As stated in Chapter 2, *Project Alternatives and Project Description*, the Proposed Project would remove all of the trees on the Project site as part of the re-grading of the site and the realignment of the street rights-of-way. Removal of the onsite trees would require a permit from the Department of Public Works under the Urban Forestry Ordinance, and the permit would include conditions that would govern the replacement planting of trees as part of the Project development. *Planning Code Section 138.1* requires one street tree for every 20 feet of street frontage. To the extent feasible, the project applicant would replace removed trees on a 1:1 ratio.

The mature trees existing on the Project site have the potential to provide habitat for nesting raptors and other migratory birds. Disruption of nesting birds, resulting in the abandonment of active nests, or the loss of active nests through structure removal would be a potentially significant impact. The implementation of Mitigation Measure M-BI-4a and Mitigation Measure M-BI-4b, which require preconstruction surveys for nesting birds and establishment of buffer zones during construction for nesting birds, would avoid an adverse effect on nesting migratory birds and raptors.

Development is contemplated to occur in three non-overlapping phases, spanning from about 2015 to 2025; therefore, not all of the existing trees would be removed at one time. By the time the final phase is underway, trees replaced during the earlier phases would already be established. It is the responsibility of the project applicant to maintain or appoint another party to maintain new trees and landscaping associated with the operation of the Proposed Project.

Comment BI-2: Habitat for Pollinators

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA

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“Loss of Significant Trees: The project would remove 249 significant trees, which are defined as trees above 20 feet in height, or with a canopy greater than 15 feet in diameter, or with a trunk greater than 12 inches in diameter at breast height (p. 4.15-17). While the project would replace trees according to

the Urban Forestry Ordinance, which requires one street tree for every 20 feet of street frontage (p. 2-14), it is not clear whether this represents a 1:1 replacement.

The landscaping on the project site would also consist of park trees, shrubs, native grasses, and lawn, and the DEIR/DEIS states that trees planted on the project site would include a mix of evergreen and deciduous, chosen to provide a variety and resiliency to disease and aid in stormwater management (p.5. 15–18). While these are important tree selection criteria, we note that President Obama issued a federal memorandum in June 2014 entitled *Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators*<sup>18</sup> which directs Federal agencies to take steps to protect and restore domestic populations of pollinators. To help achieve this goal, CEQ issued an addendum to its sustainable landscape guidance on October 22, 2014 entitled *Supporting the Health of Honey Bees and other Pollinators*<sup>19</sup> which provides guidance to help Federal agencies incorporate pollinator friendly practices in new construction and landscaping improvements.

*Recommendations:* Clarify in the Final EIR/EIS whether the project will replace all significant trees that are removed during grading. We recommend tree replacement at a minimum ratio of 1: 1 and that the responsible party for tree maintenance be specified.

We recommend that the landscape plan include pollinator-friendly plant species and that the project incorporate pollinator-friendly practices into site landscape performance requirements, particularly regarding the use of pesticides, and ensure all maintenance personnel are made aware of these practices." (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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Response BI-2

Landscaping on the Project site would consist of street trees, park trees, shrubs, native grasses, and lawn. Trees planted on the Project site would include a mix of evergreen and deciduous species, chosen to provide variety and resiliency to disease, and to aid in stormwater management. Shrubs and groundcovers would be chosen to provide an intermediate scale of detail and texture between trees and buildings at parks, streets, and residential areas. Final landscaping and maintenance plans have not been developed. However, if the proposed Project is approved, the project applicant would consider planting pollinator plant species on the Project site to the extent feasible.

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<sup>18</sup> See <http://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promotehealth-honey-b>

<sup>19</sup> See [http://www.whitehouse.gov/sites/default/files/docs/supporting\\_the\\_health\\_of\\_honey\\_bees\\_and\\_other\\_pollinators.pdf](http://www.whitehouse.gov/sites/default/files/docs/supporting_the_health_of_honey_bees_and_other_pollinators.pdf)

## 3.16 HAZARDS AND HAZARDOUS MATERIALS

The comments and corresponding responses in this section cover topics in Chapters 4 and 5, Sections 4.18 and 5.18, *Hazard and Hazardous Materials*, of the Draft EIR/EIS. These include topics related to:

- HZ-1: Construction Period Hazardous Materials Emissions
- HZ-2: Asbestos and Lead
- HZ-3: Dust Control Plan

### Comment HZ-1: Exposure of Hazardous Materials to Onsite Residents

This response addresses a comment from the commenter listed below; each comment on this topic is quoted in full below:

I-Brown

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“I honestly feel the need for change and supporting the process, only if the containment of dust and chemical will be handle properly while some tenants decide to stay on the premises. Growing up in low-income housing had a lot of disadvantages, challenges, and barriers to overcome I have made it, but most have not. I support only if the constructors will properly contain the dust and chemicals while residents are on site.” (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

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### Response HZ-1

This comment raises concerns regarding the exposure of residents of the Project site to hazardous chemicals and dust, and containment of hazardous substances.

Containment of hazardous substances is discussed in Section 5.18, *Hazards and Hazardous Materials*, of the Draft EIR/EIS. This response addresses the containment of hazardous substances during the construction period. Refer to Section 3.9, Response AQ-1, to see responses that address the containment of dust, during the construction period.

As stated in Section 5.18, construction activities would involve substantial use of heavy equipment containing fuels and other hazardous products, along with extensive amounts of concrete products, construction materials, and architectural finish items. These hazardous materials and vehicles would remain onsite during the entire construction horizon which could span up to ten years. Accidental releases of hazardous materials during construction activities could result in releases of hazardous materials into the air, or could impact soil and/or groundwater quality, which could result in adverse health effects to the public, including residents on the Project site.



As described in Impact HY-1 in Section 5.17, *Hydrology and Water Quality*, in the Draft EIR/EIS, the contractor would be required to implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP requires an inventory of the products used and/or expected to be used and the end products that are produced and/or expected to be produced; and requires storing chemicals in watertight containers or in a storage shed (completely enclosed) with appropriate secondary containment to prevent any spillage or leakage, implementing procedures that effectively address hazardous and nonhazardous spills, developing a spill response and implementation element of the SWPPP prior to commencement of construction activities, and good housekeeping for vehicle storage and maintenance to prevent oil, grease, or fuel from leaking into the ground, storm drains, or surface waters. Implementation of the SWPPP would minimize the potential exposure of residents to hazardous substances during a wet weather event.

Demolition of the existing housing units would be subject to comply with Section 3425 of the *San Francisco Building Code*, Work Practices for Lead-Based Paint on Pre-1979 Building and Steel Structures. This section of the *San Francisco Building Code* sets forth performance standards, including establishment of containment barriers. As dictated by Section 3425, all persons performing demolition of structures with lead-based paint must make all reasonable efforts to prevent the migration of lead paint contaminants beyond the containment barriers during the course of the indoor and outdoor work. In addition, Section 3425 requires that any person performing regulated work with lead-based paint must make all reasonable efforts to remove all visible lead-based paint contaminants from all regulated areas of the property prior to completion of the work. Notice requirements include a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable.

Exposure of Project site residents to asbestos-containing materials (ACM) could pose health risks if asbestos fibers become airborne during demolition activities. As discussed in Section 5.18, presence of asbestos in the existing public housing units is likely since the buildings were constructed prior to USEPA ban of the use as a building material. However, demolition of existing buildings and structures would be subject to the Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, Asbestos Demolition, Renovation, and Manufacturing. As stated in Section 5.18, the BAAQMD determined that compliance with BAAQMD Regulation 11, Rule 2 would ensure that demolition activities would not result in airborne emissions of ACM that would result in a significant impact.

During construction, earthmoving activities could cause asbestos in soil and naturally occurring asbestos (NOA) in serpentine bedrock to become airborne and expose Project site residents to hazardous materials. As discussed in Section 5.18, of the Draft EIR/EIS, the following mitigation measures would be implemented to reduce the potential exposure of onsite residents to hazardous substances. The measures include Mitigation Measure M-HZ-2.1 – Voluntary Remedial Action Program Applications and Work Plans; Mitigation Measure M-HZ-2.2 – Site Mitigation Plan; Mitigation Measure M-HZ-2.3 – Dust Control Plan and Worker Health and Safety Plan; and Mitigation

Measure M-HZ-2.4 – Underground Storage Tanks. Please refer to Section 5.18, of the Draft EIR/EIS for a full description of these measures.

In addition, as discussed in Section 5.9, *Air Quality*, of the Draft EIR/EIS, implementation of Mitigation Measure M-AQ-4, Construction Emissions Minimization, would reduce the health risks associated with elevated PM2.5 concentrations. Refer to Section 3.9, Response AQ-2, in this chapter, for further discussion regarding Air Quality health risks.

As discussed in Section 5.18, *Hazards and Hazardous Materials*, Cal/OSHA has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California in accordance with regulations specified in CCR Title 8. The Cal/OSHA workplace regulations have been promulgated over time and are effective in reducing potential risks to workers to the extent required by law. Such measures including reducing the amount of time a worker might be exposed to a hazardous material and the use of personal protective equipment, along with training programs.

Implementation of a SWPPP and Mitigation Measures M-HZ-2.1 thru M-HZ-2.4 and M-AQ-4 would reduce exposure of Project site residents, during construction, to hazardous substances. No further response is required, and no revision to the Draft EIR/EIS is necessary.

#### Comment HZ-2: Asbestos and Lead

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)

I-Wang

I-Abel (2)

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“Another concern is the asbestos in the rock. I want to know exactly what safety measures will be taken, and what % of asbestos is in various rock samples, since we will have to live with a decade of toxic substances being released in to the air – not to mention a decade of dust, noise, and congestion - during the rebuild. Our neighborhood already deals with very high rates of asthma and cancer. This asbestos issue MUST be addressed and not swept under the rug in any manner. What will be offered to the neighbors that border the rebuild as the toxic materials sweep over us?” (Lee Abel, letter, January 4, 2015, [I-Abel (1)])

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“My concerns about the development are pretty specific and relate to the health risks associated with the construction activities. My 2 children attend Starr King Elementary School - which is located right across the street from the proposed development. Ever since I heard about this development it has

worried me that my kids will have greater exposure to lead, asbestos or other toxic substances due to this construction.” (Suling Wang, email, January 6, 2015 [I-Wang])

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“I’m concerned there’s serpentine rock, which has a known asbestos in it. I think in the report there was a percentage of how much asbestos, but I couldn’t find it, again, when I went back. It’s kind of thick. I’d really like to know what that percentage is. I think it’s critically important that that be right up front with the, you know, 10 years’ of asbestos in the air.” (Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)])

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#### Response HZ-2

This comment raises concerns regarding the exposure of adjacent residents and students at Starr King Elementary School to NOA, dust, and lead during construction of the Project.

As stated in Section 5.18, *Hazards and Hazardous Materials*, the *San Francisco Health Code* Article 22B requires contractors to control dust. The measures that would be implemented to control dust include controlling potential sources of emissions, implementing general dust control methods for traffic, grading, crushing, trenching and excavation, foundation work, and post-construction stabilization of disturbed areas. Because the Project site is greater than 0.5 acres, the contractor would be required to submit a Dust Control Plan to the San Francisco Department of Public Health. Refer to Section 5.9, *Air Quality*, of the Draft EIR/EIS for a discussion of Project compliance with the San Francisco Dust Ordinance and implementation of dust control measures.

Potential exposure of adjacent residents to lead-based paint would be reduced through compliance with Section 3425 of the *San Francisco Building Code*, Work Practices for Lead-Based Paint on Pre-1979 Building and Steel Structures. As stated above, in Response HZ-1, Section 3425 requires reasonable efforts are made to prevent the migration of lead-based paint contaminants beyond the containment barriers during the course of work. Compliance with Section 3425 would reduce the potential exposure of adjacent residents and students to leads-based paint during construction phase.

Exposure of adjacent residents and students at Starr King Elementary to ACM could pose health risks if asbestos fibers become airborne during demolition activities. As discussed in Section 5.18, presence of asbestos in the existing public housing units is likely since the buildings were constructed prior to USEPA ban of the use as a building material. However, demolition of existing buildings and structures would be subject to the Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, Asbestos Demolition, Renovation, and Manufacturing. As stated in the Draft EIR/EIS, the BAAQMD determined that compliance with BAAQMD Regulation 11, Rule 2 would ensure that demolition activities would not result in airborne emissions of ACM that would result in a significant impact.

Refer to Section 3.9, Response AQ-2, for a discussion of cancer risks.

As discussed, above, in Response HZ-2, earthmoving activities could release asbestos from the soil and NOA from the serpentine bedrock. These hazardous materials could become airborne and expose adjacent residents and students at Starr King Elementary. However, with the implementation of the mitigation measures set forth in the Draft EIR/EIS, Section 5.18, potential exposure to hazardous materials during construction would be reduced to less-than-significant levels. The mitigation measures set forth in the Draft EIR/EIS include Mitigation Measure M-HZ-2.1 – Voluntary Remedial Action Program Applications and Work Plans; Mitigation Measure M-HZ-2.2 – Site Mitigation Plan; Mitigation Measure M-HZ-2.3 – Dust Control Plan and Worker Health and Safety Plan; and Mitigation Measure M-HZ-2.4 – Underground Storage Tanks. Implementation of these Mitigation Measures would involve collection of soil samples prior to grading, analyzing soil sample for metals and asbestos, developing a site mitigation plan, submittal of a dust control plan to DPH, and DPH notification of proposed response actions. The mitigation measures identified in the Draft EIR/EIS would reduce potential exposure risks to the public and the environment to a less-than-significant level.

As stated in the Draft EIR/EIS, Section 5.18, implementation of these mitigation measures, SWPPP, and compliance with Section 3425 of the *San Francisco Building Code* would minimize hazardous materials exposure risks to construction works as well as nearby residents and students.

### Comment HZ-3: Dust Control Plan

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-USEPA

I-Wang

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“Additionally, the project site contains naturally-occurring asbestos. The DEIR/DEIS states that the Bay Area Air Quality Management District requires construction contractors to prepare an asbestos dust mitigation plan specifying measures that would be taken to ensure that no visible dust crosses the property boundary. The asbestos dust mitigation plan must also include an asbestos air monitoring plan if residences, businesses, hospitals, and other receptors are located within 0.25 mile of any boundary of an area to be disturbed (p. 5.18-19). Because there will be receptors on the site as well as within in the required buffer area that will require an air monitoring plan, it appears this mitigation measure needs to be modified to account for on-site residents.

*Recommendation:* Ensure that mitigation measures M-AQ-2a and 2b, which require efficient construction equipment (including Tier 4 off-road engines after 2016), are implemented, as well mitigation measure M-AQ-4 - the preparation of a Construction Emissions Minimization Plan.

Identify whether the balancing of cut and fill volumes, such as altering the phasing of construction to reduce truck trips from soil import to and export from the site, has been explored and commit to this measure in the Final EIS if this hasn't already been considered.

Include a mitigation measure to address naturally-occurring asbestos that modifies the BAAQMD requirement for a dust mitigation and monitoring plan to account for, and adequately protect, residences living on-site during construction of other phases of the project." (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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"I appreciate that the EIR lists the measures to control dust and toxic emissions that are required by law, but I still have concerns about how these measures and the dust control plan will be enforced. I would feel a lot more comfortable if there is more detail about how the various safeguards to public health that are described in the EIR will be enforced and who will enforce them. As the consequences of not following the plans can be very serious, there should be a detailed plan for enforcement laid out in anticipation of things possibly going wrong rather than after the fact.

1. Will the BAAQMD require air monitors specifically for asbestos? Where would the monitors be located?
2. Can the particulate monitoring results and asbestos monitoring results be posted on a website so they are easily viewed by the public? This way the community does not have to constantly chase down people in the building dept, BAAQMD or public health dept to find out the results.
3. How quickly are air monitoring results returned and interpreted? Is it possible to get real-time readings of the air quality? If there is a significant delay in interpreting the results and a bad result is obtained. The harm is already done.
4. Who is the person that will be responsible for making sure that all the measures contained in the Dust Control Plan will actually be implemented everyday for the 10+ years duration of this construction project? Will this person be experienced and have expertise in construction and dust control methods? Will this person have the authority to stop construction activities should the activities approach hazardous levels of toxins to public health? Who will have the authority to stop construction activities if the dust control plan or other measures are not being adequately followed?
5. If there will be inspections of the construction site by an independent 3rd party, how often will they be? Who would this 3rd party be and what would be their level of expertise in public health or construction activities? If they are hired and paid for by the developer, would that not be a conflict of interest?
6. What will be the role and requirements of the building inspector, air management inspector and public health dept during the construction?

I understand that nobody involved in the construction intends any harm to public health. But this is the reasoning for my worries. I read about serious problems with construction activities relating to naturally occurring asbestos in the soil that occurred at the Hunter's Point Shipyard construction activities a few years ago. The asbestos monitoring equipment wasn't working properly and nobody noticed for months. The developer on many occasions went over the shut-down limit for asbestos in the air and did not shut-down construction activities. The Department of Public Health issued notice of violations to the developer. There were laws in place and there was a dust control plan, but this did not prevent harm to the community. As a result of these mistakes, people in the community were exposed to higher than legal amounts of asbestos dust for several months and are now left wondering for the rest of their lives if there is going to be any long term effect on their health or the health of their kids. Are there any assurances that the same mistakes won't happen again at the Potrero development?" (*Suling Wang, email, January 6, 2015 [I-Wang]*)

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"While it does make me feel better to see that there are laws in place to protect people from these health hazards, mistakes can be made and sometimes the rules aren't followed. It is not enough to just have the plan and just have laws. In this situation, the negative consequences can be long term and serious. With such a large project it can be very confusing who is in charge or responsible for what and very hard for people to know what is really going on at the construction site. For these reasons, I ask that the plan for enforcement of mitigation measures to be very thought out, detailed and made easily understood and accessible to the community." (*Suling Wang, email, January 6, 2015 [I-Wang]*)

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### Response HZ-3

These comments raise concerns regarding naturally occurring asbestos (NOA); asbestos dust mitigation plan (ADMP), reporting, enforcement, and inspection during construction.

Section, 5.18, *Hazards and Hazardous Materials*, page 5.18-5 of the Draft EIR/EIS states that an Asbestos Dust Mitigation Plan (ADMP) must include an asbestos air monitoring plan if residences and other receptors are located within 0.25 mile of any boundary of an area to be disturbed by construction activities. However, as noted by the commenter, the impact discussion states that BAAQMD would require the contractor to prepare an ADMP, but fails to explicitly state that the ADMP would also include an asbestos air monitoring plan. The following describes ADMP monitoring, enforcement and agency inspection procedures.

Prior to construction, the project applicant or contractor will submit the ADMP to BAAQMD for approval. The approved ADMP will include a provision for asbestos air monitoring, as well as an ambient concentration threshold in which all work must cease if monitored values are in excess, and the ADMP must be implemented at the beginning and maintained throughout the duration of the

operation.<sup>20</sup> Per the California Code of Regulations Title 17, Section 93105, ADMPs that require air monitoring for asbestos must specify the type of air sampling device(s), siting of air sampling device(s), sampling duration and frequency, and analytical method. The ADMP will require the asbestos monitoring results to be posted online in a reasonable timeframe.

In accordance with the regulations, the contractor will be responsible for implementing the ADMP. The contractor would be hired after approval of the Proposed Project. The Project applicant will ensure that the contractor is adept with implementing ADMPs. In the case that applicable asbestos concentrations threshold(s) outlined in the ADMP are exceeded, the developer or its contractor will stop work until the readings from all the monitors are below the threshold(s). In the case the ADMP is not adequately followed, the developer, contractor, BAAQMD, San Francisco Department of Public Health, or the Department of Building Inspection can choose to stop work.

In addition to the ADMP, the following mitigation measures listed in the Draft EIR/EIS would minimize potential health hazard risks to onsite and adjacent residents. The Mitigation Monitoring and Reporting Program will identify who will be responsible for implementation and monitoring of each mitigation measure. Refer to Sections 5.9 and 5.18 of the Draft EIR/EIS for a full description of the mitigation measures listed below.

- Mitigation Measure M-HZ-2.1 – Voluntary Remedial Action Program (VRAP) Application and Work Plans.
- Mitigation Measure M-HZ-2.2 – Site Mitigation Plan (SMP)
- Mitigation Measure M-HZ-2.3 – Dust Control Plan and Worker Health and Safety Plan
- Mitigation Measure M-HZ-2.4-Underground Storage Tanks
- Mitigation Measure M-AQ-4- Construction Emissions Minimization

Inspection of the construction site is the responsibility of the BAAQMD and San Francisco Department of Public Health (DPH), and Department of Building Inspection (DBI). The BAAQMD's Inspection Program of the Compliance and Enforcement Division routinely conducts inspections and audits to ensure compliance, including compliance with the ADMP. The DBI enforces the City's dust control plan for all building, demolition, excavation, grading, foundation, and general construction projects. The role of the inspectors is to ensure compliance with BAAQMD and *San Francisco Health Code* Article 22B, Construction Dust Control Ordinance. The requirements of the inspector are established and approved by the BAAQMD and DBI.

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<sup>20</sup> Bay Area Air Quality Management District. n.d. Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations: Inspection Guidelines. Compliance and Enforcement Division. Available: <[http://www.baaqmd.gov/~media/Files/Compliance%20and%20Enforcement/Policies%20and%20Procedures/inspection\\_guidelines\\_012604.ashx?la=en](http://www.baaqmd.gov/~media/Files/Compliance%20and%20Enforcement/Policies%20and%20Procedures/inspection_guidelines_012604.ashx?la=en)>. Accessed: March 11, 2015.

As in Section 5.18, implementation of the ADMP would protect residents living onsite during construction. As described above, implementation and compliance with the measures set forth in the ADMP are required and inspection to ensure air monitoring for asbestos dust will take place accordingly.

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### 3.17 CUMULATIVE ANALYSIS

The comment and corresponding response in this section cover a topic in all sections of Chapter 5, *Environmental Consequences*, of the Draft EIR/EIS. The topic is related to:

- CA-1: Cumulative Analysis

#### Comment CA-1: Cumulative Analysis

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

O-Potrero Boosters

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“However, that said, today I’m here to comment on the EIR and I do have a couple of concerns with the EIR as it’s currently drafted. First, I feel like there should be an expansion of the cumulative effects analysis. I understand that this is, of course, a moving target and a lot of projects take this sequentially. However, when they’re all occurring at the same time the effect is massive. Right now we have actual data in pipeline for the eastern neighborhood’s plan and not just a plan. This is information that should be integrated into the analysis of the effects of this project. We also have additional plans nearby that are currently in process, or a draft plan, some, like, Pier 70 currently coming on line, some, the Warriors Arena. How these play out will have a catastrophic effect on how transit in and out of what’s a constrained geographic area will work.” (J. R Eppler-Potrero Boosters Neighborhood Association, Public Hearing, December 11, 2014 [O-Potrero Boosters])

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#### Response CA-1

These comments raise concern regarding the scope of the cumulative analysis conducted for the proposed project.



CEQA Guidelines Section 15130(b)(1) states that the approach to the cumulative impact analysis may be based on either of the following approaches, or a combination thereof:

- A list of past, present, and probably future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or areawide conditions.

As stated in Section 5.1, *Approach to the Analysis*, on page 5-6 of the Draft EIR/EIS, the Proposed Project's cumulative analysis is primarily based upon existing planning documents, and/or the Association of Bay Area Governments (ABAG) Projections 2009, depending on the specific impact being analyzed. The Eastern Neighborhoods Rezoning and Area Plans planning document and associated EIR (EN EIR) provided the foundation for much of the cumulative impact analysis for the Proposed Project. The EN EIR evaluated the rezoning options for approximately 2,200 gross acres on the eastern side of San Francisco, including the East SoMa, Mission, Central Waterfront (including Pier 70), and Showplace Square/Potrero Hill neighborhoods. The EN EIR included the analysis of a Pier 70 Mixed-Use District. The Proposed Project site is geographically located within the boundaries of the EN EIR, but Proposed Project itself was not included in the EN EIR. Thus, the EN EIR provided the main reference point for assessing potential cumulative impacts of foreseeable land use changes and development in the area immediately surrounding the Proposed Project site. The geographic context considered for the majority of the environmental topics analyzed in the cumulative scenario was the Eastern Neighborhoods Plan or the immediate Project area. Each technical section of the Draft EIR/EIS designates the cumulative context for each environmental topic's cumulative impact analysis.

In terms of transportation and circulation, the cumulative scenario analyzed is based on the San Francisco County Transportation Authority's Chain Activity Model Process (SF-CHAMP) model. As discussed on page 5.7-21 in Section 5.7, *Transportation*, of the Draft EIR/EIS, SF-CHAMP is the City and County's unique activity-based forecasting tool for future travel demand within the City, taking into account future land use, socioeconomics, and transportation patterns to develop future traffic and transit volumes along all San Francisco roadways and transit lines. This model incorporates the ABAG land use and socioeconomic database and growth forecasts for year 2030 into travel demand estimates and takes into consideration future and planned projects, including the Golden State Warriors Event Center and Mixed-Use Development project at Mission Bay Blocks 29-32. The SF-CHAMP 2030 model run and the Eastern Neighborhoods Plan would consider significant land use changes in the Project vicinity which were included within the Project's cumulative analysis scenario.

### 3.18 OTHER CEQA/NEPA CONSIDERATIONS

The comments and corresponding responses in this section cover topics in Chapter 6, *Other CEQA/NEPA Considerations*, of the Draft EIR/EIS. These include topics related to:

- OC-1: Length of EIR/EIS
- OC-2: Non-English Outreach
- OC-3: NEPA Coverage/Conclusion

#### Comment OC-1: Length of EIR/S

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Reid

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“The main purpose of this letter, however, is to comment on the process and content of the Draft EIR/EIS document itself. My first critique is that, at 926 pages (excluding Appendices), the document is far too long. While I recognize that the preparers are expected to be comprehensively thorough in their preparation and research, the average citizen is unlikely to read a document of nearly a thousand pages. Large quantities of legal and scientific background information could have been incorporated by text reference, by Web hyperlink, or in the Appendices, and information that was repeated across multiple sections and alternative proposals could have been condensed. These changes would have yielded a more manageable document that would encourage more substantive public review, engagement, and participation. My other comments are organized according to the relevant sections of the Draft EIR/EIS.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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#### Response OC-1

This comment raises a concern regarding the length of the Draft EIR/EIS. Often times, an Initial Study (IS) is prepared for a project prior to the preparation of an EIR in an effort to focus the environmental document on those topics requiring detailed analysis and dismissing topics where significant impacts do not occur. For this Project, no IS was prepared prior to the EIR/EIS preparation and thus this environmental document evaluates every CEQA and NEPA topic thoroughly, contributing to the length. Another factor contributing to the length is that the document is a joint CEQA and NEPA document which addresses both state and federal requirements.

## Comment OC-2: Non-English Outreach

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA

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“Environmental Justice: The project site is considered to be extremely low income and is considered an environmental justice community on the basis of both income and ethnicity (p. 4.5-3). The DEIR/DEIS states that input from the community was sought in over 30 workshops, presentations, and project tours which were conducted in English since approximately 76% of the population on the project site are fluent in English (p. 4.5-4). However, the DEIR/DEIS does not specify how project information was communicated to the almost one quarter of the population that was not fluent in English. Executive Order 12898 requires federal agencies to work to ensure effective public participation and access to information.

*Recommendation:* In the Final EIR/EIS, identify whether any public outreach efforts occurred for non-English speakers. Consider conducting language-specific outreach prior to the distribution of the Final EIR/EIS if outreach for non-English speakers has not yet occurred.” (United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA])

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## Response OC-2

These comments raise concerns regarding non-English public outreach effects. The comment requests the disclosure of any public outreach efforts for the project having occurred for non-English speakers during the CEQA/NEPA process. The project’s Notice of Public Hearing and Availability of a Draft EIR/EIS provided a telephone number for those requesting additional information in Chinese and Spanish. Further, a Mandarin (Chinese) and Spanish translator was on-hand at the Public Hearing on December 11, 2014, to provide translation services for non-English speakers who provided oral comments on the Proposed Project. All outreach materials prepared by the project applicant are distributed in English and Spanish. Spanish and Cantonese translation services are available at all large, significant meetings and at most smaller meetings including bi-monthly Community Building Group meetings held by the project applicant.

### Comment OC-3: NEPA Coverage/Conclusion

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. EPA

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“Scope of NEPA Evaluation: The DEIR/DEIS states in a number of resource evaluation chapters that certain impact assessments are not covered under NEPA and are evaluated under the California Environmental Quality Act (CEQA) only. For example, the evaluation of the effects of hazardous materials on schools includes this statement. We believe the scope of NEPA analysis is broader than the document suggests. For example, NEPA documents commonly evaluate a project’s effects on children pursuant to Executive Order 13045 - Protection of Children from Environmental Health Risks and Safety Risks. The DEIR/DEIS also states that effects on stormwater capacity are not covered under NEPA, without explanation, nor are effects on septic tanks, which clearly could have a water quality impact. Additionally, the DEIR/DEIS states that evaluation of effects on paleontological resources are not covered under NEPA. While NEPA does not provide specific guidance regarding paleontological resources, the NEPA requirement that federal agencies take all practicable measures to “preserve important historic, cultural, and natural aspects of our national heritage” (NEPA § 101[b][4]) is commonly interpreted as applying to paleontological materials.

*Recommendation: We recommend revisiting the rationale for determining whether impact assessments are covered under NEPA. When the document concludes that an evaluation is not covered under NEPA, provide a more thorough explanation.” (United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA])*

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### Response OC-3

The topics evaluated in the NEPA discussion were based on the Part 58 Environmental Assessment form template provided by the U.S. Department of Housing and Urban Development (HUD)<sup>21</sup> and San Francisco Planning Department’s adopted Checklist for CEQA.

The Draft EIR/EIS was organized to efficiently group similarities among environmental topics to be covered under both CEQA and NEPA, but in several cases the HUD Checklist did not include criteria specifically listed under CEQA. In those cases, the Draft EIR/EIS indicated that a topic was “not covered under NEPA.”

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<sup>21</sup> Available at: <https://www.hudexchange.info/resource/3140/part-58-environmental-assessment-form/>.

The Mayor’s Office of Housing and Community Development (MOHCD) (the responsible entity to implement HUD environmental regulations in San Francisco) recognizes that the HUD Part 58 Environmental Assessment Checklist is a suggested list of environmental topics for evaluation. The checklist is not an exhaustive list of the relevant topics that should be included in a NEPA document. MOHCD has the discretion, which can be determined on a project-by-project basis, to work outside the Part 58 checklist and consider topics relevant for the project. Each of the topics identified in the Draft EIR/EIS as not covered by NEPA has been reexamined in light of MOHCD’s discretion and the Draft EIR/EIS has been revised to incorporate into NEPA some of the previously “CEQA-only” impact topics. The table below lists each topic area that was not reviewed under NEPA in the Draft EIR/EIS. Impacts previously excluded from NEPA, but now included, are shown in gray. Topics remaining relevant to CEQA-only are shown in white, with an accompanying explanation. The text changes to the Draft EIR/EIS are shown following the table.

**Table 3-1 Impact Criteria Not Covered Under NEPA in the Draft EIR/EIS**

<b>Impact Number</b>	<b>CEQA Impact Statement</b>	<b>Response to comment requesting inclusion of this analysis under NEPA</b>
LU-1	The Proposed Project or its alternatives would not physically divide an established community. (Less than Significant)	Please refer to Section 5.5, <i>Socioeconomics and Community</i> , of the Draft EIR/EIS, for an analysis of socioeconomic effects related to physical barriers or isolation of a particular group.
CP-3	The Proposed Project or its alternatives could directly or indirectly destroy a unique paleontological resource or site or unique geological feature. (Less than Significant with Mitigation)	Impact CP-3 has been revised. Paleontological resources are addressed under NEPA, as well.
WS-1	The Proposed Project or its alternatives would not alter wind in a manner that substantially affects public areas. (Less than Significant)	Analyses of wind and shadow impacts are specific to state environmental review in certain communities. They are not a part of State of California standard CEQA checklist and not analyzed under NEPA.
WS-2	The Proposed Project or its alternatives would not result in new shadows in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)	
RE-2	The Proposed Project or its alternatives would include the construction of indoor and outdoor recreational facilities; however, construction would be temporary and would not have an adverse physical effects on the environment. (Less than Significant)	NEPA is concerned with the availability of recreational resources and their capacity to serve the Proposed Project. The availability of recreational resources is analyzed under Impact RE-1. NEPA does not separately analyze impacts from construction of one component of the entire project—in this case, recreational facilities—from the remainder of the analysis. Therefore, impacts from construction of recreational facilities are analyzed as part of the entire Project and included in the applicable Draft EIR/EIS sections, such as 5.9, <i>Noise</i> and 5.10, <i>Air Quality</i> .
UT-2	The Proposed Project or its alternatives would not require or its alternatives would not require or result in the construction of new water or wastewater treatment facilities or new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)	NEPA is concerned with the availability of utilities and service systems and their capacity to serve the Proposed Project. These effects are analyzed under Impact UT-1 (wastewater/stormwater) and UT-3 (water). NEPA does not separately analyze impacts from construction of one component of the entire project—in this case, water distribution and wastewater/stormwater collection facilities—from the remainder of the analysis. Any effects on the environment associated with construction of this infrastructure are identified in the relevant topic areas of this Draft EIR/EIS.
GE-4	The Proposed Project or its alternatives would not be located on expansive soil, as defined in Chapter 18 of the <i>California Building Code</i> , creating substantial risks to life or property. (Less than Significant)	This is a CEQA-specific criterion, using a definition that is applicable in the State of California. The analysis of geologic effects under NEPA is presented under Impacts GE-1 through GE-3.
GE-5	The Proposed Project or its alternatives would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)	Effects on septic tanks are addressed under NEPA, as well. Impact GE-5 has been revised.
GE-6	The Proposed Project or its alternatives would not substantially change the topography or any unique geologic or physical features of the Project site. (Less than Significant)	This impact topic is required under CEQA. However, topography also covered under impact criteria in other sections. For impacts to unique features or scenic resources, please see Section 5.3, <i>Visual Quality/Aesthetics</i> , Impact AE-4. Please also see Impact GE-2 and GE-3, which describes the earthwork activities that would affect the topography of the Project site.

**Table 3-1 Impact Criteria Not Covered Under NEPA in the Draft EIR/EIS**

<i>Impact Number</i>	<i>CEQA Impact Statement</i>	<i>Response to comment requesting inclusion of this analysis under NEPA</i>
HY-4	The Proposed Project or its alternatives would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality. (Less than Significant)	NEPA is concerned with the availability of utilities and service systems and their capacity to serve the Proposed Project. Please see Section 5.13, <i>Utilities and Service Systems</i> , Impact UT-2, for a NEPA analysis of stormwater capacity. Impact HY-1 provides the analysis of impacts to water quality from polluted runoff.
HY-6	The Proposed Project or its alternatives would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)	NEPA is concerned with the probability of local flooding. Therefore, these impact criteria are revised to be included in the NEPA analysis.
HZ-3	The Proposed Project or its alternatives could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant)	This specific question in the CEQA checklist derives from the California Education Code (Sec. 17213(b)) which states that, among other things, that a school site shall not be approved unless the school district consults with the applicable hazardous materials regulatory agency and local air district <b>“to identify both permitted and nonpermitted facilities within that district’s authority, including, but not limited to, freeways and other busy traffic corridors, large agricultural operations, and railyards, within one-fourth of a mile of the proposed school site, that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste.”</b> Therefore, it is a state-specific analysis not performed under NEPA. NEPA impacts related to hazardous materials release are analyzed under Impacts HZ-1, HZ-2, and HZ-4.
HZ-5	The Proposed Project or its alternatives would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Less than Significant)	The potential impairment of emergency response plans are not separately analyzed under NEPA. Instead, this effect is discussed, to some degree, in context of both transportation (congestion effects) and provision of emergency services (public services). Please see Sections 5.7 and 5.14 for an analysis of the NEPA effects associated with provision of emergency services.
ME-1	The Proposed Project or its alternatives would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. (No impact)	HUD does not require the analysis of impacts to mineral resources under NEPA, especially in an urban context where mineral resources and recovery sites are not present.
ME-2	The Proposed Project or its alternatives would not result in the loss of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. (No impact)	

## Section 5.7 – Paleontological Resources

Pages S-16 through S-18, Table S-1 of the Draft EIR/EIS have been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<b>Impacts/Effects</b>	<b>Proposed Project</b>	<b>Alternative 1: Reduced Development Alternative</b>	<b>Alternative 2: Housing Replacement Alternative</b>	<b>Alternative 3: No Project Alternative</b>	<b>Mitigation Measures</b>
Impact CP-3: Effects on Paleontological Resources					
CEQA: The Proposed Project or its alternatives could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	No Impact	Mitigation Measure M-CP-3a – Discovery of Paleontological Resources
<u>NEPA: This topic is not covered under NEPA. The Proposed Project or its alternatives could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Mitigation Measure M-CP-3a – Discovery of Paleontological Resources</u>
Impact C-CP-3: Cumulative Effects on Paleontological Resources					
CEQA: The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, could result in a significant cumulative impact related to paleontological resources.	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	Mitigation Measure M-CP-2a – Archaeological Resource Discovery
<u>NEPA: This is not a topic covered under NEPA. The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, could result in a significant cumulative impact related to paleontological resources.</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Mitigation Measure M-CP-2a – Archaeological Resource Discovery</u>



**Proposed Project**

The impact summaries on pages 5.6-16 through 5.6-18 have been revised as follows:

<b>Impact CP-3</b>	<p><b>Effects on Paleontological Resources</b></p> <p><b>CEQA: The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b></p>
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In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of the Proposed Project to paleontological resources to *less than significant with mitigation* under CEQA and NEPA because it would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for the Proposed Project is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from the Proposed Project would be *less than significant with mitigation* under CEQA and NEPA.

The impact analysis on page 5.6-21 has been revised as follows:

**Alternative 1 – Reduced Development Alternative**

<b>Impact CP-3</b>	<p><b>Effects on Paleontological Resources</b></p> <p><b>CEQA: The Reduced Development Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Reduced Development Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b></p>
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Alternative 1 would result in the same extent of ground disturbance as the Proposed Project. As described in Section 4.16, *Geology and Soils*, the rock unit underlying the Project site is serpentine. Fossils are not expected to be found in the rock or the soils on the Project site. In

the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of Alternative 1 on paleontological resources to *less than significant with mitigation* under CEQA and NEPA.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for the Proposed Project is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from Alternative 1 would be *less than significant with mitigation* under CEQA and NEPA.

The impact analysis on pages 5.6-24 through 5.6-24 has been revised as follows:

**Alternative 2 – Housing Replacement Alternative**

<b>Impact CP-3</b>	<b>Effects on Paleontological Resources</b>
	<b>CEQA: The Housing Replacement Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b>
	<b><u>NEPA: This topic is not covered under NEPA. The Housing Replacement Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b>

Alternative 2 would result in less ground disturbance than the Proposed Project, but the majority of the site would still be affected. As described in Section 4.16, *Geology and Soils*, the rock unit underlying the Project site is serpentine. Fossils are not expected to be found in the rock or the soils on the Project site. In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of Alternative 2 to paleontological resources to *less than significant with mitigation* under CEQA and NEPA because it would not directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for Alternative 2 is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from Alternative 2 would be *less-than-significant with mitigation* under CEQA and NEPA.

The impact analysis on pages 5.6-28 through 5.6-29 has been revised as follows:

### **Cumulative Impacts**

<p><b>Impact C-CP-3</b></p>	<p><b>Cumulative Effects on Paleontological Resources</b></p> <p><b>CEQA: The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to paleontological resources. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This is not a topic covered under NEPA. The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to paleontological resources. (Less than Significant with Mitigation)</u></b></p>
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Several sections of the California State PRC protect paleontological resources. Section 5097.5 of the PRC prohibits “knowing and willful” excavation, removal, destruction, injury, and defacement of any paleontological feature on public lands (lands under state, county, city, district, or public authority jurisdiction, or the jurisdiction of a public corporation), except where the agency with jurisdiction has granted permission. Through compliance with the PRC, overall cumulative impacts are considered less than significant. As described in Impact CP-3, above, the Proposed Project would not result in an adverse impact on paleontological resources. Further, adherence to Mitigation Measure M-CP-3a would ensure that in the event that paleontological resources are discovered during construction of the Proposed Project, all necessary steps would be taken to limit impacts on such resources. Therefore, the Proposed Project would not make a significant cumulative contribution to potential impacts on paleontological resources. The Proposed Project and its alternatives and all of the cumulative projects listed in Section 5.1 have been or would be required to adhere to State laws concerning the protection and appropriate treatment of paleontological resources. As such, under CEQA and NEPA, the contribution of the Proposed Project and its alternatives to cumulative effects on paleontological resources would be *less than significant with mitigation*. The Proposed Project and its alternatives’ incremental contribution to these cumulative effects would not be cumulatively considerable.

## ■ Section 5.16 – Geology and Soils

Page S-16, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<b>Impacts/Effects</b>	<b>Proposed Project</b>	<b>Alternative 1: Reduced Development Alternative</b>	<b>Alternative 2: Housing Replacement Alternative</b>	<b>Alternative 3: No Project Alternative</b>	<b>Mitigation Measures</b>
Impact GE 5: Effects on Septic Tanks					
CEQA: The Proposed Project or its alternatives would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No Impact	No Impact	No Impact	No Impact	n/a
NEPA: <u>This topic is not separately covered under NEPA. The Proposed Project or its alternatives would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	n/a

The impact summary on page 5.16-12 has been revised as follows:

### **Proposed Project**

<p><b>Impact GE-5</b></p>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA: The Proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</u></b></p>
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The impact summary on page 5.16-15 has been revised as follows:

***Alternative 1 – Reduced Development Alternative***

<b>Impact GE-5</b>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA:</b> The Reduced Development Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Reduced Development Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</u></p>
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The impact summary on page 5.16-18 has been revised as follows:

***Alternative 2 – Housing Replacement Alternative***

<b>Impact GE-5</b>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA:</b> The Housing Replacement Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Housing Replacement Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</u></p>
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## ■ Section 5.17 – Hydrology and Water Quality

Page S-58, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<b>Impacts/Effects</b>	<b>Proposed Project</b>	<b>Alternative 1: Reduced Development Alternative</b>	<b>Alternative 2: Housing Replacement Alternative</b>	<b>Alternative 3: No Project Alternative</b>	<b>Mitigation Measures</b>
Impact HY-6: Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure					
CEQA: The Proposed Project or its alternatives would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam.	No Impact	No Impact	No Impact	No Impact	n/a
<del>NEPA: This topic is not covered under NEPA. The Proposed Project or its alternatives would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam.</del>	<del>n/a-No Impact</del>	<del>n/a-No Impact</del>	<del>n/a-No Impact</del>	<del>n/a-No Impact</del>	<del>n/a</del>

The impact analysis on pages 5.17-15 through 5.17-16 has been revised as follows:

### **Proposed Project**

<p><b>Impact HY-6</b></p>	<p><b>Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure</b></p> <p><b>CEQA: The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</b></p> <p><b><del>NEPA: This topic is not covered under NEPA. The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</del></b></p>
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As discussed in Section 4.17, *Hydrology and Water Quality*, the Project site is not susceptible to seiche or tsunami due to its inland location (approximately 1 mile from the San Francisco Bay)

and elevation of approximately 40 to 265 feet above mean sea level. The Project site is not within a dam failure inundation area, and there are no levees near the Project site. Mudflows typically occur on steep slopes where vegetation is not sufficient to prevent rapid erosion; most commonly in arid and semiarid regions. The Project site is located on the south slope of Potrero Hill, downslope from the Potrero Hill Recreation Center. The south slope of Potrero Hill is landscaped, vegetated, or developed. Therefore, mudflow would not pose a risk to the site because the physical conditions required for a mudflow are not present. Therefore, under CEQA and NEPA, *no impact* would occur.

The impact summary on page 5.17-18 has been revised as follows:

***Alternative 1 – Reduced Development Alternative***

<b>Impact HY-6</b>	<p><b>Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure</b></p> <p><b>CEQA:</b> The Reduced Development Alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Reduced Development Alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</u></p>
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The impact summary on page 5.17-20 has been revised as follows:

***Alternative 2 – Housing Replacement Alternative***

<b>Impact HY-6</b>	<p><b>Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure</b></p> <p><b>CEQA:</b> The Housing Replacement Alternative (Alternative 2) would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Housing Replacement Alternative (Alternative 2) would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</u></p>
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## 3.19 GENERAL COMMENTS AND SCOPE OF THE DRAFT EIR/EIS

The comments and corresponding responses in this section cover general topics related to the Draft EIR/EIS and project. These include topics related to:

- GC-1: Non-CEQA/NEPA
- GC-2: Not Pertaining to Adequacy of EIR
- GC-3: Amenities, Appliances, and Street Naming
- GC-4: Speculative Comments
- GC-5: Adequacy of the Draft EIR/EIS
- GC-6: Praise of Document
- GC-7: Text Changes

### Overview of General Comments

The comments and corresponding responses in this section cover general subjects not directly related to a specific section of the EIR, although in some cases they address a number of interrelated topics discussed in various sections of the Draft EIR/EIS.

### Comment GC-1: Comments that are non-CEQA/NEPA related

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-U.S. DOI	I-Fay (1)	I-Robbins
A-U.S. EPA	I-Fenili E	I-Sabre & Loura (1)
A-Caltrans	I-Fenili F	I-Sabre & Loura (2)
A-CA SCH	I-Glober	I-Schurnghammer
A-BAAQMD	I-Gudmundsson (1)	I-Serwer and Dreschler (1)
A-SFPUC	I-Gudmundsson (2)	I-Serwer and Dreschler (2)
I-Abel (1)	I-Hunting	I-Shaw (1)
I-Abel (2)	I-Kwan	I-Shaw (2)
I-Aragón	I-Lee H	I-Wang
I-Bergeron	I-Lee R (1)	I-Zen
I-Boss	I-Lee R (2)	I-Zhang
I-Brown	I-Marini	O-Bridge Housing
I-Cameron	I-Meroz	O-Potrero Boosters
I-Carpinelli	I-Montalto (1)	O-Rebuild Potrero
I-Christiansen	I-Montalto (2)	A-Commissioner Johnson
I-Costamagna	I-O'Rourke	A-Commissioner Wu
I-Dhillon	I-Reid	



“The Department of the Interior has received and reviewed the subject document and has no comments to offer. Thank you for the opportunity to review this project.” (*United States Department of the Interior, letter, January 7, 2015 [A-U.S. DOI]*)

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“The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed. (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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EPA appreciates the opportunity to review this DEIR/DEIS. When the Final EIR/EIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.” (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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“The Project proposes to demolish 620 public housing units and develop housing for up to 1,700 new units on the project site, located in Potrero Hill, to revitalize the distressed Potrero Housing Development and add additional affordable housing options in the City of San Francisco. The Proposed Project would include new vehicle and pedestrian connections, a new street and block layout, new transit stops, and new water, wastewater, and storm water infrastructure. In addition, the Proposed Project would incorporate green construction and sustainable principles, retail, community facilities, and open space. The Proposed Project would be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED ND) standards.

Based on our review, we have rated the Proposed Project as Lack of Objections (LO) (see enclosed “Summary of Rating Definitions”). While we do not object to the Proposed Project, we have some recommendations, for your consideration, for improving the mitigation and disclosure of impacts in the Final EIR/EIS.” (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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“SUMMARY OF EPA RATING DEFINITIONS<sup>22</sup>: This rating system was developed as a means to summarize EPA’s level of concern with a proposed action. The ratings are a combination of

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<sup>22</sup> From EPA Manual 1640, “Policy and Procedures for the Review of Federal Actions Impacting the Environment.”

alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

#### ENVIRONMENTAL IMPACT OF THE ACTION

*“LO” (Lack of Objections):* The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

*“EC” (Environmental Concerns):* The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

*“EO” (Environmental Objections):* The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

*“EV” (Environmentally Unsatisfactory):* The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

#### ADEQUACY OF THE IMPACT STATEMENT

*“Category 1” (Adequate):* EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

*“Category 2” (Insufficient Information):* The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

*“Category 3” (Inadequate):* EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which

should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ." (*United States Environmental Protection Agency, letter, January 5, 2015 [A-U.S. EPA]*)

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"Thank you for including the California Department of Transportation (Caltrans) in the review of the EIR/EIS for the project referenced above. We have reviewed the document and have the following comments." (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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"Should you have any questions on this letter, please contact Sergio Ruiz at (510) 622-5773 or sergio.ruiz@dot.ca.gov." (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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"The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 7, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the

environmental review process.” (*State of California State Clearinghouse and Planning Unit, letter, January 8, 2015 [A-CA SCH]*)

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“Bay Area Air Quality Management District (Air District) staff has reviewed your agency’s Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIR) prepared for the Potrero HOPE SF Master Plan Project (Project). The Project is located in the southeastern area of the Potrero Hill neighborhood bounded by Interstate 280 on the west, U.S. Highway IOI on the east, and Cesar Chavez Street to the north. The Project site comprises several parcels totaling approximately 39 acres.

The Project would replace current uses with approximately 1,700 residential units, up to 15,000 square feet of ground-Floor, neighborhood-serving retail or flex space, a community center, public and private open space, a daycare and preschool facilities. Approximately 600 of the residential units would be affordable housing and the remaining 1,080 units would include a mix of affordable and market rate housing.” (*Bay Area Air Quality Management District, letter, January 7, 2015 [A-BAAQMD]*)

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“Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.” (*Bay Area Air Quality Management District, letter, January 7, 2015 [A-BAAQMD 2]*)

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“Thank you for the opportunity to review and comment on the Draft Environmental Impact Report/Environmental Impact Statement for the Potrero HOPE SF Master Plan Project. Staff of the San Francisco Public Utilities Commission (SFPUC) offer the following comments.” (*San Francisco Water, letter, January 6, 2015 [A-SFPUC]*)

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“Thank you for allowing me to comment on the Draft EIR/EIS for Potrero HOPE project. I live in the bordering block most affected by the rebuilt, on Wisconsin St. between 25th and 26th. It is most affected because not only does it border the project, but it has the largest amount of through traffic, including buses. We already deal with noise, congestion, pollution, and, of course, a tremendous amount of car break-ins.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“First, let me say that I am in favor of the current buildings being torn down and replaced by mixed economic housing. I do believe this will cut down on car break-ins on my street.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“What is the compensation for living with this massive rebuild, losing my view, and then living with close to a 3 fold increase in density, buildings, cars, buses, noise, etc.? Keep in mind that not all the units are occupied right now, so the difference between the number of units occupied at present and the number that will be occupied when the project is complete is more than 3 fold.” (*Lee Abel, letter, January 4, 2015, [I-Abel (1)]*)

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“Hi, I’m Lee Abel. I live on Wisconsin Street between 25th and 26th Street. And I think that my street is probably one of two streets that are the most impacted with the rebuilt.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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“First off, though, I would like to say that I am for a rebuild, I am no way against a rebuild; however, I do have some serious concerns. On my street right now I can only have one person at a time visit me because if they park across the street they probably have about a 50/50 chance of their car being broken into. So this is going to be great that we’re going to have some eyes on the street over there.” (*Lee Abel, Public Hearing, December 11, 2014 [I-Abel (2)]*)

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“My name is Maritza Aragon. I’m a resident of Potrero Hill. I’m participating in the activities that are carried out there. I feel better now, but sometimes I feel very stressed because of violent activity in that area. My children are very afraid. We are hoping for a better -- we’re hoping for changes in the new homes – housing that will be built. We’re hoping there will be no more violence, that things will be different. That’s all.” (*Maritza Aragón, Public Hearing, December 11, 2014 [I-Aragón]*)

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“Hi there. I’m Bonnie Bergeron. I live at 1504 25th Street and I have lived there for about 27 years. I’ve seen lots of changes on the hill. I am totally in support of this project. I’ve really participated in it in the first couple of years. It’s been wonderful to see the community-building and to feel the vibrancy of the area and watch people take ownership and watch crossover between Potrero Hill and the Terrace and the Annex because they are all so separated. And so it’s been really great to see all of that opening up.” (*Bonnie Bergeron, Public Hearing, December 11, 2014 [I-Bergeron]*)

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“And I do support the project. Thank you very much.” (*Bonnie Bergeron, Public Hearing, December 11, 2014 [I-Bergeron]*)

“Good afternoon, Commissioners. My name is Joe Boss and I live in Dogpatch and have for 32 years and have always been frustrated with the city’s inability to deal with the Potrero Annex and Terrace. It’s been skipped over a couple of times and we’re finally at a point where it actually has a good development community. And the outreach has been absolutely the best I have ever seen. And I mean that. And probably 20, 25 years ago I worked with some people who were tenants of the Annex and Terrace and we did a cleanup that the housing authority was unable to and I guess there were probably about 25 people who showed up. They were either mothers of tenants or white people who lived down the hill. What can I say? It’s reality.

We have worked so hard to bring this project to this point and the EIR and EIS has been painstakingly, rigorously followed. Yes, there are always the problem of, “Oh, we’re going to have an influx of people.” I live in Dogpatch. I mean, Central Waterfront, Pier 70, et cetera. And all the projects that are going on there, this will certainly augment what’s going on at the Annex and Terrace for those people who live there. And it also expands quite a bit the market-rate housing that really goes a long way to making it a mixed community. I can’t say enough about Emily and her work. I’ve seen a lot of projects falter when it comes to community involvement and this one certainly hasn’t. As far as, like I say, the EIR/EIS I think has been exhaustively gone over. The comments originally certainly did slow the process down, as answers were made to the questions raised. I heartily support this EIR/EIS and I hope you guys will concur. Thank you very much.” (*Joe Boss, Public Hearing, December 11, 2014 [I-Boss]*)

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“My name is Niesha Brown; I am a resident in the Potrero Hill Terrace housing developments.” (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

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“I want to support the Rebuild Potrero project, under certain conditions. Even though I do not agree on some things about the development and the process, my heart says, “Change is good.” The living conditions for some families in the community are upsetting for me to see, the new development will bring joy and happiness and a positive outcome to all in the community, not just for the individuals in the Projects, but for homeowners as well.” (*Niesha Brown, letter, January 7, 2015 [I-Brown]*)

“Wasted Opportunity: The unique topography and vistas of this property make it a site worthy of a design competition. I strongly urge the City and County of San Francisco to send Hope SF back to the

drawing board and foster a global design competition.” (*Reynolds Cameron, email, January 7, 2015 [I-Cameron]*)

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“Good afternoon, Commissioners, my name is Janet Carpinelli. I am also a 30- plus-year resident of Potrero. I live in Dogpatch. I’m a member of the Potrero Boosters. And from where I am, we look up the hill to this project, the Potrero Annex and Terrace. We’ve been looking forward to seeing the remodel for years and years and years. And I would also like to concur with the last two speakers in that the group that’s doing this project now, Bridge Housing Rebuild, has done a fantastic job of keeping the community involved and bringing very different people together.

There have been many, many, many postcards, ads, articles in the Potrero View. They’ve been to the Potrero Festival for years. They do everything they can to be out there in the public and bring people together. I’ve been up to many get-togethers and working workshops, et cetera, et cetera, and I really think that this project should go through and that it’s been studied and it’s got a lot of comments from people in the neighborhood.

I think the idea that there’s going to be a new and extended street grid system so there’ll be more transportation in and out, more ways to get in and out, and more ways to bring people around the hill is a plus. In general, I would like to say -- this is really for the city, rather than the project, is that we must have more and better public mass transit all over the city, and particularly Potrero Hill/Central Waterfront. So as far as the project goes, I’m very much in favor of it and I’m looking forward to seeing it move ahead. Thank you.” (*Janet Carpinelli, Public Hearing, December 11, 2014 [I-Carpinelli]*)

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“Hi. Good afternoon. My name is Kim Christiansen and I am also a resident of Potrero Hill, and I am enthusiastically in favor of this project and I hope we can get it going and start building right away because it has amazing potential for all the residents of Potrero Hill. I’ve had the opportunity to work with Bridge Housing and SF Hope, the Mayor’s Office on the Community Advisory Group this last two years, and we were working on the people plan, which is the kind of companion piece to the rebuilding component focusing in on, like, a community-in-need assessment and looking at opportunities to raise the quality of life and really embrace the residents of the neighborhood so that they are going to have solid, you know, improvements and investments in the community from a social aspect as well. And that’s really critical.

I had a chance to get to know some neighbors through this community-building process and see folks that are living in the Terrace and Annex housing programs, have jobs in the planning process or work on the urban farm, and I’ve really seen my neighbors blossom, just having these opportunities, having mentoring, leadership training, and paid jobs. It’s just changed lives.

So I'd just like see to this be expanded and through the construction process and continued community building work that Bridges is doing has so much great potential for our neighborhood. So thank you very much." (Kim Christiansen, *Public Hearing, December 11, 2014 [I-Christiansen]*)

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"I am a homeowner and resident of Potrero Hill. I can actually see the public housing from my window. I wholeheartedly support the rebuilding. It cannot happen fast enough. This will unify and improve our neighborhood. There is a small, vocal group of opponents who do not represent what most of the residents of the area want. Please continue to push for the redevelopment." (*Matt Costamagna, email, December 28, 2014 [I-Costamagna]*)

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"I am a nonprofit consultant and work at the Potrero Annex and Terraces (PTA) where I created a program called Healthy Generations Project (HGP). HGP works with children and families at PTA to help manage the negative effects of toxic stress on children who are growing up in the neighborhood in poverty and an atmosphere of high crime and violence. The impacts of stress on children in these circumstances has been the focus of a growing field of research that links toxic stress to long term negative health impacts to children's cognitive, emotional and physical health." (*Jennifer Dhillon, letter, January 6, 2015 [I-Dhillon]*)

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"I strongly support the Rebuild Potrero Plan. Currently, the dilapidated apartments and the unsafe pedestrian environment create conditions that are detrimental to children's health. The lack of mixed income, and mixed use in the area means the PTA residents live in a food desert and lack access to simple amenities such as laundromats, gathering places, and safe places to play." (*Jennifer Dhillon, letter, January 6, 2015 [I-Dhillon]*)

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"Please approve this project. It is necessary and long overdue for the residents of this forgotten portion of Potrero Hill." (*Jennifer Dhillon, letter, January 6, 2015 [I-Dhillon]*)

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"The undersigned represent a group of homeowners in and around the Parkview Heights development on Potrero Hill. As residents in an area that will be significantly impacted from the proposed Rebuild Potrero development, we share a desire for its positive effect on our community and long-term success. We appreciate this opportunity to share our concerns and comments about the project, which are summarized below": (*Jane Fay, letter, December 3, 2014 [I-Fay (1)]*)



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“Thank you again for allowing us the opportunity to address our concerns during this comment period. Please feel free to contact us at. ...: “(Jane Fay, letter, December 3, 2014 [I-Fay (1)])

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“I am a relatively new home owner in Potrero Hill but am a born and raised San Francisco resident and my father has run a business in Potrero Hill for the past 30 years.” (Eduardo Fenili, email, January 5, 2015 [I-Fenili E])

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“I am excited at the prospect of revitalizing the Annex and Terrace areas and hope that it is a welcome change for the entire neighborhood ... above all those currently residing there.” (Eduardo Fenili, email, January 5, 2015 [I-Fenili E])

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“My name is Francesca and I live at Arkansas and 20th in Potrero Hill. My brother and I recently purchased a three-unit building in the neighborhood and are very excited to watch the area grow.

We are both San Francisco natives, growing up in the Outer Mission (where our parents still live) and my father has long been a small business owner in Potrero Hill. Given the weather, neighborhood feel and location, it was the perfect area for us when considering where to buy in the city.” (Francesca Fenili, email, January 7, 2015 [I-Fenili F])

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“I think Potrero Terrace and Potrero Annex Public Housing will help improve the safety and overall value of my home and encourage more investment in the area.” (Francesca Fenili, email, January 7, 2015 [I-Fenili F])

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“Background information outline on me so you can “consider the source” of comments below:

- ✓ Resident of Potrero Hill since July 1995 (19 years).
- ✓ Once held a job reviewing and contributing to edits of Environmental Impact Reports.
- ✓ Have served on Boards of Directors / Executive Committees for the Potrero Boosters Neighborhood Association (neighborhood based land use community group, appointed), and

Starr King Open Space (privately held 4 acre hilltop open space directly across the street from the Potrero Terrace and Annex, elected by members of local community).

- ✓ Participant for well over a year in focus group meetings of BRIDGE with residents of Potrero Terrace and Annex and residents of the surrounding Potrero Hill neighborhood.
- ✓ Participant in Potrero Terrace and Annex I Potrero Hill planning meetings, general community meetings and nutrition classes for well over a year after that.
- ✓ Background in both civil rights and environmental issues.
- ✓ Currently researching innovations in “green architecture” for real estate developers building in Potrero Hill / Dogpatch / SOMA
- ✓ First garden manager for BRIDGE I Rebuild in Potrero Terrace and Annex in the “Family Resource Center Garden”, a precursor to, and now a part of, the “Texas Street Farm”.
- ✓ Participated entirely as a volunteer before being appointed to the part time garden manager position. Did not anticipate being hired in any way during 15 months of focus group meetings prior to that appointment; my impressions of BRIDGE / Rebuild pre-date any expectation of being paid, and were reinforced during my period of employment.” (*David Globber, letter, December 30, 2014 [I-Globber]*)

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“When I first moved to Potrero Hill, I was quickly amazed by the extent of apartheid-like experience. I am usually a bit extraverted, and if I tried to say “hi” to any one from public housing, I usually got back a shy or cautious response at best. Having lived for four years in the northern part of Sausalito previously, immediately uphill from and adjacent to Marin City, the separation and demarcation felt even more pronounced on Potrero Hill.

During the very well attended neighborhood meetings and subsequent focus group breakout sessions in which BRIDGE / Rebuild announced its intentions and community members met to discuss existing conditions and possible improvements, I was very moved to finally meet the residents in public housing at the top of “The Hill” (as we sometimes reference the whole neighborhood) and learn about problems with lighting at the top of stairways, etc. and most of all just finally have social contact with these folks who are more my neighbors than anyone living in the Mission District or Bernal Hill. The way these focus groups and subsequent community gatherings were managed by BRIDGE / Rebuild showed some real compassion and indicated more than just lip service regarding hoped-for future outcomes. Without BRIDGE / Rebuild I would probably still experience deep separation; now I have friends and acquaintances inside the Terrace and Annex.

When I started working on the garden, I was nevertheless apprehensive. Would I get caught in some crossfire? Would people misunderstand my purpose? Would I be harassed? Would my car be broken into? For the first few months I always carried a garden hose slung around my shoulder so they would have some sense of my intentions of being there.

But what I discovered was in some ways a tighter knit and more family based community in the Terrace and Annex than in the more economically privileged larger neighborhood. Many of them still have ties to the South from their arrival during World War II to work in shipbuilding for the Navy, and I learned to say "Miss Maggie" not just Maggie, and so on, in honor of the continuation of the sense of respect for elders and generally family connections that at first surprised me.

I learned about how African Americans were not given access to home loans and were largely left behind in what became an urban ghetto that had, during the War, been a community of mixed backgrounds. I learned how at one point, decades ago, there was an offer to rebuild the worn down housing but the residents were concerned that they would be displaced and not allowed back. I gradually became more comfortable until I remember one Sunday night still gardening after sunset as a resident called down to me from her home how lovely the new flowers were I had just planted.

These folks need and deserve what BRIDGE / Rebuild can provide. Much improved housing. Safe lighting at night. Streets that are connected to the rest of the neighborhood - an end to the apartheid. Access to fresh, healthy groceries that are more about nourishing food than potato chips and alcohol, and don't require two buses and a long wait in between both to get to Safeway and back. And the kinds of exercise and nutrition programs that BRIDGE / Rebuild have already put in place for quite some time, in particular under the leadership of Emily Weinstein. Emily is especially dynamic, committed, vigorous, and someone who has built a reputation for walking the talk and getting things done. And BRIDGE I Rebuild has encouraged and promoted leadership and skill building among residents, such as Allie Ferrey as a teenager and the irrepressible Uzuri Pease-Green. The movie nights, the community walks that members of the entire neighborhood enjoy and love - the steps have already long been in place to build community and not just housing.

Will there be adjustments, and has it already sometimes been bumpy or confusing? Of course. I like to think that I may have contributed a few times along the way to increased communication, trust, candor, clarity, good planning, etc. as a community member and during my time as garden manager.

And the three income tiers can be a bit confusing at first also. Is this a conspiracy to just bring rich people into hilltop views? As a land use activist, this was my first concern, and I didn't surrender it lightly. But I also understand that, with the Eastern Neighborhoods Plan that focused attention on rezoning post-industrial lands, the ever-expanding pressure to bring in new population, the real estate and economic boom that is at the center of life in San Francisco at present, and also the need to cover the very long term design and development costs of overhauling so much land, housing and community infrastructure, that there is a need for high and middle income to be present along with subsidized income. But then I realized that in fact this is a model that many of us have tried so very

hard to make more the norm in all the new housing development that is taking place neighborhood wide and citywide. That BRIDGE / Rebuild has the potential at least to put together true socioeconomic diversity and “show how it’s done”.

I also recall an interesting moment in which some members of Potrero Hill “suddenly” found out about BRIDGE I Rebuild in Potrero Terrace and Annex and protested passionately that they had been somehow left out. A proprietor of a hairdressing salon, for example, decided that if he did not know that this was happening, then the perception was that the word had not just gotten out. However, this was after the more than a year of focus groups, postings on telephone poles, and articles in the Potrero View. After much anger and discussion, people who had felt they were not properly informed, began to be brought into the overall conversation. Had there perhaps been missteps in the outreach at this point? I honestly can’t say for sure. No matter what takes place in a community, it seems that until some people really get it that this is going to affect them personally in some direct or indirect way, they may not realize it’s actually happening.

Whether their attention had “fallen through the cracks” or outreach had missed some key spots or key people, again I’m not sure, but I can say that BRIDGE / Rebuild very actively made sure to include everyone who had felt left out, into the process, into community meetings, and made a point to address all questions as quickly and thoroughly as possible. I haven’t been around quite as often in recent months, so I don’t know if such disconnects and reconnects have happened since, but I do understand that the intentions of BRIDGE I Rebuild are community-building and inclusive.

There were also some moments between BRIDGE / Rebuild and the leadership of the Family Resource Center that were a bit awkward for a while, but having been very close to all of that when managing the garden, I think at least some of that may have been a legacy of years of disenfranchisement, and I hope understandings and sharing of management practices have improved.

Additionally, the infrastructure and the extremely professional landscape architecture design on the exceptionally steep hillsides have been stellar at least in planning and early project management. The community meetings have been very consistent. The health and nutrition programs have been very steady, and the excitement of participants in Zumba and other programs have really been noticeable.

I think overall this is a program of social connection, upward mobility, dignity and economic empowerment, and urge you to endorse it moving forward.” (*David Glober, letter, December 30, 2014 [I-Glober]*)

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“5. Can the Parkview Heights community really do anything to prevent high density “mini projects” from being created, and possibly placed at its doorsteps?”

- o (Note: the author of this letter is not on the board for the association, all board actions proposed are speculative). With a 200+ unit strong HOA, Parkview Heights has the financial resources to hire strong legal help. The Parkview Heights community could pursue various legal motions and stays to make sure that its rights & well-being, and the rights & well-being of the low-income residents, are not compromised by condensing the low-income units into high-density “mini projects”, and placed at Parkview Heights’ doorsteps.”(*Dadi Gudmundsson, letter, December 15, 2015 [I-Gudmundsson (1)]*)

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“My name is Dadi Gudmundsson. For the spelling you’re going to have to see the card. It’s hard.

And I live in 27 Blair Terrace, San Francisco. That’s literally a few yards away from the site that we’re talking about.

And for brevity, I will omit various appreciation for many well-done parts of the EIR and move on to my grievances.” (*Dadi Gudmundsson, Public Hearing, December 11, 2014 [I-Gudmundsson (2)]*)

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“Good afternoon, my name is Patricia Hunting. I am a resident of 1512 25th Street. I’m a neighbor of the SF Hope reconstruction site. While I’m very much in favor of seeing an improvement to the south end of our neighborhood,” (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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“I think the things that Hope SF is planning -- the things that they’re planning are very well designed. I’ve seen great improvement with the people that live in the projects right now and I would really like to see those people have a better place to live in the future, and I would like to see, like the rest have stated, more safety in our neighborhood. Those are all my comments. Thank you very much.” (*Patricia Hunting, Public Hearing, December 11, 2014 [I-Hunting]*)

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“Good afternoon. I reside in this area. According to the information I got, currently there are 606 living units in our area, and according to the plan, there can be 1,600 units to be constructed. And also would like to feed back that our mayor has 30,000 units planned in the future, so just want -- I think this is a great plan. And then, using existing space to construct, to build this many units, can only bring good things to the neighborhood and area and no bad things. And all these constructions and renewal will improve the area and bring, yeah, new elements, and it will bri- -- and the real estate will appreciate. And I absolutely agree this proposal, this plan of constructing 1,600 units in this area.” (*Mr. Kwan, Public Hearing, December 11, 2014 [I-Kwan]*)

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"Thanks for your attention to this matter. I hope to hear back from you. Please do not hesitate to contact me if you have any questions or comments." (*Homer Lee, letter, January 4, 2015 [I-Lee H]*)

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"I'd like to provide some feedback on the Draft EIR for the Rebuild Potrero project. I have noted from the Draft EIR the following troubling issues:" (*Richard Lee, email, January 5, 2015 [I-Lee R (1)]*)

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"Hello. My name is Richard Lee and I live at 1099 Mississippi Street, very close to the rebuild area. I'd like to voice my support of the project. I think it will be an excellent use of the currently low-density buildings to increase the density of that area. I think bringing additional people into that area will be a good thing." (*Richard Lee, Public Hearing, December 11, 2014 [I-Lee R (2)]*)

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"This is written in response to the above-referenced EIR. As a 30 year resident of Potrero Hill, I am saddened to view the details of the EIR related to this site.

I respectfully request the City to reconsider approval of the project in light of the following concerns, and remand the plans back to the developer for major revision." (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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"Please do not approve the plan until these serious issues are addressed. Though I have tried to engage with the project managers and legislators throughout the development of this project, my concerns, as well as those of numerous neighbors, have been disregarded thus far." (*Linda D. Marini, letter, January 7, 2015 [I-Marini]*)

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"I support the rebuilding of the Potrero Terrace affordable housing projects so as to provide healthier, safer and more comfortable living conditions to its present and future residents." (*Yoram Meroz, email, January 7, 2015 [I-Meroz]*)

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“Like most of Potrero Hill residents I look forward to changes to Potrero Terrace and Annex. I’ve attended numerous meetings sponsored by Bridge Housing Corp. and from the start of this project I was opposed to the massive scope of this project.” (*Dennis Montalto, letter, January 4, 2015 [I-Montalto (1)]*)

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“Good afternoon, my name’s Dennis Montalto and my wife’s Bonnie Bergeron. We’ve been residents of 25th Street -- we’re at 1504 --for about 30 years, so we’ve seen a lot of changes come into that area.” (*Dennis Montalto, Public Hearing, December 11, 2014 [I-Montalto (2)]*)

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“Thank you for the opportunity to submit comments on this report.

I am a resident of Potrero Hill since 1991 and my home is located on 23rd St., which borders the proposed development. My concerns are as follows;”(*Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke]*)

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“9. If now is the time that the new street to be created between 24th St. and 25th St. is named, then I hope someone can come up with a more imaginative name than 24 1/2 Street. Perhaps a name in honor of an important historical figure from the neighborhood.” (*Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke]*)

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“Thank you for taking the time and consideration to review my comments. If you have any questions, you may reach me at 415-797-8505.” (*Kevin O’Rourke, letter, January 6, 2015 [I-O’Rourke]*)

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“The proposed master plan design would improve residential density, neighborhood connectivity, walkability, green and open space, social and economic integration, and aesthetic cohesiveness with the surrounding urban context over the original 1941 design. San Francisco needs this kind of high-quality public housing.” (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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“Thank you for the opportunity to review and comment upon the Draft EIR/EIS for the Potrero Terrace and Potrero Annex public housing redevelopment proposal. As a former resident of San Francisco’s

Mission District, I appreciate the project applicant's concern over the City's severe shortage of housing stock that is affordable to low-income residents, as well as the need to upgrade the housing options that are available to those in need of public assistance. As a student of architecture, urban design, and urban planning, I also appreciate the obvious diligence and care that went into the development of the proposal." (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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"Conclusions: I would very much like to be notified of the lead agency's responses to my critiques, as well as the future status of the Potrero HOPE SF Master Plan as it moves through the planning and development process. Thank you again for the opportunity to comment on this document." (*Daniel Reid, letter, December 21, 2014 [I-Reid]*)

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"Thank you in advance for investigating these points and working with me and other members of the community to ensure the best possible future for San Francisco and its residents." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"Thank you for your attention. Please do not hesitate to contact me with comments or questions at Nathaniel.Robbins@ucsf.edu. I will look forward to your response and reconsideration of the Proposed Project as it currently stands." (*Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins]*)

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"As longtime neighbors, we attended early meetings that proposed 1200 units to replace existing 650 units. Later, developers proposed 1,700 units and then said that they would reduce the number to 1600. Such tactics are disingenuous and deceitful." (*Christopher Sabre and Jean Loura, email and letter, January 5, 2015 [I-Sabre & Loura (1 and 2)]*)

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"I have been a resident of Potrero Terrace for over 30 years. I know HUD wants to redevelop all of the southeastern sector of public housing in San Francisco and have a few questions." (*Marlene Schurnghammer, letter, undated [I-Schurnghammer]*)

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"As a homeowner, from the Parkview Heights development, on Potrero Hill adjacent to the proposed rebuild I strongly desire a successful outcome. This is a once in a lifetime opportunity for all of Potrero



Hill and San Francisco to gain a thoughtfully well - designed, sunny, vibrant, model neighborhood.” (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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“I participated in many of the design workshops with many other people, and I am truly impressed by the work the Potrero Hill community achieved to get this far in the process. With a little more thought and action on the demographic composition and an increased proportion of ownership of the project units, I believe the potential for this new community to be exceptionally positive for all.” (*Jennifer Serwer and Thomas Dreschler, letters, December 3, 2014 [I-Serwer and Dreschler (1) and (2)]*)

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“I am attempting to contact you. I called the above phone number and had to wait on a call back. I have no message phone to leave an answer to at this time. Therefore I am writing you this letter.

My anticipation to communicate with you concerns the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for the Potrero Hope S.F. Master Plan Project. There was a Public Notice issued for December 11, 2014. Public Hearing on the adequacy and accuracy of this document. The Public Notice mentioned that if you wanted more information contact Rachel Schuett.

Therefore I would like to be placed on your mailing list pertaining to this document (EIR/EIS). I would like to receive more NOTICES concerning it. Most important I would like to receive a document titled “Response to Comments” which will contain all relevant comments on the Draft (EIR/EIS) that took place at the hearing.

These comments come out at the Public Hearing on December 11, 2014. I went to testify at the Public Hearing, and did do so. The document the Draft (EIR/EIS) said that those who testify at the Hearing on the Draft (EIR/EIS) will automatically receive a copy of “Responses to Comments” document. Along with it they would receive the date reserved for certification of the Draft (EIR/EIS).

Thus I would like to receive more Notices and the document “Responses to Comments”.” (*Thomas Shaw, letter, December 27, 2014 [I-Shaw (1)]*)

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“Good afternoon, my name is Thomas Shaw. And I think it’s commendable that you’re attempting to modernize Potrero Hill, but I wasn’t served when the services came out, when they carried out the scoping, and I actually own Potrero Hill.” (*Thomas Shaw, Public Hearing, December 11, 2014 [I-Shaw (2)]*)

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“So I don’t -- I support Alternative 3. I don’t want any changes to take place in Potrero Hill. The problem was in the zoning. They zoned it for public housing and it’s really private property. So I

wanted to make a note today, before I carry out any more proceedings, that a mistake has been made. I don't want construction in the neighborhood and I think that any changes that have to be made is my responsibility. So, again, I'll have to support Alternative 3, no changes is to be made." (*Thomas Shaw, Public Hearing, December 11, 2014 [I-Shaw (2)]*)

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"I hope you are doing well. I would like to comment on the Draft EIR for Potrero Hope SF. Will you please respond to let me know you received my comments?" (*Suling Wang, email, January 6, 2015 [I-Wang]*)

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"The reason why I'm here today is I hope to bring about improvement in our community and also improve the safety and then improve the living environment." (*Ms. Zen, Public Hearing, December 11, 2014 [I-Zen]*)

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"Because where we live, the reputation is not so good where -- in the neighborhood where we live. Oh, oh, oh. And then where we live people tend not to come and visit because of the area. And I hope that there'll be some change to bring about. That's all." (*Ms. Zen, Public Hearing, December 11, 2014 [I-Zen]*)

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"Good morning. I'm happy to be here today at this community meeting. I am sincere and hopeful that the -- the city (indiscernible) will rebuild the space or the neighborhood. Currently, I reside on this side of Masonic [as spoken], 708. Oh, okay. The housing in this neighborhood, it's over a hundred years old, and many of which is in disrepair and there are leaks. Okay. And I sincerely hope that the city government --the city will rebuild this area and improve the neighborhood for the residents, community, and the children. That's all I have to say today. Thank you." (*Mr. Zhang, Public Hearing, December 11, 2014 [I-Zhang]*)

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"I'm Emily Weinstein. I'm with Bridge Housing, the master developer on the project, and I'm going to keep my comments very brief. But we are excited that this project is moving forward. We're excited about this step in the public process.

And the public process, the project you have before you, represents a two-year public process of a master plan. And we take the public process very seriously. And so I just wanted to also make sure that on the record, you know, due to the storm, we had over 25 closed to 30 -- public housing residents

that were signed up to come today. Due to the storm and the closures of the school, many were not able to be in attendance. So I just wanted to put that on record that this is not a great reflection of the public process and we're encouraging people to submit written comments. But it's important that you know that we have an ongoing public process, we have meetings every other month to make sure that people are included in the development process. So thank you." (*Emily Weinstein-Bridge Housing, Public Hearing, December 11, 2014 [O-Bridge Housing]*)

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"Good afternoon, Commissioners. My name is J. R. Eppler. I'm the president of Potrero Boosters Neighborhood Association. I want to start off by saying of course the condition of public housing on the south slope of Potrero Hill is catastrophically bad. It certainly needs to be redone. And I also want to say that Bridge Housing has played a very positive role in our community and they have been very excellent partners in this process." (*J. R Eppler-Potrero Boosters Neighborhood Association, Public Hearing, December 11, 2014 [O-Potrero Boosters]*)

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"And I think that there are some identified features that can be dealt with going forward after the EIR with just simple design features and back and forth among the neighbors.

Some of those, whether it's seen like vista from existing park space probably can be dealt with in design, might not be EIR related but should be pushed as part of the process going forward.

We have one chance to get the EIR right. We have one chance to get the planning process for this right. Because of the size of this project, it is vitally important -- because of all the other things going on, it's vitally important for us to make sure that we take even if it's just a little bit of additional time to get this part right because it is what is going to make this project work for all these residents. Thank you." (*J. R Eppler-Potrero Boosters Neighborhood Association, Public Hearing, December 11, 2014 [O-Potrero Boosters]*)

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"Good afternoon. Thank you for allowing me this opportunity to speak. My name is Thu Banh. I'm with Bridge Housing. I am the Rebuild Potrero program director." (*Thu Banh-Rebuild Potrero, Public Hearing, December 11, 2014 [O-Rebuild Potrero]*)

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"I just wanted to share a little bit of my perspective on behalf of the residents that aren't able to attend today. In my capacity, we do a lot of community building with residents and what I've heard from them is that obviously, as you know, the public housing was built back in the 40's and SRO's and hasn't

meant to stand and be in use as long as it has. And people are very excited and really looking forward to having new homes that - - where they don't have the fear of roaches or lead or mold and to live under the current conditions that they are living." (*Thu Banh-Rebuild Potrero, Public Hearing, December 11, 2014 [O-Rebuild Potrero]*)

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"Thank you very much. I also will echo strong support of this project. Public housing has always been a challenge in San Francisco. The lack of federal funding has meant that there hasn't been enough funding for maintenance, let alone improvement. So this is a fantastic move in the right direction, along with Alice-Griffith and some of the other public housing sites that will be rebuilt in the future." (*Commissioner Johnson, Public Hearing, December 11, 2014 [A-Commissioner Johnson]*)

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"Okay. I wanted to also express a lot of support for this project, happy that we're at this movement in it." (*Commissioner Wu, Public Hearing, December 11, 2014 [A-Commissioner Wu]*)

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#### Response GC-1

Most of these comments provide introductions and background information about the commenter, and/or the commenter's contact information. Some comments raise concerns regarding concerns that are non-CEQA/NEPA related. For example, comments expressing opposition to or support for the project do not pertain to the adequacy of the Draft EIR/EIS but may be considered by the decision makers in their certification of the EIR/EIS and ultimate approval of the Proposed Project.

Please also see Responses PD-1 through PD-8 for a discussion of project details; Response LU-1 for a discussion of the project's relationship with the neighborhood character; Responses AE-1 through AE-4 for a discussion of visual quality/aesthetic resources; Responses SE-1 through SE-4 for a discussion of socioeconomic and community/population and housing; Responses TR-1 through TR-10 for a discussion of transportation and circulation; Responses NO-1 and NO-2 for a discussion of noise; Responses AQ-1 through AQ-5 for a discussion of air quality; Response GG-1 for a discussion on greenhouse gas emissions; Responses WS-1 through WS-3 for a discussion of wind and shadow; Response RE-1 for a discussion of recreational and open space areas; Responses UT-1 through UT-7 for a discussion of utilities and service systems; Responses PS-1 through PS-3 for a discussion of public services; Responses BI-1 and BI-2 for a discussion of biological resources; Responses HZ-1 through HZ-3 for a discussion of hazards and hazardous materials; Response ME-1 for a discussion of energy efficiency; Response CA-1 for a discussion of cumulative analysis; and Responses OC-1 through OC-3 for a discussion of other CEQA/NEPA considerations.

Comment GC-2: Comments regarding Project amenities/appliances

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Schurnghammer

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“Will there be wash machine and dryer hook ups? Some of the new developments didn’t have wash machine hook-ups because they didn’t account for the square footage when being built.” *(Marlene Schurnghammer, letter, undated [I-Schurnghammer])*

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“P.S. Wifi is free in this area. Will that remain once developed?” *(Marlene Schurnghammer, letter, undated [I-Schurnghammer])*

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Response GC-2

These comments are in regard to the provision of certain Project amenities/appliances (such as washing machines, dryers, and wireless internet services). The availability of amenities/appliances is beyond the scope of CEQA/NEPA analysis; therefore further response is required.

Comment GC-3: Comments that are speculative and may include unsupported statements

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Abel (1)

I-Cameron

I-Schurnghammer

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“One bright point, not specifically outlined in the report but told to me as a strong possibility, is that the first tear down/build up section will be right across the street from my house, on Wisconsin between 25th and 26th, and that it will be market rate housing. I applaud this for several reasons. First, if they build new housing at the old basketball court and then move current residents from the units closest to Wisconsin and 25/26, that will solve the initial problem of relocation and they won’t have to move again. Then, by building the first large section on Wisconsin 25/26, it will provide a sound and dust barrier to all the work that follow for many years on the rest of the project. Also, there will be a cash

inflow with the market rate housing section being done so early on the project. It is a win, win, win situation”(Lee Abel, letter, January 4, 2015, [I-Abel (1)])

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“Misappropriation of the Public Purse: \$1 billion in subsidies, plus a free 39 acres parcel of land worth \$300 million to build 1200 subsidized housing units is more than \$1 million per unit. Enough said. For more detailed argument, please see my blog.” (Reynolds Cameron, email, January 7, 2015 [I-Cameron])

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“Time and again I’ve seen HUD try to rebuild and establish new residences for low income and fixed income people only to have these people turned away because they can’t afford the new and improved home. Just saying.”(Marlene Schurnghammer, letter, undated [I-Schurnghammer])

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Response GC-3

These comments do not relate to the adequacy of the Draft EIR/EIS and response is necessary.

However, please see Response PD-6 for a discussion of the project’s construction duration and phasing, and Response PD-7 for a discussion of the project’s merit.

Comment GC-4: Comment relating to the adequacy of the Draft EIR/EIS for this Project

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-Robbins

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“I am writing today as a concerned neighbor in response to the Potrero Hope SF EIR/EIS. While I support the effort to redevelop the Potrero Annex/Potrero Terrace projects, I have a number of concerns about the size, scope, and specifics of the Proposed Project that I do not feel were adequately addressed in the EIR/EIS. In several incidences, the EIR/EIS presents information that is inaccurate and misleading. I believe the EIR/EIS should be redone and/or amended, and the plan brought in line with Environmental Mandates and with the SF Planning Department’s goals and policies.

This letter details several concerns with the EIR/EIS and demonstrates that the EIR/EIS directly contradicts the SF Planning Department’s Objectives and Policies, as well as environmental mandates required by California and National Law.” (Nathaniel Robbins, M.D., letter, December 11, 2014 [I-Robbins])

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Response GC-4

This comment raises general concerns regarding the adequacy of the Draft EIR/EIS. These generally conclusory comments concerning the adequacy or inadequacy of the Draft EIR/EIS are general and do not specifically raise an issue for which a response can be provided. Nevertheless, this comment will be considered by the decision makers in their certification of the EIR/EIS and ultimate approval of the Proposed Project.

Comment GC-5: Comments praising the work of the Planning Department on the Draft EIR/EIS for this Project

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Commissioner Moore

A-Commissioner Antonini

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“Notwithstanding that this is an outstanding project, I want to just jump into commenting on the EIR. I think that the EIR is very good. It’s well structured.” (*Commissioner Moore, Public Hearing, December 11, 2014 [A-Commissioner Moore]*)

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“I think the draft EIR has a lot of things that are very well done, in my opinion.” (*Commissioner Antonini, Public Hearing, December 11, 2014 [A-Commissioner Antonini]*)

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Response GC-5

The San Francisco Planning Department wishes to thank the Planning Commission members for their positive feedback on this Draft EIR/EIS. No further response is required.

Comment GC-6: Comments requesting text changes to the Draft EIR/EIS for this Project

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-Caltrans

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“2. Page S-20, Executive Summary Table S-1, Impact TR-2(b): Effects on Freeway Segments - CEQA: The subjects should be The Housing Replacement Alternative and the No Project Alternative, not the Proposed Project and the Reduced Development Alternative. Please clarify.” (*Department of Transportation, letter, January 6, 2015 [A-Caltrans]*)

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Response GC-6

The City would like to thank the commenter for identifying an error in Table S-1, Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures, in the Draft EIR/EIS document. Impact TR-2(b) incorrectly referenced the Proposed Project and the Reduced Development Alternative.

Page S-20, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<b>Impacts/Effects</b>	<b>Proposed Project</b>	<b>Alternative 1: Reduced Development Alternative</b>	<b>Alternative 2: Housing Replacement Alternative</b>	<b>Alternative 3: No Project Alternative</b>	<b>Mitigation Measures</b>
Impact TR-2(b): Effects on Freeway Segments					
CEQA: <u>The Housing Replacement Alternative and the No Project Alternative</u> The Proposed Project and the Reduced Development Alternative would not result in the deterioration of LOS or contribute substantial traffic volumes to a freeway ramp.	—	—	No Impact	No Impact	n/a

This revision does not alter the analysis or conclusions of the Draft EIR/EIS. No further response is required.



# RTC CHAPTER 4 Draft EIR/EIS Revisions

This chapter presents specific revisions to the text of the Draft EIR/EIS that are being made in responses to comments, or to amplify and clarify material in the Draft EIR/EIS. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Deletions to text in the Draft EIR/EIS are shown with ~~strikethrough text~~. Page numbers correspond to the page numbers of the Draft EIR/EIS. The revisions to the Draft EIR/EIS derive from two sources: (1) comments raised in one or more of the comment letters received by the City and County of San Francisco and Major’s Office of Housing and Community Development on the Draft EIR/EIS; and (2) staff-initiated changes that correct minor inaccuracies, typographical errors or to clarify material found in the Draft EIR/EIS subsequent to its publication and circulation. Staff-initiated changes to clarify information presented in the Draft EIR/EIS are highlighted by an asterisk (\*) in the margin to distinguish them from text changes associated with responses to comments. None of the changes or clarifications presented in this chapter significantly alters the conclusions or findings of the Draft EIR/EIS.

## SUMMARY

Page S-20, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<i>Impacts/Effects</i>	<i>Proposed Project</i>	<i>Alternative 1: Reduced Development Alternative</i>	<i>Alternative 2: Housing Replacement Alternative</i>	<i>Alternative 3: No Project Alternative</i>	<i>Mitigation Measures</i>
Impact TR-2(b): Effects on Freeway Segments					
CEQA: <u>The Housing Replacement Alternative and the No Project Alternative</u> <del>The Proposed Project and the Reduced Development Alternative</del> would not result in the deterioration of LOS or contribute substantial traffic volumes to a freeway ramp.	—	—	No Impact	No Impact	n/a

Pages S-16 through S-18, Table S-1 of the Draft EIR/EIS have been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<b>Impacts/Effects</b>	<b>Proposed Project</b>	<b>Alternative 1: Reduced Development Alternative</b>	<b>Alternative 2: Housing Replacement Alternative</b>	<b>Alternative 3: No Project Alternative</b>	<b>Mitigation Measures</b>
Impact CP-3: Effects on Paleontological Resources					
CEQA: The Proposed Project or its alternatives could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	No Impact	Mitigation Measure M-CP-3a – Discovery of Paleontological Resources
<u>NEPA: This topic is not covered under NEPA. The Proposed Project or its alternatives could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Mitigation Measure M-CP-3a – Discovery of Paleontological Resources</u>
Impact C-CP-3: Cumulative Effects on Paleontological Resources					
CEQA: The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, could result in a significant cumulative impact related to paleontological resources.	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	Less than Significant with Mitigation	Mitigation Measure M-CP-2a – Archaeological Resource Discovery
<u>NEPA: This is not a topic covered under NEPA. The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, could result in a significant cumulative impact related to paleontological resources.</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Less than Significant with Mitigation</u>	<u>n/a Mitigation Measure M-CP-2a – Archaeological Resource Discovery</u>

Page S-16, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<i>Impacts/Effects</i>	<i>Proposed Project</i>	<i>Alternative 1: Reduced Development Alternative</i>	<i>Alternative 2: Housing Replacement Alternative</i>	<i>Alternative 3: No Project Alternative</i>	<i>Mitigation Measures</i>
Impact GE 5: Effects on Septic Tanks					
CEQA: The Proposed Project or its alternatives would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No Impact	No Impact	No Impact	No Impact	n/a
NEPA: This topic is not separately covered under NEPA. <u>The Proposed Project or its alternatives would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	<u>n/a No Impact</u>	n/a

Page S-58, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<i>Impacts/Effects</i>	<i>Proposed Project</i>	<i>Alternative 1: Reduced Development Alternative</i>	<i>Alternative 2: Housing Replacement Alternative</i>	<i>Alternative 3: No Project Alternative</i>	<i>Mitigation Measures</i>
Impact HY-6: Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure					
CEQA: The Proposed Project or its alternatives would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam.	No Impact	No Impact	No Impact	No Impact	n/a

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<i>Impacts/Effects</i>	<i>Proposed Project</i>	<i>Alternative 1: Reduced Development Alternative</i>	<i>Alternative 2: Housing Replacement Alternative</i>	<i>Alternative 3: No Project Alternative</i>	<i>Mitigation Measures</i>
NEPA: This topic is not covered under NEPA. <u>The Proposed Project or its alternatives would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam.</u>	n/a <u>No Impact</u>	n/a <u>No Impact</u>	n/a <u>No Impact</u>	n/a <u>No Impact</u>	n/a

Page S-20, Table S-1 of the Draft EIR/EIS has been revised as follows:

<b>Table S-1 Summary of CEQA Impacts, NEPA Effects, and Mitigation Measures</b>					
<i>Impacts/Effects</i>	<i>Proposed Project</i>	<i>Alternative 1: Reduced Development Alternative</i>	<i>Alternative 2: Housing Replacement Alternative</i>	<i>Alternative 3: No Project Alternative</i>	<i>Mitigation Measures</i>
Impact TR-2(b): Effects on Freeway Segments					
CEQA: <u>The Housing Replacement Alternative and the No Project Alternative</u> The Proposed Project and <del>the Reduced Development Alternative</del> would not result in the deterioration of LOS or contribute substantial traffic volumes to a freeway ramp.	—	—	No Impact	No Impact	n/a

### 3.1.8 San Francisco Green Building Ordinance (SFBGO)

The following text on pages 3-11 through 3-12 has been revised as follows:

The ordinance requires compliance with the applicable LEED performance standards or GreenPoint Rated checklists (which applies mostly to residential buildings) for New Construction, Version 2.2, LEED criteria Sustainable Sites (SS) 6.1 and ~~SS6.2~~ for storm water management, as well as the best management practices (BMPs) and ~~Stormwater Design Guidelines of the SFPUC (1304C.0.3)~~. Additionally, for high-rise residential buildings (1304C.1.3), new group B (Business) and M (Mercantile) occupancy buildings (1304C.2), and new large commercial buildings (1304C.2.2), water efficient landscaping (LEED credit WE1.1) and water conservation are required (LEED credit WE3.2).

~~LEED SS6.2 addresses storm water management and has been adopted by the San Francisco Stormwater Design Guidelines for MS4s.<sup>z</sup>~~ The stormwater management program seeks to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event (for semi-arid watersheds; in San Francisco, treatment of 90 percent is interpreted as treating runoff produced by a rain event generating 0.75 inch) using acceptable BMPs. In addition, BMPs used to treat runoff must be capable of removing 80 percent of the average annual post development total suspended solid load contained in stormwater runoff. The BMPs are considered to meet these criteria if (1) they are designed in accordance with standards and specifications from a state or local program that has adopted these performance standards, or (2) there are filed performance monitoring data that demonstrate compliance with the criteria. LEED WE1.1 addresses water efficient landscaping. New construction that is required to comply with this credit must submit documentation verifying a minimum of 50 percent reduction in use of potable water for landscaping (compared to the mid-summer baseline case). LEED WE3.2 addresses water use reduction. Permit applicants must submit documentation demonstrating achievement of a minimum 20 percent reduction in the use of potable water. Effective January 1, 2011, the required reduction in use of water is 30 percent (compared to the water use baseline calculated for the building [not including irrigation] after meeting the USEPA Energy Policy Act of 1992 requirements).

The visual quality/aesthetics chapters have been revised based on comments received related to views. Due to the magnitude of changes to these Draft EIR/EIS sections which resulted in changes to the figure numbering, the revised section is presented below in its entirety.

## 4.3 VISUAL QUALITY/AESTHETICS

### 4.3.1 Introduction

This section describes the visual character and aesthetics of the affected environment within and around the Project site. The visual character and aesthetics of an area is created by elements of the natural and built environment and their physical relationship to each other, as perceived by people. This section focuses on the existing visual character of the Potrero Hill area and the Project site, including the views of and from the Project site.

Several comments on aesthetics were submitted during the Notice of Preparation (NOP) and Notice of Intent (NOI) scoping periods. Specifically, concerns were raised regarding: increased building heights, inconsistency with the design of existing buildings, impacts to existing views and vistas, tree

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<sup>z</sup> ~~An MS4 is a conveyance or system of conveyances that is owned by a state, city, town, village, or other public entity that discharges to waters of the U.S.; designed or used to collect or convey stormwater (including storm drains, pipes, ditches, etc.); not a combined sewer; and not part of a Publicly Owned Treatment Works (sewage treatment plant).~~

removal, reductions in open space, and lighting and glare impacts. However, comments made on the NOP are not addressed in this document as they relate to CEQA. On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 added Section 21099 to the Public Resources Code and eliminated the analysis of aesthetics for certain urban infill projects under CEQA. The Proposed Project meets the definition of a mixed-use residential project on an infill site within a transit priority area as specified by Section 21099. Accordingly, this document does not provide CEQA conclusions regarding aesthetics, which can no longer be considered in determining the significance of the Proposed Project's physical environmental effects under CEQA. Implementation of SB 743 was subsequent to the publication of the NOP, which had indicated that the EIR would include a discussion of aesthetics-related impacts of the Proposed Project. However, since the Proposed Project is subject to NEPA, comments made on the NOI as they relate to aesthetics are addressed and NEPA conclusions are provided in Section 5.3.

## 4.3.2 Environmental Setting

### ■ Regional Visual Setting

The Project site is situated on the southern and eastern slope of Potrero Hill, which is located in the southeast portion of the City. As shown in Figure 1-1 (Chapter 1, *Project Purpose, Need, and Objectives*), the neighborhood is generally bound by 16<sup>th</sup> Street to the north, Interstate 280 (I-280) to the east, 25<sup>th</sup> Street/26<sup>th</sup> Street to the south, and U.S. Highway 101 (US 101)/Potrero Avenue to the west. North of the Potrero Hill neighborhood is Showplace Square, and further north is the South of Market neighborhood. The Project site is approximately 1 mile west of the San Francisco Bay. The visual character of the vicinity is that of a built-out urban area. Generally, the City has a rectilinear street grid, and buildings are constructed to the lot line.

### ■ Local Visual Setting

The residential portion of Potrero Hill can be separated between the northern and southern portions. The northern slope has unobstructed views of the high-rise buildings in the Financial District to the north and the Bay to the east. This area of Potrero Hill has a fairly uniform development pattern consisting of Victorian-era and early 20th century single-family and multi-family dwellings, two- to three-stories in height, with limited setbacks. The residential streets on the northern slope are relatively wide, allowing for ample street parking. The northern slope also includes neighborhood commercial corridors, which are pedestrian-oriented and contribute to a fine pattern and an intimate scale.<sup>2</sup>

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<sup>2</sup> City and County of San Francisco, Planning Department, *Eastern Neighborhoods Rezoning and Area Plans Final EIR* (August 2008), <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=3999> (accessed July 11, 2011).

The southern slope has a greater mix of uses, resulting in a less coherent development pattern. Towards the base of the hill to the south, and along the I-280 corridor to the east, the local streets are lined with industrial uses and large warehouse buildings with associated parking lots. As the hill slopes upward, the Potrero Terrace (Terrace) and Potrero Annex (Annex) housing developments (the Project site, as described in more detail below) encompass a large portion of the hillside. More uniform single-family and multi-family residential units and Starr King Elementary School are located to the west of Wisconsin Street. Most residential buildings in the Project vicinity are two to four stories tall with typical heights of approximately 25 to 35 feet. At the apex of the hill sits the 9.6-acre Potrero Hill Recreation Center; however, due to its location at a higher elevation, the Recreation Center is not a dominant characteristic visible from the lower portion of neighborhood. Regional vehicular access to/from Potrero Hill is provided by I-280 and US 101, located to the east and west of Potrero Hill, respectively.

## ■ Project Site Visual Setting

The Project site comprises several parcels that contain the Terrace, the Annex, and an adjacent San Francisco Unified School District (SFUSD)-owned property. Combined, these parcels total approximately 39 acres. The Project site includes 38 residential buildings on the Terrace parcel and 23 residential buildings on the Annex parcel. The SFUSD site, also referred to as Block X, is vacant. The existing buildings are two to three stories tall with typical heights of approximately 24 to 34 feet. The circulation between the buildings consists of concrete walkways, steps, and retaining walls.

Currently, there are 254 trees that would be considered “significant” on and within the vicinity of the Project site.<sup>3</sup> The significance determination is based on the following: the trees are within 10 feet of a lot line abutting a public right-of-way and are above 20 feet in height, have a canopy greater than 15 feet in diameter, or have a trunk diameter greater than 12 inches at breast height. Out of the 254 significant trees, 249 are located on the Project site, while five trees are on adjacent properties that overhang the Project site. There are no landmark trees or street trees.<sup>4</sup>

### **Potrero Terrace**

The Terrace site is generally bound by 23<sup>rd</sup> Street to the north, ~~Dakota~~-Texas Street to the east, 26<sup>th</sup> Street to the south, and Wisconsin Street to the west. The 17.6-acre Terrace site currently includes 38 separate buildings, open spaces, mature trees, limited vegetation, and parking for residents.

**On-Site Topography.** The Project site is characterized by steep topography and uneven slopes. The highest topographic elevation is to the north at the intersection of 23<sup>rd</sup> Street and Arkansas Street at 265 feet above mean sea level (msl) and the lowest elevation is to the south at the intersection of 26<sup>th</sup>

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<sup>3</sup> GLS Landscape/Architecture, Tree Disclosure Statement (June 23, 2010).

<sup>4</sup> GLS Landscape/Architecture, Tree Disclosure Statement (June 23, 2010).

Street and Connecticut Street at 40 feet above msl. The footprint of each building is aligned with the site topography, oriented according to the slope.

**Visual Character and Development Pattern.** The most prominent feature at the Terrace site is the topography. Due to the steep terrain, the Terrace buildings and the streets were constructed to match the contours of the hillside. This gives the appearance that the buildings are situated randomly on the hillside; however, they actually follow the contours of the land to reduce the required amount of soil cut and fill and to help prevent erosion. As such, the development pattern of the Project site is visually inconsistent with its surroundings and the bisecting streets do not follow the typical grid pattern of City streets.

Each of the buildings is rectangular in plan, constructed of reinforced poured-in-place concrete, and features a hipped, mission barrel tile roof. Because of the steep slopes at the Terrace site, the buildings are two stories in height on the uphill side and three stories on the downhill side. The alternating blue-, white-, and terracotta-colored buildings have minimal architectural articulation and detail. The façades facing south feature a second-floor balcony with metal wire-mesh railing. The entry doors are located on both the northern and southern façades at ground level and the windows are relatively small and uniform. The side elevations of the buildings feature a single entry door with wire-mesh railing and a flat concrete awning projection above.

The areas surrounding the buildings feature concrete walkways, steps, retaining walls, and limited vegetation. T-shaped pipes, which are visible from the surrounding streets, are evenly spaced along the internal walkways for hanging laundry. Overhead wires with utility poles are prominent features along the Project site perimeter and traverse the site in some areas. In addition, parking stalls are provided in designated areas at 90-degree angles in driveways.

The moderate-scale development and open space between the buildings at the Project site are inconsistent with surrounding industrial uses to the east and south and gridded streets with dense housing to the north and west. This contrast contributes to an incoherent visual pattern with limited unity between the Terrace site and its surroundings. However, the Terrace site is visually consistent with the development at the Annex site, which is discussed in more detail below.

**Vegetation and Lighting.** Vegetation throughout the Terrace site is in poor condition and sparse. Between the buildings and concrete walkways is a combination of grass, dirt, small shrubs, and mature trees. The mature trees are scattered intermittently throughout the site without a consistent pattern. There are no street trees. Sloped lawns are located between the buildings to the west of Connecticut Street. In addition, flower beds are located immediately in front of the south-facing façades of the buildings. The buildings between Dakota Street and Connecticut Street are on a steeper slope, making landscaping difficult to grow and maintain. Therefore, vegetation is sparse in this area.



Street lighting is currently limited at the Terrace site. Cobra-style street lighting<sup>5</sup> is evenly spaced along Dakota Street, Connecticut Street, Wisconsin Street, 23<sup>rd</sup> Street, 25<sup>th</sup> Street, and 26<sup>th</sup> Street. No lighting is provided on the walkways or open spaces between or around the units. One wall-mounted light fixture is provided at each door, along the roofline. At night, some interior light from the buildings spills onto the adjacent open spaces and streets.

**Visual Quality and Affected Viewers.** Overall, the visual quality of the Potrero Terrace is moderately low. This is due to buildings which lack architectural appeal, have occasional windows and doors that are boarded, and the lack of landscaping. Overall visual feel is stark. Roadways, pathways, and parking areas are in various states of repair and while some are maintained, others are deteriorating. Non-landscaped areas are denuded of vegetation. Residential viewers living at the Project site are deemed to have moderately high viewer sensitivity to changes occurring at the Project site as residents are likely to have a high sense of ownership over views.

### ***Potrero Annex***

The Annex site is generally bound by Missouri Street to the north and west, Texas Street to the east, and Dakota Street to the south and west. Separating the site from I-280 are industrial uses/warehouses to the east. Potrero Hill Recreation Center borders the site to the west. The 7.24-acre site currently includes 23 separate buildings, open spaces, mature trees, limited vegetation, and parking for residents.

**On-Site Topography.** The Project site is characterized by steep topography and uneven slopes, which have been significantly modified from their natural, undeveloped state. The highest topographic elevation is to the northwest along Missouri Street at 220 feet above msl and the lowest elevation is to the east along Texas Street at 60 feet above msl. The footprint of each building is aligned with the topography, oriented according to the slope.

**Visual Character and Development Pattern.** The most prominent feature at the Annex site is the topography. Due to the steep terrain, the Annex buildings and the streets were constructed to match the contours of the hillside. Two cul-de-sacs, Watchman Way and Turner Terrace, extend east into the development from Missouri Street. Texas Street, to the east of the site, is an extremely narrow, unevenly paved, unmarked roadway.

The wood-framed, rectangular buildings painted in blue, white, and terra-cotta colors have flat roofs canted at a slight angle. The two- and three-story buildings feature a combination of the original windows and replacement windows, evenly spaced along the façades of the buildings. The east-facing elevations feature second- and third-floor balconies with clapboard rails. The west elevations feature entries with flat awnings, some of which provide an area for flower pots. Buildings include staircases

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<sup>5</sup> Cobra-style lamps are the most common form of street lighting, with the luminaire mounted on a utility pole that curves to hang over the street.

leading from the second-level balcony to the third-level balcony on either the north- or south-facing façade.

The areas surrounding the buildings include a circulation network of concrete walkways and stairs, with chain-link fencing and some mature trees. Play areas are enclosed by chain-link fencing on the east-facing, level areas adjacent to some buildings. Overhead wires with utility poles traverse the site in certain areas. In addition, limited parking areas are provided at 90-degree angles in areas removed from the street. Most parking areas are paved and unmarked. Along Texas Street, off-street parking is provided in unmarked, dirt offshoots. Parallel parking is also available.

The moderate-scale development and expanse of open space between the buildings is inconsistent with industrial uses to the east and the Potrero Hill Recreation Center to the west. The various uses provide incoherent visual patterns and limited unity of the Annex site with respect to its surroundings. However, the Annex site is similar to the development at the Terrace site, which is discussed above.

**Vegetation and Lighting.** Landscaping throughout the Annex site is minimal. The landscaping is urban and limited to mature trees and dirt hills with non-native, ruderal groundcover and shrubs. The mature trees are scattered intermittently throughout the site and there are no street trees. Lighting is currently limited. Cobra-style lighting is evenly spaced along Missouri Street, Turner Terrace, and Watchman Way. Texas Street features only two light fixtures, which are attached to the utility poles that run east/west along the hill. Wall-mounted light fixtures are provided on the exteriors of each building. No lighting is provided on the walkways or open spaces between or around the units. At night, some interior light from the buildings spills onto the adjacent open spaces and streets.

**Visual Quality and Affected Viewers.** Overall, the visual quality of Potrero Annex is moderately low since, while the buildings are maintained to a degree, they lack architectural appeal, have windows and doors that are boarded, and the overall visual feel is stark due to a lack landscaping which, if present, would improve visual conditions and soften the transition between buildings and outdoor spaces. Roadways, pathways, and parking areas are in ill-repair and are deteriorating. Residential viewers living at the Project site are deemed to have moderately high viewer sensitivity to changes occurring at the Project site as residents are likely to have a high sense of ownership over views.

### **SFUSD Site**

The SFUSD site is bound by 25<sup>th</sup> Street to the north; a vacant site to the east; a plumbing, heating, and cooling supplies warehouse to the south, and Connecticut Street to the west. The SFUSD site consists of a paved basketball court and a paved area with cracked asphalt and weeds; both of which are open to the public. A chain-link fence lines the perimeter of the basketball court. To the south of the basketball court is a paved area with ruderal vegetation, also surrounded by a chain-link fence. To the south of this area, between the warehouse building and the SFUSD site, are several mature trees. No lighting is provided at the site. Overall, the visual quality of SFUSD site is low because it lacks

organized site programming of outdoor space, is not well-maintained and is in a state of neglect, and is generally visually deteriorated. Viewers using the site have moderately low viewer sensitivity because while this site provides recreational opportunities, it is degraded and other, higher-quality recreational facilities are located nearby, such as at the Potrero Hill Recreation Center.

## ■ Site Visibility and Existing Views

A “viewshed” is what people can see in the landscape, and can be either confined or an expansive. A viewshed is defined by the physical constraints of the environment and the physiological limits of human sight. Physical constraints of the environment include landform, land cover, and atmospheric conditions. Landform can limit views or provide an elevated perspective for viewers. Similarly, land cover such as trees and buildings can limit views while low growing vegetation and the absence of structures can allow for unobscured views. Atmospheric conditions such as smoke, dust, fog, or precipitation can temporarily reduce visibility.

The physiological limits of human sight are affected by location, proximity, and light. Location refers to the topographic position of the viewer such as being even with or above or below what is being observed. Proximity is broken down into three distance zones: foreground (up to 0.5 mile from the viewer), middleground (0.5 mile to 3 to 5 miles from the viewer), and background (from 3 to 5 miles to infinity). Features in the landscape are more dominant and have a greater importance the closer the resource is to the viewer; whereas importance is reduced the further away features are from the viewer. This is because details and features in the landscape, including project elements, become lost and comprise a smaller portion of the total landscape as distance from the viewer increases. In the background, the scale and color of existing landscape elements and project features blend so that only broad forms, large-scale patterns, and muted colors are evident. Light influence also plays a large role in affecting views such as during the daytime when views are more readily available versus the nighttime when darkness greatly reduces the ability to see details and color in the landscape without bright moonlight or artificial light sources. In addition, lighting levels change throughout the day, making color and individual forms more prominent with more light and less distinct as light decreases.

The environment’s physical constraints and limits of human sight combine to provide for viewsheds that range from restrictive and more confined to expansive and wider reaching, like scenic vistas views.<sup>6</sup> visually important area of land, water, and/or other environmental and physical elements visible from a fixed vantage point.

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<sup>6</sup> Federal Highway Administration. 2015. *Guidelines for the Visual Impact Assessment of Highway Projects*. (FHWA-HEP-15-029.) USDOT (US Department of Transportation). Washington, DC. January 2015. (pp. 4-5 – 4-9, 6-3 – 6-4) and Litton, R. Burton, Jr. 1968. *Forest Landscape Description and Inventories – A Basis for Land Planning and Design*. (U.S. Department of Agriculture Forest Service Research Paper PSW-49) Pacific Southwest Forest and Range Experiment Station. Berkeley, CA. 1968. (pp. 3 – 5)

Scenic vistas views generally encompass a wide area with long-range views to surrounding elements in the landscape. Such views are afforded usually because a flat landscape with little vegetation or an elevated viewing point allows for views out and over the surrounding landscape. Vistas also have a directional range, which is to say that some viewpoints have scenic vistas with a 360-degree view in all directions, while others may be limited in one direction in a manner that reduces the line of sight angle and amount of vista that is visible for a narrower vista view. In such cases, narrower vista views are often confined by topography, development, and vegetation. More specifically, Scenic vista viewsheds allow the public panoramic view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features, also referred to as scenic resources. The term “view corridor” refers to views of significant features from along a path, roadway, or other horizontal corridor where the view is more confined by. View corridors often have limited visibility to either side due to obstructions such as development or vegetation. As such, a view from a view corridor that has limited lateral visibility and is referred to as a channelized view. Within a viewshed, a scenic resource is broadly defined as something in the environment with scenic or visual qualities and can include (but is not limited to) stands of trees, rock outcroppings, historic buildings, views of an urban skyline, or a visually important area of land, water, and/or other environmental and physical elements that can be seen. Scenic resources may be protected by federal, state, or local regulations or can be resources that are highly valued by the local community. Sensitive viewing points within the City include parks, historic properties, publicly-accessible buildings, and public rights-of-way that offer a view of the urban and natural landscapes making up the Bay Area viewshed.

Due to the steep topography of the Project site and low-scale development in the immediate vicinity, views to and from the Project site are extensive. Foreground views from the Project site include the existing housing developments at Terrace and Annex sites and the limited mature trees and vegetation. Foreground views of the adjacent Potrero Hill Recreation Center from the north (Terrace) and west (Annex) is limited due to the park’s higher elevation; only the retaining wall and perimeter vegetation is visible.

Immediate middleground views from the Project site include the surrounding development, with the warehouses and industrial uses to east and south, and the residential development and Starr King Elementary School to the west. In addition, the Annex site includes mid-range views of the residential area in the northern portion of Potrero Hill. This view includes dense, mainly single-family residential units with landscaped front and backyards. Middleground views extend further away from the Project site and encompass the dense development in the southeastern portion of the City.

Features that are visible from the Project site, looking east and south, include: warehouse and industrial buildings with massive footprints that are relatively low in height; residential buildings and associated landscaping in the Bayview, Bernal Heights, Glen Park, Visitación Valley, and Dogpatch neighborhoods; the Hunters Point Shipyard and its shipping cranes and docks; India Basin and its bayside factory buildings and smokestacks; the Islais Creek Channel; Candlestick Point and the

football stadium. The areas adjacent to the Bay and at the base of Potrero Hill are relatively flat; however, there are several higher elevation hills and ridges visible including Hunters Point Hill, Bayview Hill, Mount St. Joseph, and John McLaren Park and Ridge. The visual pattern as viewed from the Project site is relatively consistent manmade development; however, I-280 travels through the middleground view, visually encroaching on the area and dividing the development.

Foreground or middleground ~~“viewsheds/” as defined above, are limited. F~~ rom the Project site, ~~because views are mainly views of local development exist, which are is not considered a significant visual resources, that limits views beyond.~~ However, middleground views exist from the higher elevation hills and ridges are considered to be middleground viewsheds in the Project area.

Long-range scenic vista views are extensive, allowing views to the background, and include many significant areas within the City as well as areas beyond the City in the East Bay and the San Francisco Peninsula (Peninsula). ~~These views are considered to be viewsheds.~~ Looking north from the Annex site, the high-rise buildings of the San Francisco Financial District are visible next to the southern towers of the Bay Bridge and Treasure Island. To the east, the Project site has unobstructed views of the Bay, the East Bay Hills and the East Bay cities along the Bay, including the City of Oakland and its financial district. Facing south, the northern slope of San Bruno Mountain is visible beyond John McLaren Ridge and the Santa Cruz Mountain Range extends southward down the Peninsula. Depending on the viewer location, long-range views from publicly-accessible streets are generally only blocked by mature trees or the on-site dwelling units; otherwise these long range views tend to be broad and unobstructed.

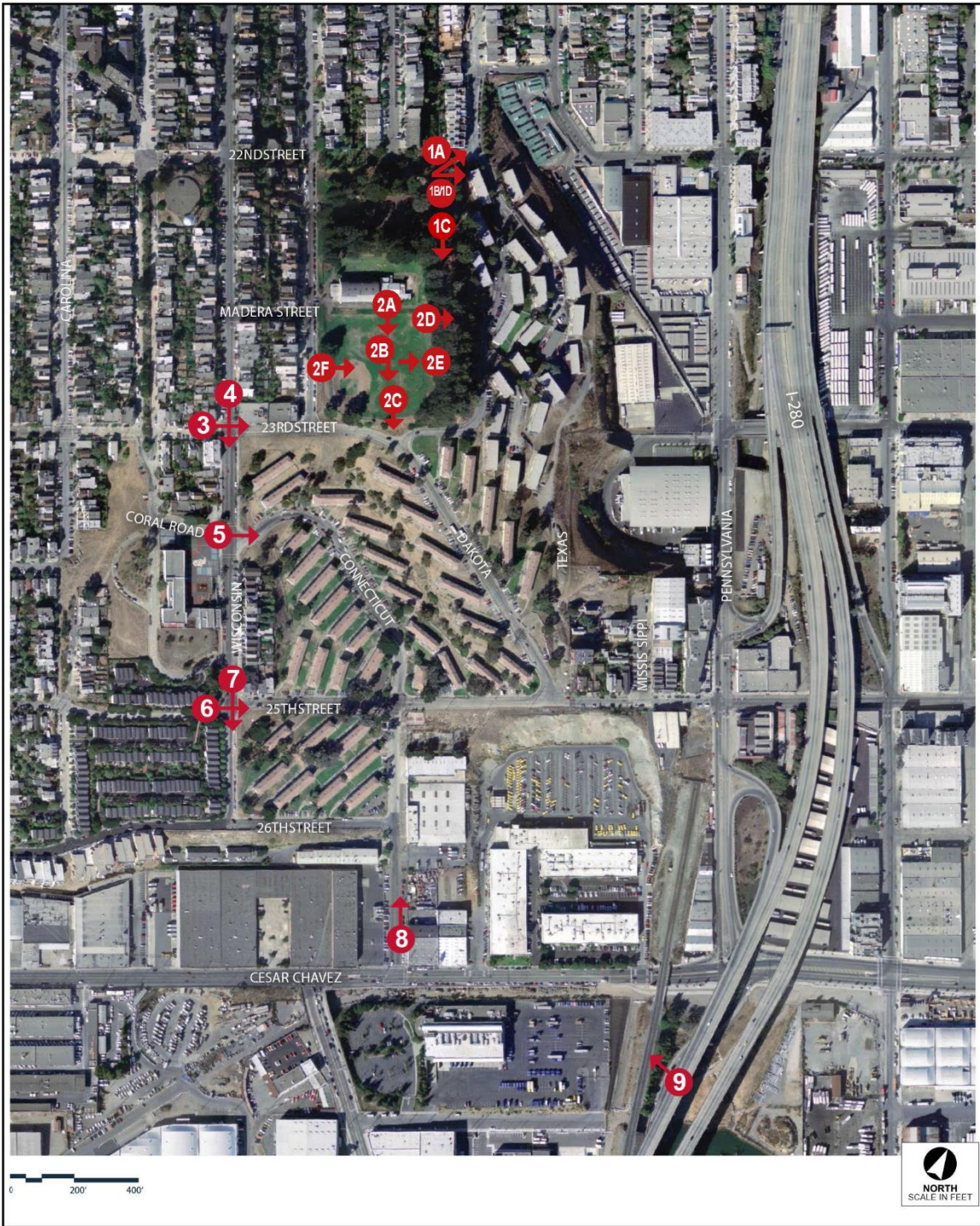
Just as many areas are visible from the Project site, the Project site is visible from several surrounding areas. Figure 4.3-1 depicts a photo location map of various viewpoints in the vicinity of the Project site. For discussion purposes, the viewpoints are categorized under the following headers: Potrero Hill Recreation Center and 22<sup>nd</sup> Street Trail (Viewpoints 1 and 2), Local Streets Surrounding the Project Site (Viewpoints 3 through 8), and I-280 (Viewpoint 9). Given the high visibility from public view corridors to the Project site, these locations are considered sensitive viewpoints that are described in more detail below. Figure 4.3-2 through Figure 4.3-6 ~~10~~ show the corresponding photos that illustrate the existing visual character of the Project site, view corridors, and viewsheds to and from the Project site.

To provide clarity, the following table illustrates which figure numbers correspond to viewpoints.

<b>Table 4.3-1 List of Figures and Viewpoint</b>			
<i>Figure</i>	<i>ID</i>	<i>Location</i>	<i>Description</i>
<u>4.3-2</u>	<u>1A</u>	<u>22<sup>nd</sup> Street Trail</u>	<u>Looking northeast</u>
	<u>1B</u>		<u>Looking southeast</u>
<u>4.3-3</u>	<u>1C</u>	<u>22<sup>nd</sup> Street Trail</u>	<u>Looking south</u>
	<u>1D</u>	<u>Bench below tennis courts</u>	<u>Looking east</u>
<u>4.3-4</u>	<u>2A</u>	<u>Potrero Hill Recreation Center</u>	<u>Looking south from northern edge of playfields</u>
	<u>2B</u>		<u>Looking south from middle of playfields</u>
<u>4.3-5</u>	<u>2C</u>		<u>Looking south from southern edge of playfields</u>
	<u>2D</u>		<u>Looking east from eastern edge of playfields</u>
<u>4.3-6</u>	<u>2E</u>		<u>Looking east from middle of playfields</u>
	<u>2F</u>		<u>Looking east from northwestern edge of playfields</u>
<u>4.3-7</u>	<u>3</u>	<u>23<sup>rd</sup> Street and Wisconsin Street</u>	<u>Looking east</u>
	<u>4</u>		<u>Looking south</u>
<u>4.3-8</u>	<u>5</u>	<u>24<sup>th</sup> Street and Wisconsin Street</u>	<u>Looking east</u>
	<u>6</u>	<u>25<sup>th</sup> Street and Wisconsin Street</u>	<u>Looking east</u>
<u>4.3-9</u>	<u>7</u>	<u>25<sup>th</sup> Street and Wisconsin Street</u>	<u>Looking south</u>
	<u>8</u>	<u>Connecticut Street at Cesar Chavez Street</u>	<u>Looking south</u>
<u>4.3-10</u>	<u>9</u>	<u>I-280</u>	<u>Looking west</u>

As described below, Viewpoints 1 and 2 represent views from a scenic vista, in this case, from the Potrero Hill Recreation Center. Viewpoints 3 through 8 represent public views of and through the Project site from outside the Project site. Viewpoint 9 represents a view from a state scenic highway, I-280, as described below. Given the high visibility from public view corridors to the Project site, these areas are considered sensitive viewer locations.

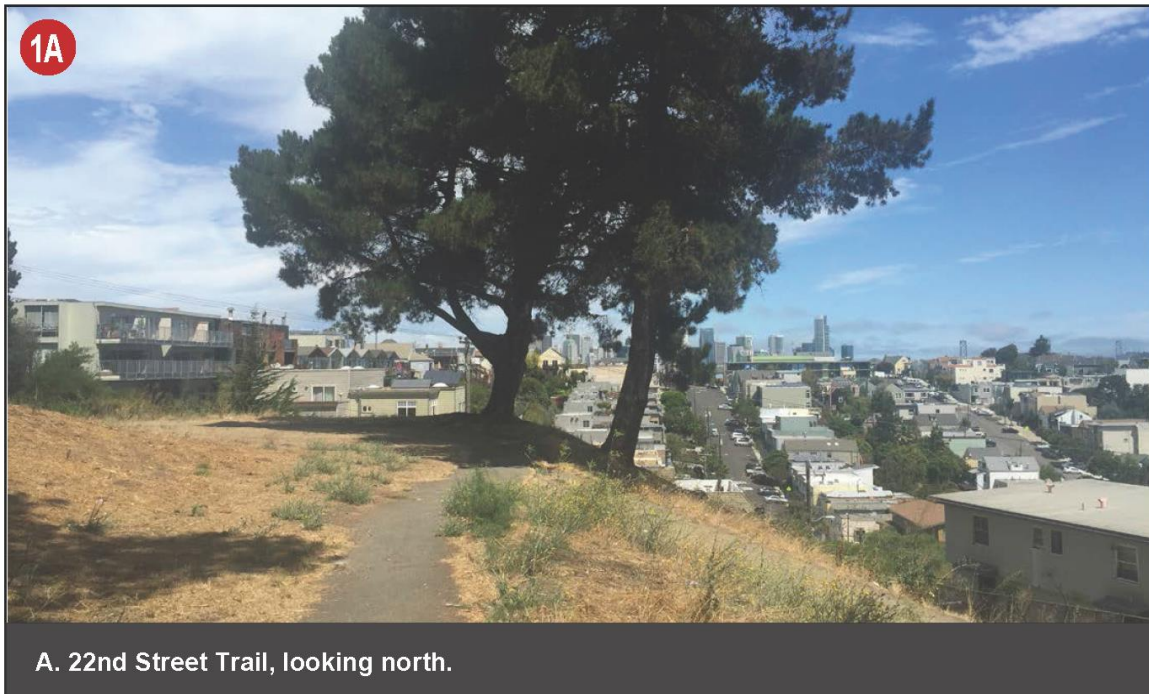




SOURCE: Van Meter Williams Pollack LLP, 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-1: VIEWPOINTS LOCATION MAP

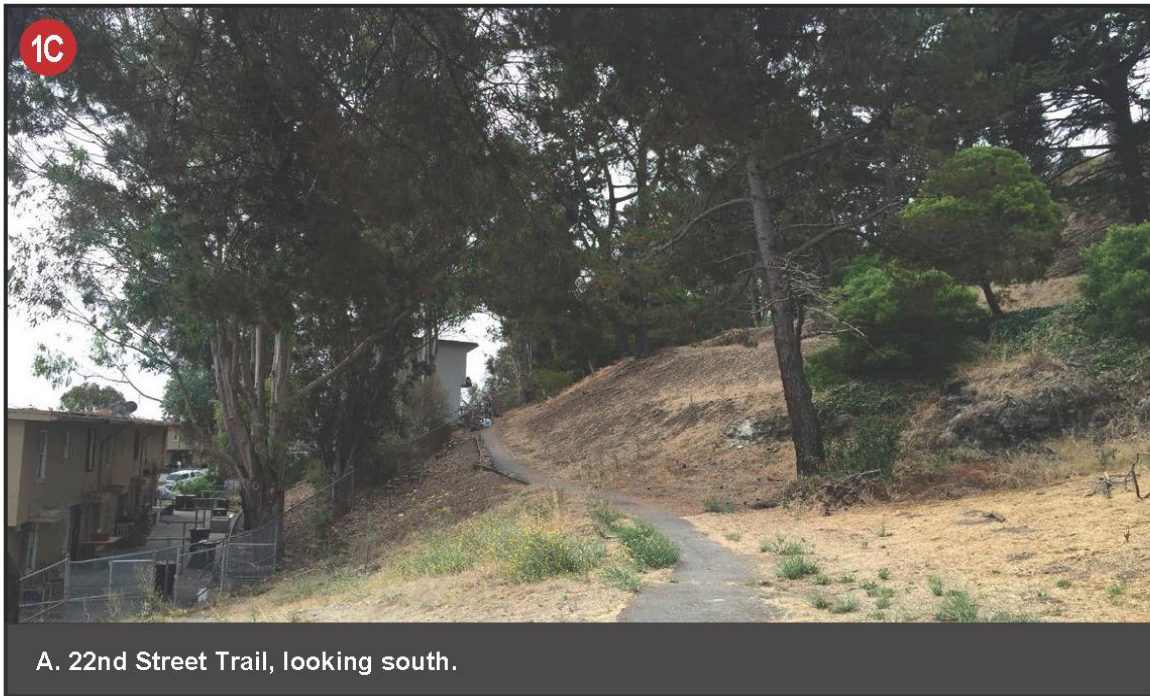




SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-2: EXISTING VIEWS (VIEWPOINTS 1A AND 1B)





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-3: EXISTING VIEWS (VIEWPOINTS 1C AND 1D)



SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-4: EXISTING VIEWS (VIEWPOINTS 2A AND 2B)





A. Potrero Hill Recreation Center, looking south from southern edge of playfields.

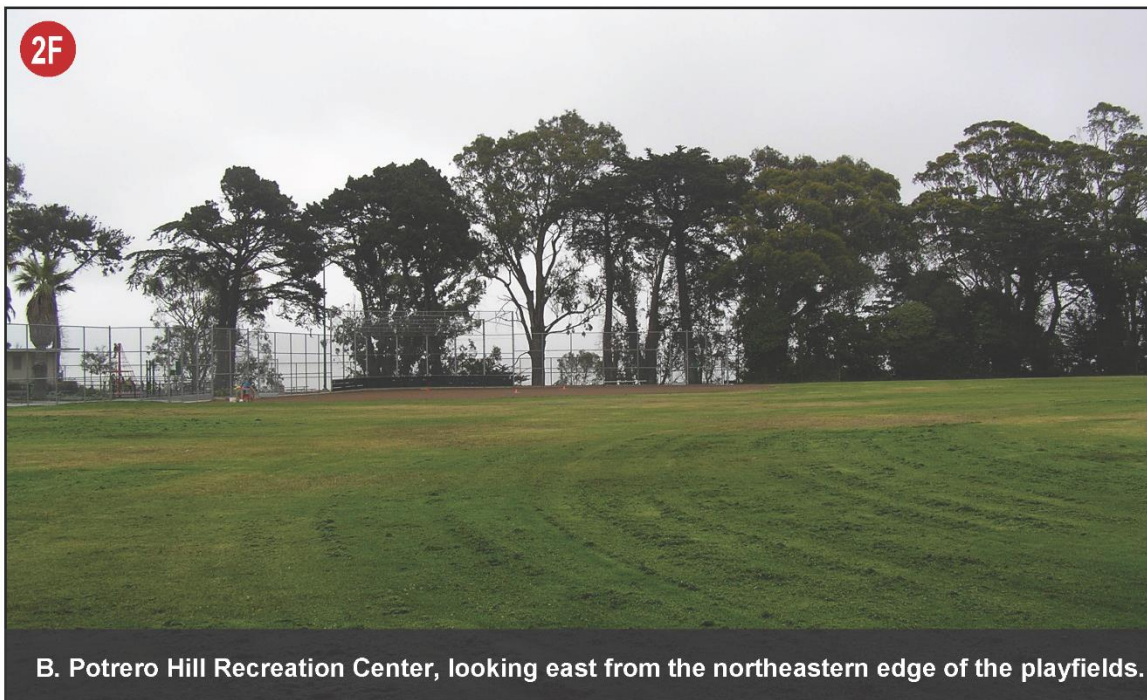


B. Potrero Hill Recreation Center, looking east from western edge of playfields.

SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-5: EXISTING VIEWS (VIEWPOINTS 2C AND 2D)





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-6: EXISTING VIEWS (VIEWPOINTS 2E AND 2F)





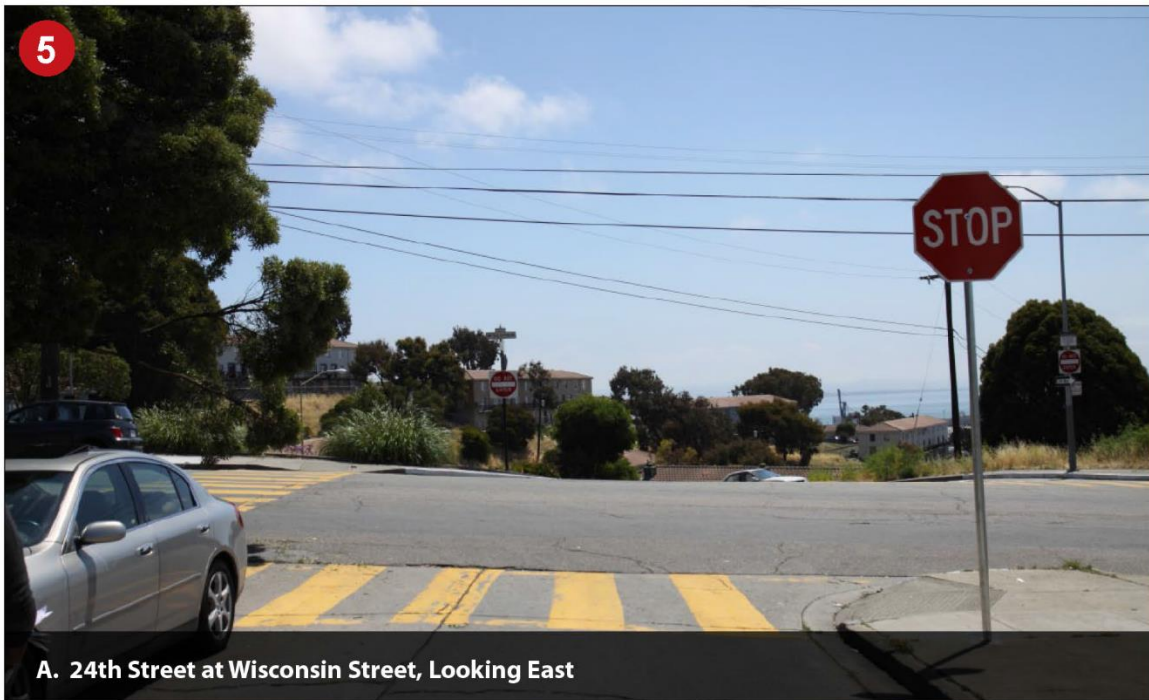
A. 23rd Street at Wisconsin Street, Looking East



B. 23rd Street at Wisconsin Street, Looking South

SOURCE: Van Meter Williams Pollack LLP, 2012.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-7: EXISTING VIEWS (VIEWPOINTS 3 AND 4)



SOURCE: Van Meter Williams Pollack LLP, 2012.

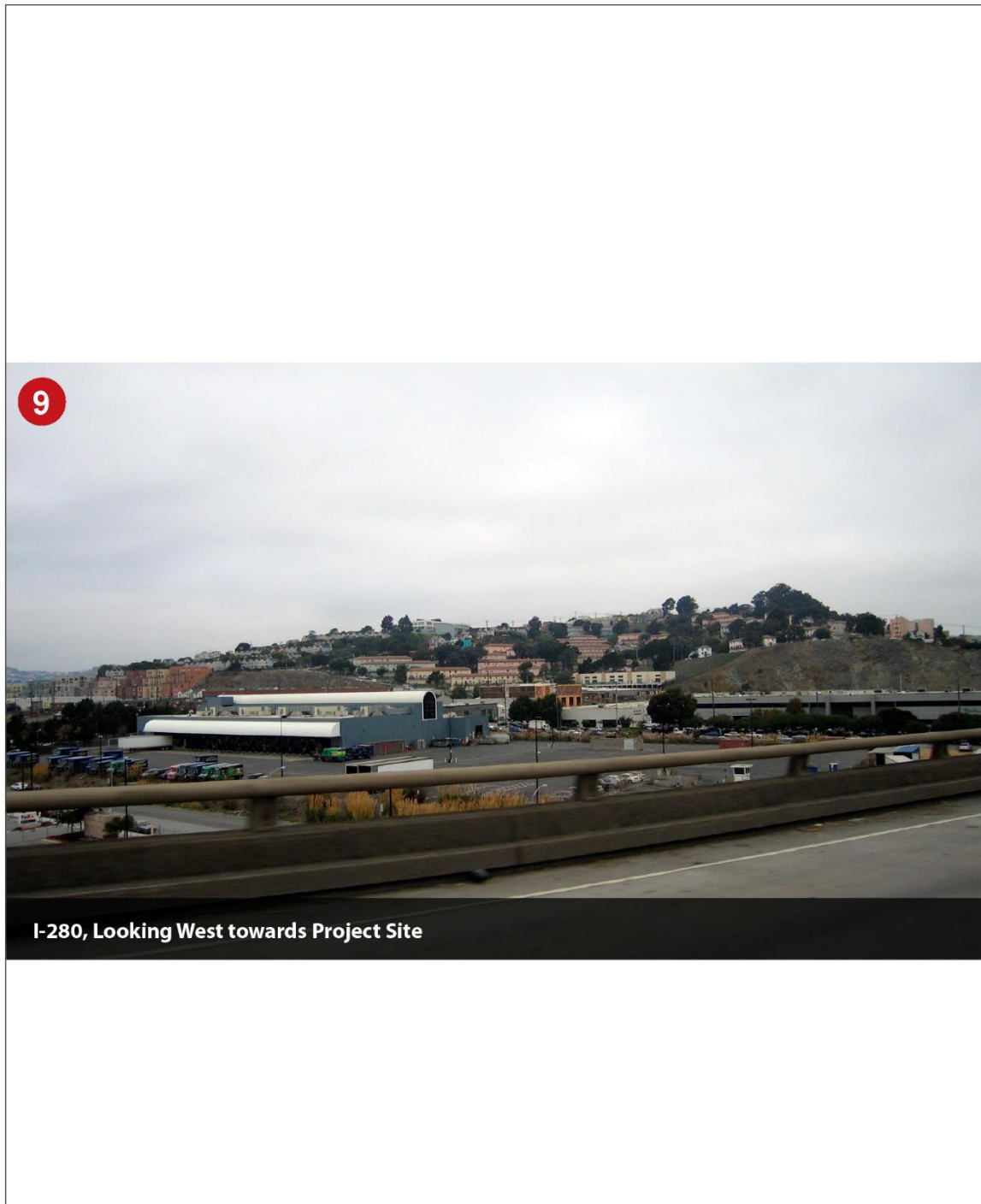
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-8: EXISTING VIEWS (VIEWPOINTS 5 AND 6)





SOURCE: Van Meter Williams Pollack LLP, 2012.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 4.3-9: EXISTING VIEWS (VIEWPOINTS 7 AND 8)



SOURCE: Van Meter Williams Pollack LLP, 2012.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 4.3-10: EXISTING VIEWS (VIEWPOINT 9)**



**Potrero Hill Recreation Center.** The Potrero Hill Recreation Center is a 9.6-acre facility owned and operated by the San Francisco Recreation and Parks Department. This park includes a playground, baseball field, basketball court, dog play area, ball fields, two lighted tennis courts, picnic tables, and a recreation center with a gymnasium, stage, and auditorium.<sup>7</sup> The Recreation Center is surrounded by a chain-link fence and dense mature trees, and sits atop a high retaining wall. Due to these features and the higher elevation, the Recreation Center is not a dominant characteristic visible from the lower neighborhood and the Project site. From the upper portion of the Project site, along 23<sup>rd</sup> Street, only the perimeter chain-link fence, mature trees, and retaining walls associated with the Recreation Center are visible. In addition, since the Recreation Center is uphill from the Terrace and Annex housing developments and features dense vegetation along the eastern perimeter, the existing buildings are not currently visible to park users.

Scenic vistas Due to the views of the Bay and surrounding hills are present at from certain portions of this public location (in particular, from the eastern and southern perimeter), users of the Potrero Hill Recreation Center are currently afforded a scenic vista. Although these views are not formally designated as scenic vistas, they are popularly used and appreciated areas of aesthetics or recreational significance at the local level.

~~As shown in Figure 4.3-2A (Viewpoint 1), the northern portion of the Recreation Center includes natural features and a path toward 22<sup>nd</sup> Street. Looking east, a channelized view of the Bay and East Bay Hills is provided through the dense vegetation. Figure 4.3-2B (Viewpoint 2) includes a view from the southern portion of the Recreation Center at the baseball field. Long range views are limited due to the chain link fence and dense vegetation. However, intermittent long range views of the surrounding higher elevations to the south can be seen from this location, including McLaren Ridge and San Bruno Mountain. As shown in Figure 4.3-2A and Figure 4.3-2B, the Project site is not visible from most locations within the park; the rooftops of existing buildings are only visible by users of the Recreation Center along the immediate perimeter, through the chain link fence and dense vegetation. Figures 4.3-2 and 4.3-3 (Viewpoint 1A, 1B, and 1C) show the existing views from the 22<sup>nd</sup> Street Trail north of the Recreation Center. Middleground features include the surrounding urban industrial and residential development at lower elevations and dense vegetation along the perimeter of the trail. Background views of the Bay and the East Bay Hills, beyond, are provided looking north to southeast. Views looking along the trail (View 1C) south are mostly limited to the foreground by existing Potrero Annex buildings and dense vegetation along the edges of the trail. Middleground and background views of the Bay and the East Bay Hills, beyond, are not available looking in this direction (View 1C). However, intact, vivid, and largely unobstructed views of downtown San Francisco's skyline are offered looking north, that contribute to the panoramic nature of the views from the 22<sup>nd</sup> Street Trail. There is a moderate level of visual intactness between the natural areas (the Bay and East Bay Hills) and developed landscape looking southeast. Although the portions of the~~

<sup>7</sup> City and County of San Francisco, San Francisco Recreation and Parks Department. *Full Service Rec Centers: Potrero Hill Recreation Center*. Available: <<http://sfrecpark.org/Rec-RecCenters.aspx#/i=2>>. Accessed: May 7, 2012.

built environment blend into the overall surrounding character, some elements of existing development (at Potrero Annex) visually encroach onto the natural landscape pattern of the Bay and East Bay Hills resulting in a visual discontinuity and disruption. While views from Viewpoint 1C do not contribute greatly, views from Viewpoints 1A and 1B form a vivid and distinctive panoramic visual pattern. Visual quality is considered high from this location and viewer sensitivity to changes in views from the trail would also be high.

As shown in Figure 4.3-3 (Viewpoint 1D), the existing development at Potrero Annex is not readily visible in views looking east from the bench below the tennis courts. Middleground and background views of the surrounding Bay and East Bay Hills, rather, are the focal point in views that are available through gaps in the hillside vegetation. Visual quality is considered moderate from this location due to obscured views and viewer sensitivity to changes in views looking east would be moderately high.

Figures 4.3-4 through 4.3-6 (Viewpoints 2A through 2F) show existing views to the south and east from the playfields at the Potrero Hill Recreation Center. Viewpoints 2A, 2B, and 2C (Figures 4.3-4 and 4.3-5) show the existing views from looking south from various points on the playfields. Although partially blocked by the chain-linked fence, dense vegetation along the perimeter of the Recreation Center, and utility pole and wires, long-range views of the surrounding higher elevations to the south can be seen from these locations, including McLaren Ridge and the San Bruno Mountain. These locations offer relatively intact views of the McLaren Ridge and San Bruno Mountain. Views from the playfields offer distinctive patterns and moderately defined landscapes. Some elements of the existing development visually encroach onto the natural landscape pattern of the McLaren Ridge and the San Bruno Mountain resulting in a visual disruption, but the majority of the natural landscape area rises above the manmade development and visual order is maintained. Visual quality is considered moderately high from this location and viewer sensitivity to changes in views from the Potrero Hill Recreation Center would also be high. However, such views are common in the Project vicinity and the surrounding Bay area.

As shown in Figures 4.3-5 and 4.3-6 (Viewpoints 2D, 2E, and 2F), views looking east from the playfields show adjacent vegetation with long-range views of the East Bay Hills beyond. Development that is present to the east of the Potrero Hill Recreation Center is not visible from these viewpoints due to the steep slope on the eastern edge of the playfields. Visual quality is considered moderately high from this location and viewer sensitivity to changes in views looking east from the playfields would also be high. However, such views are common in the Project vicinity and the surrounding Bay area.

**Local Streets Surrounding the Project Site.** According to the Urban Design Element of the General Plan, views along streets should be protected, especially when the Bay is visible.<sup>8</sup> Figure 4.3-3A-7 through Figure 4.3-5A-9 (Viewpoints 3 through 7), represent viewpoints along Wisconsin Street. View

<sup>8</sup> City and County of San Francisco, *San Francisco General Plan, Urban Design Element* (adopted December 7, 2010). Available: <[http://www.sf-planning.org/ftp/General\\_Plan/I5\\_Urban\\_Design.htm](http://www.sf-planning.org/ftp/General_Plan/I5_Urban_Design.htm)>. Accessed: May 7, 2012.

corridors are present toward San Bruno Mountain and the Bay, usually when traveling downhill; however, view corridors in the Project vicinity tend to be highly channelized by mature trees and development along the roadway corridor, with a high presence of utility lines, as seen in Viewpoints 43 through 7. Views from these locations are not considered scenic because such views are very common to the Project vicinity and do not contain uniquely vivid visual elements.

From the corner of Wisconsin Street and 23<sup>rd</sup> Street at Viewpoints 3 and 4 (Figure 4.3-~~3A-7A~~7A and B), views of the existing housing development at the Terrace site are also available but views are limited to a few rooftops due to the hillside. ~~Views of the Bay and other long range views facing east are limited and views of San Bruno Mountain and Candlestick Hill are channelized due to buildings, mature vegetation, and utility lines.~~

Figure 4.3-~~4A-8A~~8A (Viewpoint 5) shows the existing view from the corner of Wisconsin Street and Coral Road, facing east. The dominant features visible from this viewpoint are the mature trees at the Terrace site, but the view also includes street pavement and overhead wires, along with partially blocked views of the buildings at the Terrace site and the Bay. A view corridor of the Bay is visible between existing vegetation and the buildings at the Project site. This vantage point also represents the view from Starr King Elementary School.

Further down the street at the corner of Wisconsin Street and 25<sup>th</sup> Street, views of the Bay are more prominent as seen in Figure 4.3-8B (Viewpoint 6). Views of the Bay and nearby manmade features, such as the cranes associated with the San Francisco Port operations, are visible but are ~~still~~ partially blocked by vegetation, utility poles and wires, and foreground and middleground development. ~~Figure 4.3-4B (Viewpoint 6) depicts the views of the Bay and nearby manmade features, such as the shipping cranes at Hunters Point Shipyard.~~ The dense, single-family and multifamily units along 25<sup>th</sup> Street, which are not part of the Project site, are also visible in the foreground. The East Bay Hills provide background views on clear days. Looking south from Viewpoint 7, as shown in Figure 4.3-~~5A-9A~~9A, the Project site is visible to the east although no existing housing units can be seen due to the topography. Also in the foreground, to the west, are the townhouses of the Parkview Heights development. Although mainly blocked by dense vegetation, some of the townhome façades and entry staircases are visible. Further to the south, the area provides channelized views of the industrial development at the base of Potrero Hill, I-280, Mount St. Joseph, Candlestick Hill, and San Bruno Mountain.

Figure 4.3-~~5B-9B~~9B (Viewpoint 8) shows the existing interior view of the Project site looking north at Cesar Chavez Street and Connecticut Street. Due to the steep terrain, several Terrace buildings are visible and appear to be staggered on the hillside between mature trees. To the west of Connecticut Street, the buildings seem denser, with no mature trees between the housing units. However on the east side of Connecticut Street, the buildings are more intermittently spaced, with dense trees between the structures, blocking several buildings from view. Although the Project site is highly visible from this location, it would not be considered a sensitive viewer location since the area consists of

warehouses and industrial uses with no housing units present. In addition, views looking south (away from the Project site) are relatively level until Cesar Chavez Street, providing no views of the Bay or other significant natural features. Although there is a drop in elevation to the south of Cesar Chavez, no scenic views are held from Viewpoint 8, looking south.

Viewpoints 3 through 8 represent views that are very common to the Project vicinity, do not contain elements that constitute a uniquely vivid view, and contain detracting visual elements such as many utility lines. Therefore, views from these locations are considered to have moderate visual quality. Viewer sensitivity is considered moderately high because while no scenic views are seen from these locations, viewers are likely to have a high sense of ownership over the local landscape and associated views.

**I-280.** I-280 is designated as an eligible state scenic highway from the State Route (SR) 17 interchange in San Jose to the I-80 interchange in San Francisco under the state's Scenic Highway Program.<sup>9</sup> Scenic highways are highways that traverse land with unique or outstanding scenic quality or provide access to regionally significant scenic and recreational areas.

Unobstructed views of the Annex site are visible from southbound and northbound I-280 near Pennsylvania Avenue and 23<sup>rd</sup> Street. Industrial and warehouse buildings and storage units are located at the base of Potrero Hill in this area. The hill rises almost vertically above the industrial parcels and the housing units are perched within the hillside, towards the top. Behind the Annex Site, the extremely mature, dense trees at the Potrero Hill Recreation Center are visible. To the south of the Annex site, a few of the higher elevation Terrace buildings can be seen behind tall trees. Figure 4.3-6 10 (Viewpoint 9) shows the interior view of the Project site from Pennsylvania Avenue and 23<sup>rd</sup> Street. This view is similar from I-280 except in this location the housing development is more level with the viewer's line-of-sight and the utility poles and wires are not a dominant feature.

The Terrace site is also visible from I-280, but due to its south-facing direction on the hillside, it is not immediately visible to motorists. Southbound vehicles do not have a direct view of the Terrace site since warehouse buildings and other residential development blocks the site. Once the site is visible, the motorists are driving away from the site. Northbound vehicles have direct views of the Project site, but due to distance and intervening development, topography, and vegetation, the Terrace site blends with its surroundings and is not a dominant feature. The visual quality of views toward the Project site are considered moderate from this location and, because viewers are traveling past the Project site at high rates of speed and with brief views of the Project site, viewer sensitivity to changes at the Project site is considered moderately low.

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<sup>9</sup> California Department of Transportation, Scenic Highway Program, *Eligible (E) and Officially Designated (OD) Routes*. Available: <<http://www.dot.ca.gov/hq/LandArch/scenic/cahisys4.htm>>. Accessed: May 7, 2012).

## 4.13 UTILITIES AND SERVICE SYSTEMS

The text on page 4.13-1 has been revised as follows:

According to the 2010 San Francisco Urban Water Management Plan (UWMP), which was adopted by the San Francisco Public Utilities Commission (SFPUC) on June 14, 2011, nearly 2.56 million people rely on water supplied by the SFPUC water system to meet their daily water needs, including wholesale customers in the Peninsula, South Bay, and Easy Bay communities. San Francisco customers, or “in-City” customers, include those within the City and County of San Francisco. The Regional Water System (RWS) consists of over ~~280~~ 390 miles of pipeline, over ~~60~~ 74 miles of tunnels, 11 reservoirs, five pump stations, and two water treatment plants located outside the city (the RWS) and over ~~1,250~~ 1,235 miles of pipeline, ~~12~~ 11 reservoirs, ~~nine~~ eight storage tanks, and ~~17~~ 22 pump stations located within the city limits. Water supplies to the in-city distribution system from the RWS are currently limited to an average annual supply of 265 million gallons per day (mgd). The SFPUC provides water to both retail (residents, businesses, and industries within the corporate boundaries of the city) and wholesale customers. The RWS draws approximately 85 percent of its water from the Upper Tuolumne River Watershed. Water is collected in the Hetch Hetchy Reservoir in Yosemite National Park, fed into an aqueduct system, and then conveyed water 167 miles by gravity, and ultimately delivered to Bay Area reservoirs and customers. The remaining water supply (approximately 15 percent) is drawn from local surface waters in the Alameda and Peninsula.

The contents of table 4.13-1 on page 4.13-3 have been deleted and replaced to reflect latest SFPUC water supply projections found in the 2013 Water Availability Study for the City and County of San Francisco.

**Table 4.13-1 SFPUC Retail Water Demand (mgd)**

Users, Facilities, and Entities	Projected Water Demand						
	2005 <sup>a</sup>	2010 <sup>a</sup>	2015	2020	2025	2030	2035
<b>In-City Customers</b>							
Single-Family Residential <sup>b</sup>	18.4	16.4	17.9	17.1	16.5	16.0	15.8
Multi-Family Residential <sup>b</sup>	27.7	25.1	28.9	28.4	28.2	28.3	28.6
Non-Residential <sup>b</sup>	24.8	23.5	25.6	26.5	27.5	28.7	29.9
Other In-city Demands <sup>b,c</sup>	0.2	0.1	0.2	0.2	0.2	0.2	0.2
Losses <sup>d</sup>	8.2	6.3	5.0	4.9	5.0	5.0	5.1
<i>In-city Subtotal<sup>b</sup></i>	<i>79.3</i>	<i>71.4</i>	<i>77.7</i>	<i>77.1</i>	<i>77.3</i>	<i>78.2</i>	<i>79.7</i>
<b><i>In-city Subtotal w/Conservation<sup>f</sup></i></b>	<b><i>79.3</i></b>	<b><i>71.4</i></b>	<b><i>73.6</i></b>	<b><i>71.7</i></b>	<b><i>71.2</i></b>	<b><i>72.1</i></b>	<b><i>73.7</i></b>
<b>Suburban Retail Customers<sup>g</sup></b>							
Other Retail Customers <sup>b</sup>	4.4	3.0	3.8	3.8	3.8	3.8	3.8
Lawrence Livermore Lab	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Groveland CSD	0.4	0.7	0.8	0.8	0.8	0.8	0.8
<b><i>Suburban Retail Subtotal<sup>g</sup></i></b>	<b><i>5.2</i></b>	<b><i>4.1</i></b>	<b><i>5.0</i></b>	<b><i>5.0</i></b>	<b><i>5.0</i></b>	<b><i>5.0</i></b>	<b><i>5.0</i></b>
<b>Groundwater Customers</b>							
City Irrigation Demand <sup>i</sup>	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Castlewood Community Demand <sup>j</sup>	0.7	0.7	0.7	0.7	0.7	0.7	0.7
<i>Groundwater Subtotal</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>	<i>2.2</i>
<b><i>Total Retail Demand<sup>k</sup></i></b>	<b><i>86.7</i></b>	<b><i>77.7</i></b>	<b><i>80.7</i></b>	<b><i>78.9</i></b>	<b><i>78.5</i></b>	<b><i>79.2</i></b>	<b><i>80.9</i></b>

SOURCE: San Francisco Public Utilities Commission. 2011. 2010 Urban Water Management Plan for the City and County of San Francisco. Table 12, p. 36.

- a. 2005 and 2010 data are based on actual billing data (SFPUC, 2010). 2015–2035 are projections from the SFPUC Retail Demand Model Update and Calibration Technical Memorandum (April 2014).
- b. 2005 and 2010 data are based on actual billing data (SFPUC, 2010). 2015–2035 are projections from the SFPUC Retail Demand Model Update and Calibration Technical Memorandum (April 2014).
- c. Builders and Contractors, Docks & Shipping
- d. Losses reported for 2005 and 2010 include meter under registration. Losses in 2015–2035 exclude meter under registration because they are included in the retail demand projections for residential and non-residential sectors. Meter under registration losses estimated at 2.2% of residential and 2.1% of non-residential sector demands. System losses excluding meter under registration estimated at 6.86% of sector demand.
- e. “In-City subtotal” refers to demand that includes code-driven savings from changes in state and federal plumbing codes and regulations.
- f. “In-City Subtotal with Conservation” refers to demand that includes code-driven savings plus savings from SFPUC-initiated conservation programs.
- g. Suburban retail customer future demands do not include active conservation savings. The SFPUC plans on working with the suburban Retail Customers on conservation activities, but has not yet quantified the savings. Accordingly, demands are kept constant through 2035, but will be adjusted as more information becomes available.
- h. The San Francisco County Jail, San Francisco International Airport, and other suburban or municipal accounts.
- i. Irrigation at Golden Gate Park, the Great Highway median, and the San Francisco Zoo.
- j. 100% of Castlewood demand (0.4 mgd) is met by groundwater wells in Pleasanton and 75% of Sunol Golf course demand (0.3 mgd) met by subsurface diversions of surface water at the Sunol Filter Galleries. Projected demands are based on average use from 2000–2010 and remain unchanged over the 25-year planning horizon.
- k. This refers to the sum of “in-City subtotal with conservation”, suburban retail subtotal, and groundwater subtotal.

<b>Table 4.13-1 SFPUC Retail Water Demand (mgd)</b>						
<b><i>Users, Facilities, and Entities</i></b>	<b><i>Projected Water Demand</i></b>					
	<b><i>2012<sup>a</sup></i></b>	<b><i>2015</i></b>	<b><i>2020</i></b>	<b><i>2025</i></b>	<b><i>2030</i></b>	<b><i>2035</i></b>
<b><u>In-City Customers</u></b>						
Single-Family Residential <sup>b</sup>	<u>16.1</u>	<u>17.9-16.7</u>	<u>15.5</u>	<u>14.8</u>	<u>14.4</u>	<u>14.3</u>
Multi-Family Residential <sup>b</sup>	<u>24.9</u>	<u>28.9-28.1</u>	<u>27.7</u>	<u>27.6</u>	<u>27.9</u>	<u>28.6</u>
Non-Residential <sup>b</sup>	<u>23.2</u>	<u>25.6-26.5</u>	<u>27.7</u>	<u>27.5</u>	<u>27.7</u>	<u>28.7</u>
Other In-city Demands <sup>d,g</sup>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>
In-City Irrigation Uses	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>
Losses <sup>b,c</sup>	<u>6.9</u>	<u>5.0-5.1</u>	<u>5.2</u>	<u>5.2</u>	<u>5.2</u>	<u>5.3</u>
<i>In-city Subtotal<sup>e</sup></i>	<u>72.8</u>	<u>77.7-78.1</u>	<u>77.8</u>	<u>76.8</u>	<u>76.9</u>	<u>78.6</u>
<b><u>Suburban Retail Customers</u></b>						
Single Family Residential <sup>h</sup>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>
Non-Residential <sup>h</sup>	<u>3.7</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>	<u>4.3</u>
Hetch Hetchy Water and Power Customers <sup>f,g</sup>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>	<u>1.2</u>
<b><i>Suburban Retail Subtotal</i></b>	<u>5.0</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>	<u>5.6</u>
<b><i>Total Retail Demand<sup>k</sup></i></b>	<u>77.8</u>	<u>83.7</u>	<u>83.4</u>	<u>82.4</u>	<u>82.5</u>	<u>84.2</u>

SOURCE: San Francisco Public Utilities Commission, 2013, *2013 Water Availability Study for the City and County of San Francisco* May, Table 6, p. 17.

- a. 2012 data are based on actual billing data.
- b. 2015-2035 projections were generated using the SFPUC Retail Demand Model and include savings from passive and active conservation.
- c. Losses reported for 2012 include meter under-registration. Losses for 2015-2035 exclude meter under registration because they are included in the retail demand projections for residential and non-residential sectors. Meter under-registration losses are estimated at 2.2% of residential and 2.1% of non-residential sector demands. System losses excluding meter under-registration are estimated at 6.86% of sector demand.
- d. Builders and Contractors, Docks and Ships.
- e. Irrigation at Golden Gate Park, the Great Highway, and the San Francisco Zoo.
- f. Hetch Hetchy Water & Power Customers include Lawrence Livermore National Laboratory, Groveland Community Services District and other incidental uses.
- g. 2015-2035 projections are based on average historic consumption, which has remained relatively constant over the past 20 years.

The contents of table 4.13-2 on page 4.13-4 have been deleted and replaced to reflect latest SFPUC water supply projections found in the 2013 Water Availability Study for the City and County of San Francisco.

**Table 4.13-2 SFPUC Retail Water Supply**

<i>Current and Future Water Supply Sources</i>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
RWS Watersheds—Retail Supply <sup>a</sup>	81.0	81.0	81.0 <sup>a</sup>	81.0 <sup>a</sup>	81.0 <sup>a</sup>	81.0 <sup>a</sup>
Groundwater Sources: <sup>b</sup>						
■ Groundwater (In-city Irrigation Purposes)	1.5	1.5	0.3	0.3	0.3	0.3
■ Groundwater at Castlewood	0.7	0.7	0.7	0.7	0.7	0.7
■ Groundwater Treated for Potable—Previously used for In-city Irrigation Purposes	0.0	0.0	1.2	1.2	1.2	1.2
<i>Groundwater Subtotal</i>	2.2	2.2	2.2	2.2	2.2	2.2
<b><i>Current Water Supply Subtotal</i></b>	<b>83.2</b>	<b>83.2</b>	<b>83.2</b>	<b>83.2</b>	<b>83.2</b>	<b>83.2</b>
Future Water Supply Sources:						
■ Groundwater Potable from North Westside Groundwater Basin	0.0	2.8	2.8	2.8	2.8	2.8
■ Recycled Water	0.0	0.3	4.0	4.0	4.0	4.0
<i>Future Supply Subtotal</i>	0.0	3.1	6.8	6.8	6.8	6.8
<b><i>Total Supply</i></b>	<b>83.2</b>	<b>86.3</b>	<b>90.0</b>	<b>90.0</b>	<b>90.0</b>	<b>90.0</b>

SOURCE: San Francisco Public Utilities Commission. 2011. *2010 Urban Water Management Plan for the City and County of San Francisco*. June. Table 11, p. 30.

a. Assumes 2018 supply limitation extends to 2035.

b. Groundwater currently serves irrigation to Golden Gate Park, the San Francisco Zoo, and the Great Highway median. A groundwater reserve of 0.3 mgd for irrigation purposes will remain as part of the SFPUC's non-potable groundwater supply (SFPUC 2008 Phased WSIP Variant). Castlewood and Sunol projected supplies remain unchanged over the 20-year planning horizon.



<b>Table 4.13-2 SFPUC Retail Water Supply</b>					
<u>Current and Future Water Supply Sources</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
<b>Existing Supply Sources</b>					
<u>RWS Watersheds—Retail Allocation</u>	<u>81.0</u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>	<u>81.0<sup>a</sup></u>
<u>Suburban Groundwater and Subsurface Diversions:<sup>a</sup></u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>	<u>0.7</u>
<u>North Westside Groundwater Basin<sup>b</sup></u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>	<u>1.5</u>
<u>Recycled Water – Harding Park and Sharp Park</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>
<b><u>Existing Supplies Subtotal</u></b>	<b><u>83.5</u></b>	<b><u>83.5</u></b>	<b><u>83.5</u></b>	<b><u>83.5</u></b>	<b><u>83.5</u></b>
<b>Future Water Supply Sources<sup>c</sup></b>					
<u>Future North Westside Groundwater Basin Expansion<sup>b</sup></u>	<u>0.0</u>	<u>2.8</u>	<u>2.8</u>	<u>2.8</u>	<u>2.8</u>
<u>Future Recycled Water Projects</u>	<u>0.0</u>	<u>2.0</u>	<u>4.0</u>	<u>4.0</u>	<u>4.0</u>
<b><u>Future Supply Subtotal</u></b>	<b><u>0.0</u></b>	<b><u>4.8</u></b>	<b><u>6.8</u></b>	<b><u>6.8</u></b>	<b><u>6.8</u></b>
<b><u>Total Supply</u></b>	<b><u>83.5</u></b>	<b><u>88.3</u></b>	<b><u>90.3</u></b>	<b><u>90.3</u></b>	<b><u>90.3</u></b>

SOURCE: San Francisco Public Utilities Commission. 2013. *2013 Water Availability Study for the City and County of San Francisco*. May, Table 6, p. 13.

- These sources consist of groundwater use at Castlewood (not connected to RWS) of approximately 0.4 mgd, and subsurface diversions to Sunol Golf of approximately 0.3 mgd taken from the Sunol Infiltration Gallery
- The North Westside Groundwater Basin is currently used for irrigation. In-City groundwater use will be expanded for potable use with the San Francisco Groundwater Supply Project. Approximately 1.2 mgd of existing groundwater use will be converted to potable use (for a total of 4.0 mgd) once the Westside Recycled Water project is completed as a substitute irrigation water supply
- The implementation of proposed future supply sources is contingent on completion of necessary project level environmental review and project approval. If these supplies are not available as planned, and if retail demand exceeds the available water supply, the Water Supply Agreement allows the SFPUC to import additional water from the RWS, with mitigation implemented by the SFPUC and potential environmental surcharges if RWS deliveries exceed the 265 mgd interim supply limitation. (Total RWS deliveries in FY11/12 were 219.4 mgd.)

## 5.3 VISUAL QUALITY/AESTHETICS

### 5.3.1 Regulatory Framework

Please refer to Chapter 3, *Plans and Policies*, for a complete discussion of relevant plans and their respective applications to the implementation of the Proposed Project and alternatives. Policies most relevant to this analysis are presented below.

#### ■ Federal

U.S. Department of Housing and Urban Development (HUD) has issued guidance on assessing the impact of a proposed action on scale and urban design. In accordance with the Council on Environmental Quality (CEQ) 40 Code of Federal Regulations (CFR) Section 15008.27, this guidance should be used in assessing the intensity of a proposed action and is discussed further below.

## ■ State

### **Senate Bill 743 and Public Resources Code 21099**

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 added Section 21099 to the Public Resources Code and eliminated the analysis of aesthetics impacts for certain urban infill projects under the California Environmental Quality Act (CEQA). The Proposed Project meets the definition of a mixed-use residential project on an infill site located within a transit priority area as specified by Section 21099. Accordingly, from a CEQA perspective, aesthetics impacts are discussed for informational purposes. Regardless, since the Proposed Project and alternatives are subject to NEPA, aesthetics effects are considered in this analysis.

## ■ Local

### **San Francisco General Plan**

The *San Francisco General Plan* (General Plan), adopted by the Planning Commission and the Board of Supervisors, is the embodiment of the City's collective vision for the future of San Francisco. The General Plan is comprised of a series of elements that applies Citywide. The element that applies to visual quality is the Urban Design Element; however, the Environmental Protection, and Recreation and Open Space Elements also contain applicable objectives and policies, as outlined in Chapter 3, *Plans and Policies*.

### **San Francisco Planning Code**

The *Planning Code*, which incorporates by reference the City's zoning maps, implements the General Plan and governs permitted uses, densities, and configuration of buildings within the City. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) the Proposed Project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are approved as part of the project. The *Planning Code* provides location-specific development and use regulations that govern density and configuration of buildings.

Per the *Planning Code*, the Project site is currently zoned RM-2. Under Section 206.2 of the *Planning Code*, RM-2 is defined as Residential, Mixed-Use – Moderate Density. RM-2 Districts are generally similar to RM-1 Districts, which contain a mixture of dwelling types including those found in the RH (Residential, House) Districts and apartment buildings in a variety of structures and a range of unit sizes. RM-2 Districts tend to be greater in unit density and the variety of building types and unit sizes are often more pronounced than RM-1 Districts. The Project site is within a 40-X Height and Bulk District which sets building height limits at 40 feet, with no bulk restriction. Properties in the Project vicinity (several blocks to the east, west, and north of the Project site, with some exceptions) are also in the 40-X Height and Bulk District, which follows the pattern of residential uses. Properties to the

south are in the 65-J Height and Bulk Districts, which follows the pattern of industrial/commercial uses.

### ***Public Works Code Article 16, Urban Forestry Ordinance***

The Urban Forestry Ordinance establishes protections for the City's trees. The two categories receiving the highest protection are the City's Significant and Landmark Trees. The City currently considers Significant Trees to be street trees and private trees that meet certain criteria under Section 810A of the Public Works Code. Removal of any of these trees requires a permit. Landmark Trees have the highest level of protection in the City. These are trees that meet criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character and have been found worthy of Landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. Temporary landmark status is also afforded to nominated trees currently undergoing the public hearing process.

### ***Additional Applicable Provisions***

The San Francisco Planning Code contains a number of provisions to reduce or prevent light and glare in the City. This includes Section 311 and the Residential Design Guidelines, Section 312, and the Neighborhood Commercial Design Guidelines, as well as the Industrial Area Design Guidelines. Moreover, Planning Commission Resolution 9212 prohibits the use of mirrored or reflective glass.

## **5.3.2 Impacts and Mitigation Measures**

### **■ Significance Thresholds**

#### ***Significance Criteria under CEQA***

The Proposed Project is subject to SB 743 and Section 21099 of the Public Resources Code, which eliminated the analysis of aesthetics impacts for certain urban infill projects under CEQA. Accordingly, this section does not provide CEQA conclusions regarding aesthetics.

#### ***Context and Intensity Evaluation Guidelines under NEPA***

The following thresholds for determining the significance of visual quality impacts in this analysis are consistent with NEPA. Implementation of the Proposed Project and its alternatives would have a significant effect on visual quality if it would:

- Block or disrupt views of scenic resources or reduce public opportunities to view scenic resources.
- Introduce elements that are out of character or scale with the existing physical environment or that detract from the aesthetic appeal of the surrounding area. Specifically:
  - Conform to the surrounding and established built environment, in terms of overall scale, density, size, and mass.
  - Introduce elements out of character or scale with the existing physical environment.

- Introduce elements that represent a significant change in size, scale, placement, or height in relation to neighboring structures in an inappropriate manner.
  - Introduce changes to building density in the community.
  - Introduce changes resulting from induced development regarded by the community as beneficial or negative.
  - Affect the relationship of Project design to the context of its surroundings
  - Reduce or detrimentally increase levels of activity and enhancement of street-level activity and community interaction.
  - Propose signage and street furniture that is inconsistent with existing architectural styles.
- Alter the land form by demonstrably destroying or altering the natural or man-made environment.
  - Not conform to locally adopted design guidelines.

## ■ Approach to Analysis

This analysis focuses on the visual effects of the Proposed Project and its alternatives. Most alternatives (with the exception of the No Project Alternative) include removal of the existing Terrace and Annex buildings and construction of new buildings. The analysis includes the impacts associated with height and density increases, tree removal, and changes in views to and from the Project site. The section assesses the potential visual effects based on field reconnaissance and the review of photographs of existing conditions from key viewpoints.

Pursuant to NEPA regulations (40 CFR 1500–1508), project effects are evaluated based on the criteria of context and intensity. Context means the affected environment in which a proposed project occurs. The severity of the effect is examined in terms of the type, quality, and sensitivity of the resource involved; the location and extent of the effect; the duration of the effect (short- or long-term) and other consideration of context. Intensity means the degree or magnitude of an impact that is thus determined to be no impact, less than significant, or less than significant with mitigation. In identifying visual resources and analyzing project effects on the visual environment, the analysis considers the HUD guidance (as discussed above) in determining context and intensity and analyzes the change in visual conditions as well as the viewer's response to the change.

Visual simulations have been prepared and employed to determine potential effects. The visual simulations are based on a massing study. Building articulation is demonstrative, and the simulations provide existing and representative post-construction views from nine selected vantage points, as shown in Figure 4.3-1. The Planning Department selected the nine vantage points based on those identified during the scoping process and considered to be sensitive viewer locations, which include parks, publicly accessible buildings, and sidewalks that offer a view of the urban and natural landscapes making up a viewshed. As described below, Viewpoints 1 and 2 represent views from a scenic vista, in this case, from the Potrero Hill Recreation Center. Viewpoints 3 through 8 represent

public views of the Project site from outside the Project site. Viewpoint 9 represents a view from a state scenic highway, in this case I-280.

The following analysis includes visual simulations for both the Proposed Action and Alternative 1. Visual simulations were not prepared for Alternative 2 because this alternative would result in the same density, height, and bulk as existing conditions. Although the existing housing units would be demolished and replaced with new units, the same site plan and building pattern would result. As such, visual simulations were only prepared for the Proposed Action and Alternative 1.

However, several of the vantage points would result in relatively similar views under both the Proposed Project and the Housing Replacement since the building heights in these areas would be the same. Or, if the building heights differ slightly, due to distance and topography from these vantage points, the difference in a 10-foot reduction is barely perceptible. As such, Table 5.3-1 summarizes the vantage point locations that would result in the same views and are included as one figure for both scenarios, and the vantage points that have different views and, therefore, are presented in different figures.

<i>Viewpoint</i>	<i>Location</i>	<i>Same View for Both Scenarios?</i>	<i>Figure #</i>
1	22 <sup>nd</sup> St Trail	Yes	<u>Figure 5.3-1</u> <u>Figure 5.3-4 through 5.3-3</u>
2	Potrero Hill Recreation Center, looking south	No	<u>Figure 5.3-2</u> <u>Figure 5.3-5 through 5.3-7</u> / <u>Figure 5.3-10</u> <u>Figure 5.3-16</u>
3	23 <sup>rd</sup> St at Wisconsin St, looking east	Yes	<u>Figure 5.3-3</u> <u>Figure 5.3-9</u>
4	Wisconsin St at 23 <sup>rd</sup> St, looking south	Yes	<u>Figure 5.3-4</u> <u>Figure 5.3-10</u>
5	24 <sup>th</sup> St at Wisconsin St, looking east	No	<u>Figure 5.3-5</u> <u>Figure 5.3-11</u> / <u>Figure 5.3-14</u> <u>17</u>
6	Wisconsin St at 25 <sup>th</sup> St, looking east	Yes	<u>Figure 5.3-6</u> <u>Figure 5.3-12</u>
7	Wisconsin St at 25 <sup>th</sup> St, looking south	Yes	<u>Figure 5.3-7</u> <u>Figure 5.3-13</u>
8	Connecticut St at Cesar Chavez St, looking north	No	<u>Figure 5.3-8</u> <u>Figure 5.3-14</u> / <u>Figure 5.3-18</u> <u>18</u>
9	I-280, looking northwest	No	<u>Figure 5.3-9</u> <u>Figure 5.3-15</u> / <u>Figure 5.3-19</u> <u>19</u>

To provide additional clarity Table 5.3-1<sup>2</sup> includes a summary of the figures and associated viewpoints discussed in this section.

<i>Figure</i>	<i>ID</i>	<i>Location</i>	<i>Description</i>
<u>5.3-1</u>	<u>1A</u>	<u>22<sup>nd</sup> Street Trail</u>	<u>Existing looking north</u>
			<u>Proposed looking north</u>
<u>5.3-2</u>	<u>1B</u>		<u>Existing looking southeast</u>
			<u>Proposed looking southeast</u>

**Table 5.3-2 List of Figures and Viewpoints**

<i>Figure</i>	<i>ID</i>	<i>Location</i>	<i>Description</i>
<u>5.3-3</u>	<u>1C</u>		<u>Existing looking south</u>
			<u>Proposed looking south</u>
<u>5.3-4</u>	<u>1D</u>	<u>Bench below tennis courts</u>	<u>Existing looking east</u>
			<u>Proposed looking east</u>
<u>5.3-5</u>	<u>2A</u>	<u>Potrero Hill Recreation Center</u>	<u>Existing looking south from northern edge of playfields</u>
			<u>Proposed looking south from northern edge of playfields</u>
			<u>Mitigated looking south from northern edge of playfields</u>
<u>5.3-6</u>	<u>2B</u>		<u>Existing looking south from middle of playfields</u>
			<u>Proposed looking south from middle of playfields</u>
			<u>Mitigated looking south from middle of playfields</u>
<u>5.3-7 and 5.3-16</u>	<u>2C</u>		<u>Existing looking south from southern edge of playfields</u>
			<u>Proposed and Alternative 1 looking south from southern edge of playfields</u>
			<u>Mitigated looking south from southern edge of playfields</u>
<u>5.3-8</u>	<u>2D</u>	<u>Proposed looking east from eastern edge of playfields</u>	
	<u>2E</u>	<u>Proposed looking east from middle of playfields</u>	
	<u>2F</u>	<u>Proposed looking east from northwestern edge of playfields</u>	
<u>5.3-9</u>	<u>3</u>	<u>23<sup>rd</sup> Street and Wisconsin Street</u>	<u>Existing looking east</u>
			<u>Proposed looking east</u>
<u>5.3-10</u>	<u>4</u>		<u>Existing looking south</u>
			<u>Proposed looking south</u>
<u>5.3-11 and 5.3-17</u>	<u>5</u>		<u>Existing looking east</u>
			<u>Proposed and Alternative 1 looking east</u>
<u>5.3-12</u>	<u>6</u>		<u>Existing looking east</u>
			<u>Proposed looking east</u>
<u>5.3-13</u>	<u>7</u>		<u>Existing looking south</u>
			<u>Proposed looking south</u>
<u>5.3-14 and 5.3-18</u>	<u>8</u>	<u>Existing looking north</u>	
		<u>Proposed and Alternative 1 looking north</u>	
<u>5.3-15 and 5.3-19</u>	<u>9</u>	<u>I-280</u>	<u>Existing looking west</u>
		<u>Proposed and Alternative 1 looking west</u>	

## ■ Impact Evaluation

### *Proposed Project*

Impact AE-1	<p><b>Effects on <u>Scenic Views</u></b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Proposed Project.</b></p> <p><b>NEPA: The Proposed Project would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. (Less than Significant <u>with Mitigation</u>)</b></p>
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For the purposes of this analysis, a view of scenic resources is defined as a public view that is broad and expansive (i.e., a scenic vista view) and of a significant landscape feature (e.g., a mountain range, lake, or coastline), ~~or~~ of a significant historic or architectural feature (e.g., views of a historic tower), or includes landscape features that enhance visual quality such as mature trees and vegetation, rock outcrops, and natural or well-maintained landscapes and development. A view of scenic resources is a location that offers high visual quality and a harmonious and visually interesting view. As described in Chapter 1, Project Purpose, Need, and Objectives, existing buildings at the Project site are two to three stories and up to 24 to 34 feet in height.

View of the Bay, East Bay Hills, and San Bruno Mountain are available from the Project site. Existing residents are considered to have moderately high viewer sensitivity to changes occurring at the Project site. Viewer response to the changes to the views resulting from the Proposed Project would be low, because scenic views out to the surrounding landscape from the Project site would be largely maintained. In addition, while some views may be lost, the visual quality of the Project site would be greatly improved from moderately low to moderate or moderately high, which would be a beneficial visual change at the Project site.

The Project site is visible from surrounding locations, such as from the edges of the Potrero Hill Recreation Center and along 23<sup>rd</sup> Street. However, the Project site is located on the side slopes of Potrero Hill and the heights of the existing buildings at the Project site allow for panoramic scenic vistas over the tops of the buildings and beyond to In the vicinity of the Project site, the views from portions of the Potrero Hill Recreation Center are considered scenic with high viewer sensitivity due to the nature of the use and the views of the Bay, East Bay Hills, and San Bruno Mountain from certain public areas of the park. The tops of existing buildings can be seen from the edges of the Potrero Hill Recreation Center and along 23<sup>rd</sup> Street, but views from these locations are focused on the panoramic vistas and not on the Project site itself. Changes to these scenic views, as a result of the Proposed Project, are discussed below using the representative viewpoints. Areas where viewer sensitivity would be considered low would be views from the sports field due to the context of the use, where users are involved in playing sports rather than contemplating the view.

Although the Project site is visible from other surrounding locations, the Project site is not part of a scenic view as viewed from outside the site because Potrero Hill blocks scenic views of any panoramic vistas beyond. In addition, the existing view of the site itself is of low quality due to the deteriorated character of the existing development. Viewer response to the changes from the Proposed Project from Viewpoints 3 through 9 would be low because no scenic views are seen from these locations. Thus, the only views of scenic resources that would be affected are the views from the Potrero Hill Recreation Center. The remainder of this impact analysis is, therefore, focused on Viewpoints 1 and 2. Private views are not considered scenic under the City's significance criteria, but are discussed here for informational purposes. The Proposed Project would obscure and/or alter some existing private views from neighborhoods to the west of the Project site along 23<sup>rd</sup> Street and Wisconsin Street, to the extent that such views are now available from residences. Currently, these residences have some background views of the Bay and distant hills and ridgelines facing east and south. Construction of the proposed buildings would block these views. The Proposed Project would replace longer range private views across the site with shorter range views of the proposed new buildings. The proposed change in private views could be experienced as an undesirable consequence for affected persons who have grown accustomed to existing visual conditions. The nature and experience of this change for each affected viewer would vary depending on the nature of the existing view across the Project site, the position and proximity of the proposed new buildings within the private view, and the subjective sensitivity of the viewer. The alteration or interruption of private views is a commonly expected and experienced consequence of new construction within a densely populated urban setting. A project would only be considered to have a significant effect on views of scenic resources if it were to substantially degrade or obstruct public scenic views observed from public areas. The changes to private views resulting from the Proposed Project would not be considered an adverse aesthetic effect under NEPA.

*22<sup>nd</sup> Street Trail (Viewpoint 1).* As shown in Figure 5.3-1 Photo A, the northern portion of the Recreation Center includes natural features and the 22<sup>nd</sup> Street Trail. Looking east, a channelized view of the Bay and East Bay Hills is provided through the dense vegetation. Viewer sensitivity would be high from this location but the view would be of only moderate quality given that it is somewhat restricted and narrow. Under the Proposed Project, as depicted in Figure 5.3-1 Photo A, a small portion of the proposed 50 and 40 foot high buildings would be visible from the trail. From this vantage point, the proposed buildings intrude somewhat into the middleground views, which include visible urban development such as warehouses and industrial uses. However, the Bay and the East Bay Hills would still be visible from this location and would not be substantially obscured by the proposed buildings. As shown in Figure 4.3-2, the existing view from the eastern terminus of the 22<sup>nd</sup> Street Trail affords nearly panoramic views of the San Francisco downtown area, the Bay Bridge, the Bay, and the East Bay Hills. Viewer sensitivity is considered high from this location and the view is also considered to be of high quality given the high vividness, intactness, and relative unity of this viewpoint. Under the Proposed Project, as depicted in Figure 5.3-1, Viewpoint 1A, the Project would slightly open up the vista by removing the existing buildings at Potrero Annex currently visible from this viewpoint. The



proposed new building would be located on the steep downslope and would not extend into the viewshed from this location. Thus, the Project as seen from View 1A would not introduce new height and bulk into the existing vista and would not substantially block the views to the northeast. Looking southeast from this vantage point, as shown in Figure 5.3-2, Viewpoint 1B, the proposed building at Block O would be visible. The building at Block O would add more height and slightly more mass, and bulk than the existing structures on site. While the proposed building at Block O would add height and some mass into the viewshed, it would not introduce elements into a currently unobstructed view. As shown in Figure 5.3-2, Viewpoint 1B, existing buildings at the Annex site are currently present in the views from this location and the terrain near the trail, existing buildings, and mature trees along the trail restrict the view. The existing mature trees and terrain along the trail would remain and continue to obscure views from the trail when looking in this direction. The proposed buildings would follow the side slope of the hill and step down, but would not substantially block views beyond what is present under existing conditions.

The addition of the building at Block O would not substantially obstruct this view and changes to this viewshed are considered less than significant. The majority of the panoramic views of the Bay and the East Bay Hills would still be visible from the trail and would not be substantially obscured by the proposed buildings.

As shown in Figure 5.3-3, Viewpoint 1C, the proposed building at Block O would be visible from the 22<sup>nd</sup> Street Trail looking south along the eastern edge of the Recreation Center. Block O would be taller and be slightly larger in mass and bulk than the existing buildings on-site. But the building at Block O would not introduce elements into a currently unobstructed view. Existing views looking south are mostly limited to the foreground by existing residential development located on the Project site and dense vegetation along the edges of the trail. Middleground and background views of the Bay and the East Bay Hills beyond, are not available looking in this direction. Foreground, middleground, and background views would be similar under the Proposed Project.

As shown in Figure 5.3-4, Viewpoint 1D, the existing development at Potrero Annex is not readily visible in views looking east from the bench below the tennis courts. While the proposed Building Block R would be visible, because it would taller than the existing buildings at that location, middleground and background views of the surrounding Bay and East Bay Hills would remain the focal point. These views are available through gaps in the hillside vegetation, and these views would be maintained under the Project, even with the taller buildings. In addition, the proposed buildings would not stand out in this view because of the vegetative screening and because development is a common visual element in this view.



SOURCE: Van Meter Williams Pollack LLP., 2015.

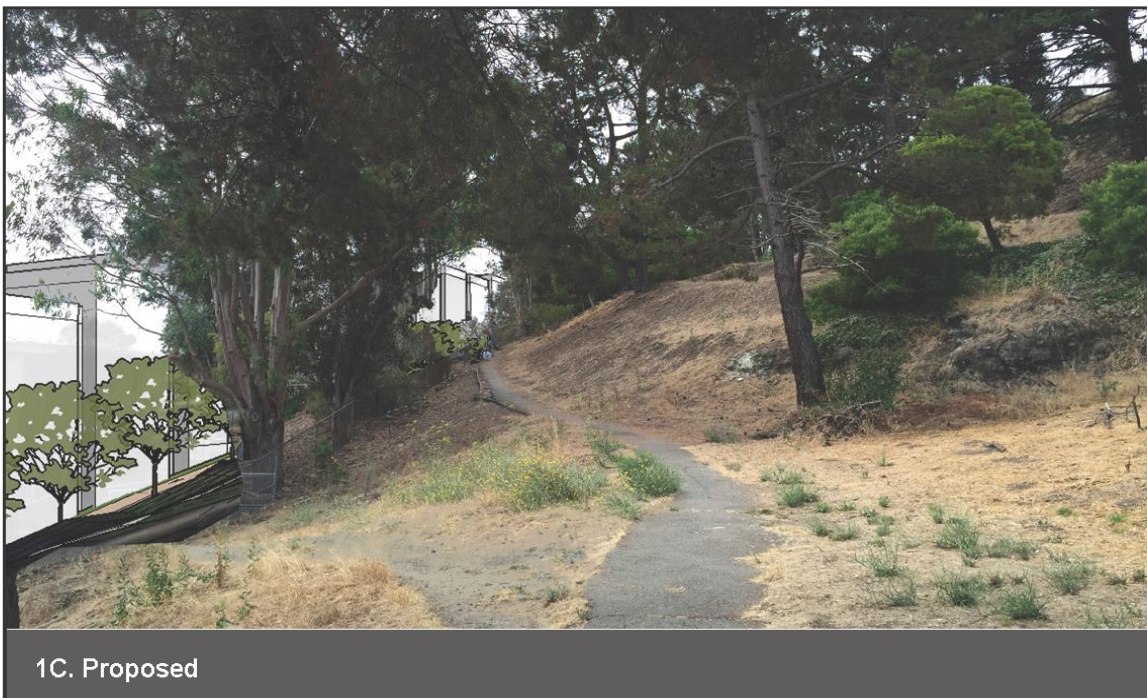
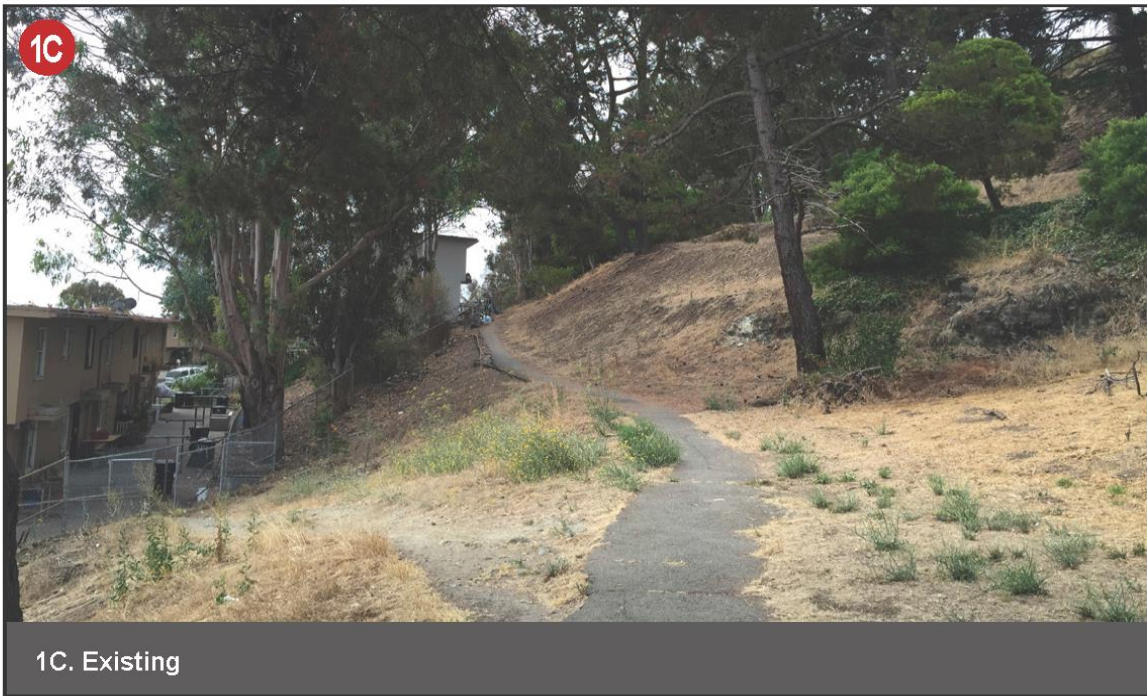
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 5.3-1: PROPOSED PROJECT, 22ND STREET TRAIL, LOOKING NORTH (VIEWPOINT 1A)**



SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-2: PROPOSED PROJECT, 22ND STREET TRAIL, LOOKING SOUTHEAST (VIEWPOINT 1B)





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-3: PROPOSED PROJECT, 22ND STREET TRAIL, LOOKING SOUTH (VIEWPOINT 1C)



SOURCE: Van Meter Williams Pollack LLP., 2015.

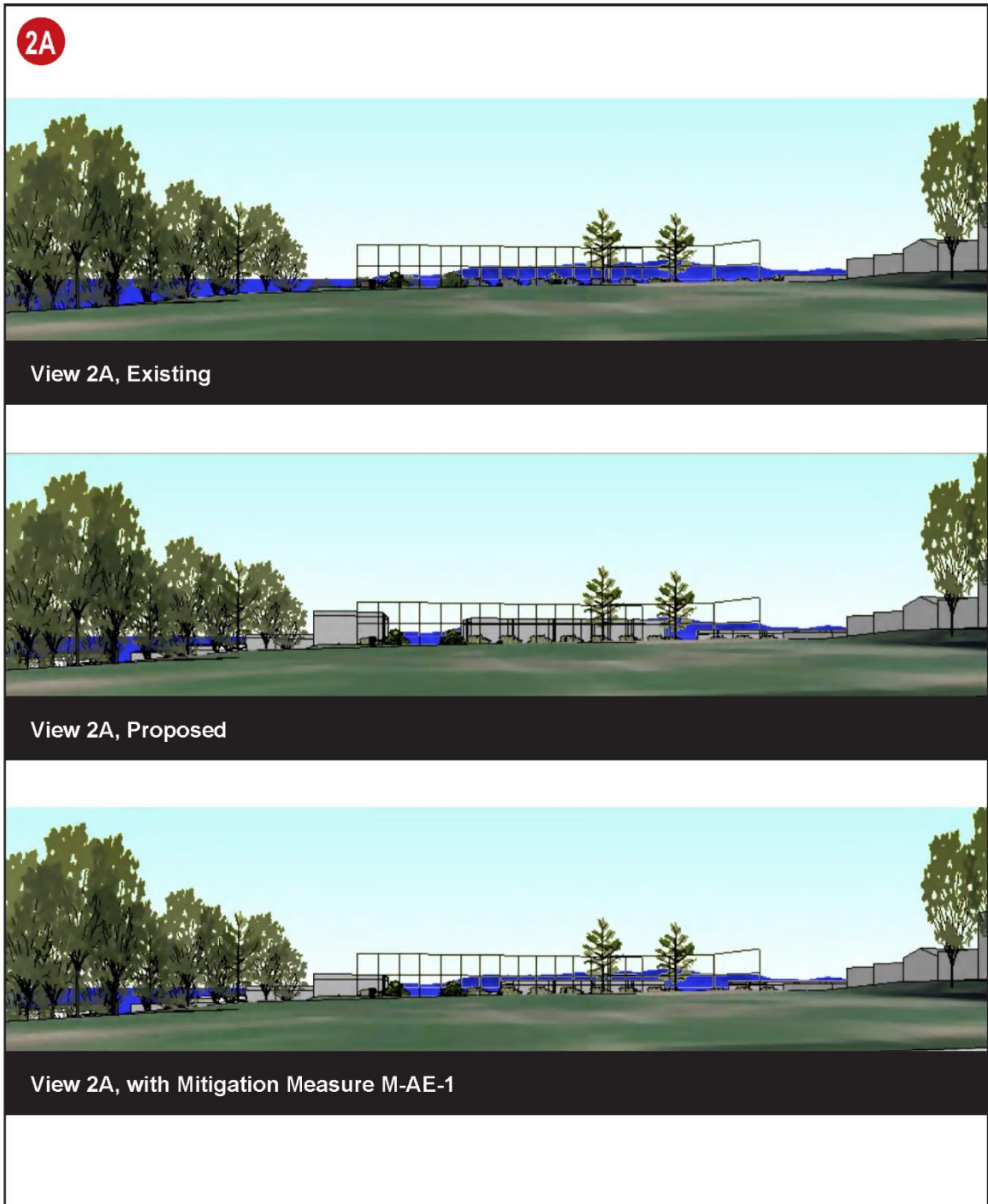
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-4: PROPOSED PROJECT, BENCH BELOW TENNIS COURTS, LOOKING EAST  
(VIEWPOINT 1D)

*Potrero Hill Recreation Center (Viewpoint 2).* ~~Figure 5.3-2~~ Figure 5.3-5 through 5.3-7 Photo A shows the existing view from the southern portion of the Recreation Center at the baseball field. Distant views of the higher elevations to the south, including McLaren Ridge and San Bruno Mountain, are seen from this location, are partially obscured by the chain-linked fence, dense vegetation along the perimeter of the Recreation Center, and utility pole and wires. by foreground vegetation. Viewer sensitivity would be high from this location and the view would be of moderately high visual quality, as described in Section 4.3.2, Environmental Setting.

~~It is important to note that the views of the Proposed Project would change as the viewer adjusts position. As the viewer walks towards the site along the 22<sup>nd</sup> Street Trail, the development would appear increasingly larger and would likely block views of a portion of the Bay and East Bay Hills. Nonetheless, as the viewer approaches the buildings, the dense vegetation opens up and allows for some middleground and background views. As such, although the proposed buildings' height and massing would increase over existing conditions, this would not represent a substantial change to the overall views from this location. The intensity of the change would not be significant as the viewer descends the trail.~~

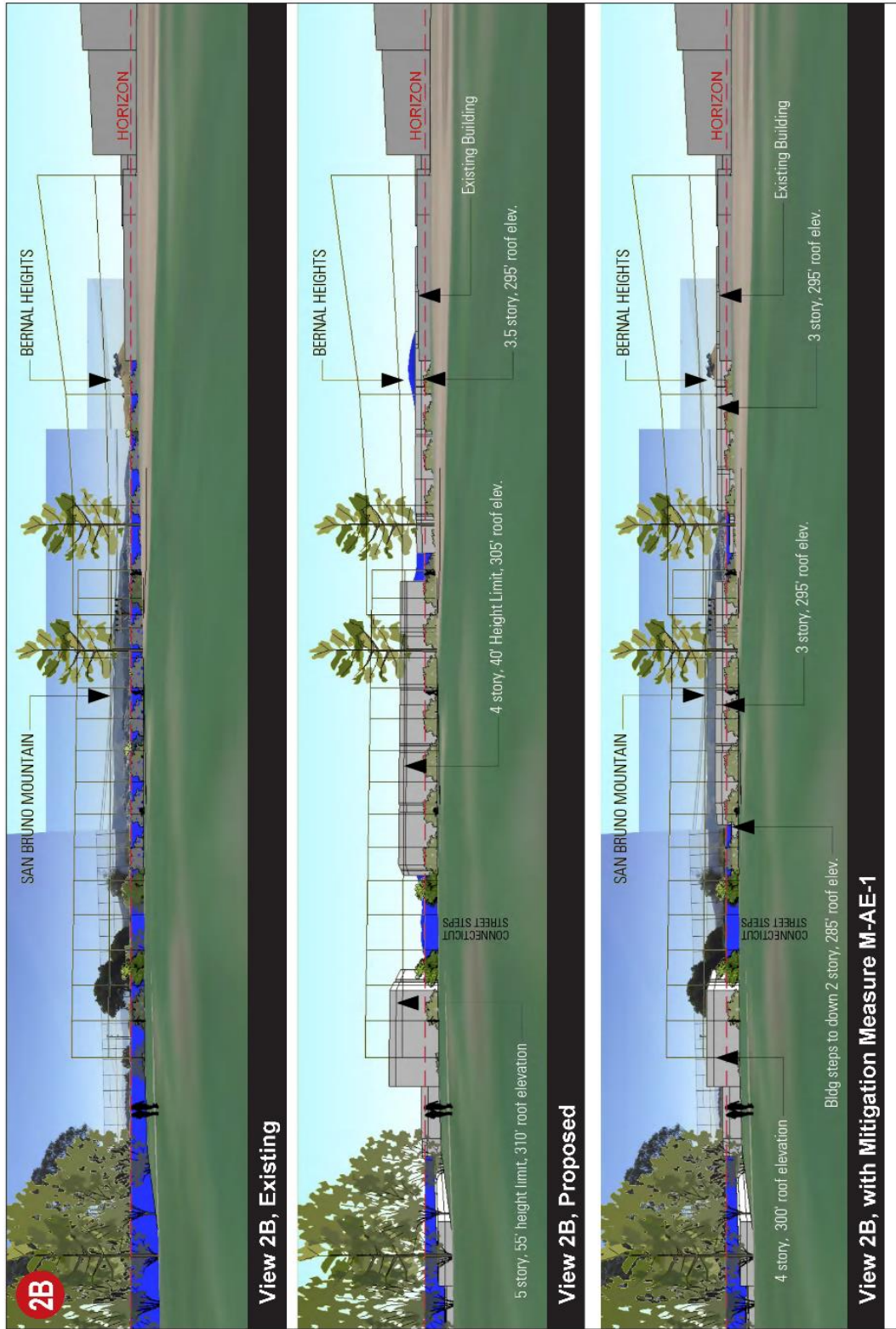
~~Background views are also somewhat diminished by the chain linked fence and vegetation in the foreground and would be considered of low to moderate quality. Viewer sensitivity would be relatively low in this location, as the primary use of the area is field sports rather than scenic viewing. As shown in Figure 5.3-2, Photo B~~ Figure 5.3-5 through 5.3-7, the proposed buildings, which would be approximately 40 to 50 feet in height, would obscure a portion of the view of the ridgeline ~~and would change the existing view from the southern area of the Recreation Center to one that features a built environment. Project landscaping would screen and soften a portion of the new buildings, but the visual character of the site would represent a change as seen from this vantage point.~~ Although limited channelized views of the McLaren Ridge and San Bruno Mountain would be provided between the proposed buildings, the height and mass of the proposed buildings would significantly change the existing view from the southern area of the Recreation Center from one that features predominantly natural landscapes to one that features a built environment. The existing relatively intact views of the McLaren Ridge and San Bruno Mountain would be significantly obscured by the height of the proposed buildings and the visual quality would be reduced to moderate. As shown in Figure 5.3-8, views looking east from the Potrero Hill Recreation Center playfields would not be affected by the Project due to the steep slopes adjacent to the park. Furthermore, these views are dominated by existing dense vegetation that obscures views to the east. The vegetation would remain following Project implementation.





SOURCE: Van Meter Williams Pollack LLP., 2015.

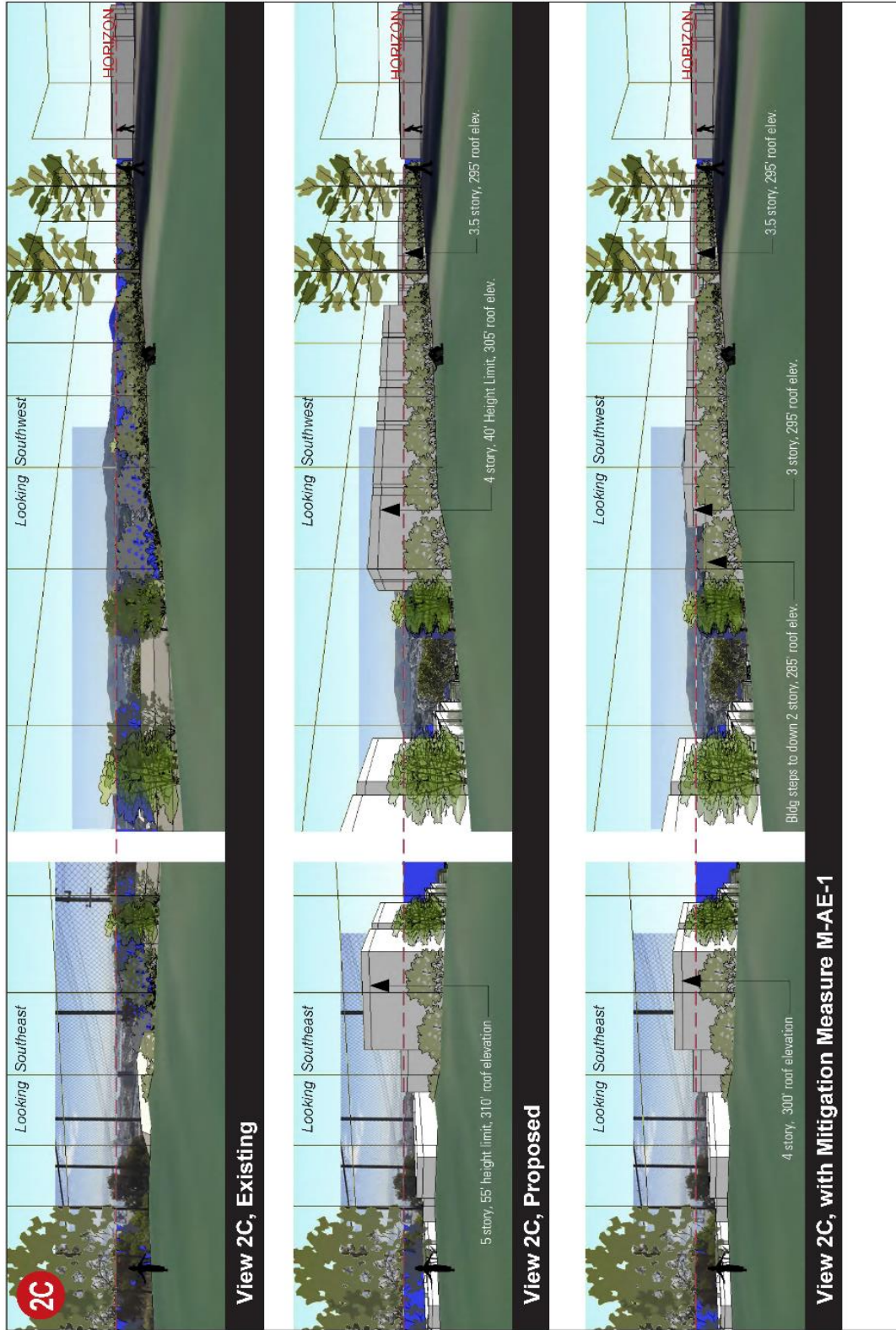
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-5: PROPOSED PROJECT, POTRERO HILL RECREATION CENTER, LOOKING SOUTH  
(VIEWPOINT 2A)



SOURCE: Van Meter Williams Pollack LLP., 2015.

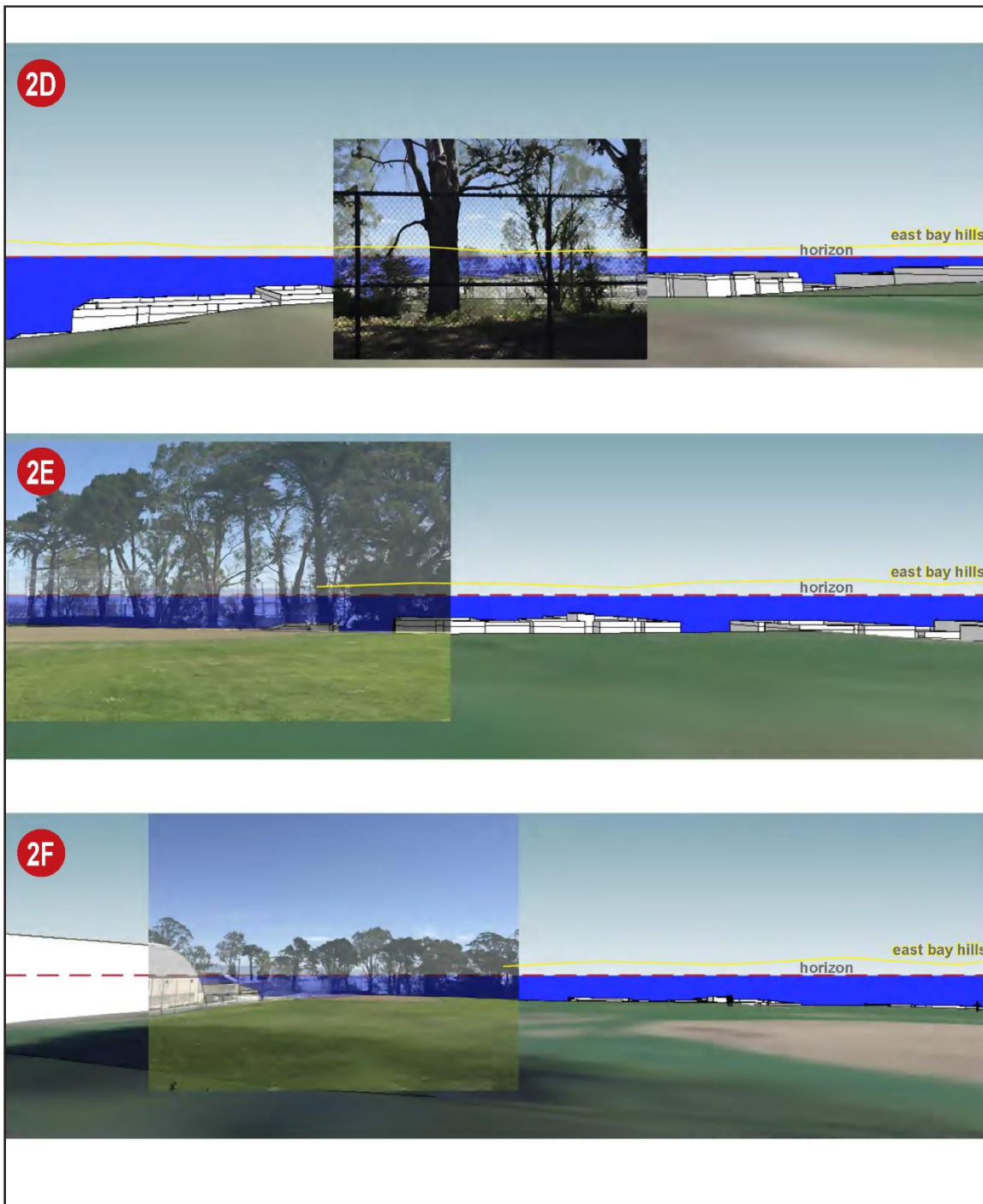
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 5.3-6: PROPOSED PROJECT, POTRERO HILL RECREATION CENTER, LOOKING SOUTH**  
 (VIEWPOINT 2B)





SOURCE: Van Meter Williams Pollock LLP, 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 5.3-7: PROPOSED PROJECT, POTRERO HILL RECREATION CENTER, LOOKING SOUTH (VIEWPOINT 2C)**



SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-8: PROPOSED PROJECT, POTRERO HILL RECREATION CENTER,  
LOOKING EAST FROM PLAYFIELDS (VIEWPOINTS 2D, 2E, 2F)

In summary, the Proposed Project would add buildings that are up to 15 feet taller than the existing buildings adjacent to the Recreation Center, and these new buildings would impact views of scenic resources. The buildings would block some middleground urban development views and portions of the ridgeline and the Bay. From Viewpoint 1, viewer sensitivity is moderate to high, but because the views would remain somewhat visible and the view corridor is narrow, the intensity of the impact would not be significant. From Viewpoint 2, while viewer sensitivity and awareness are lower than from Viewpoint 2 given the type of use (field sports), the intensity of the effect would be considered moderate because the change would be more substantial, as discussed. The Bay, East Bay Hills, and ridgelines would still be visible from the Recreation Center, between the new buildings. In summary, from Viewpoint 1, viewer sensitivity is considered high and the proposed buildings would add some bulk into an already obstructed view to the southeast. Because the overall existing panoramic views of the San Francisco Downtown area, the Bay Bridge, the Bay, and the East Bay Hills would remain visible, the impact at Viewpoint 1 would not be significant. At Viewpoint 2, the Proposed Project would add buildings that are up to 15 feet taller than the existing buildings adjacent to the Recreation Center, and these new buildings would alter views of scenic vistas. Although channelized views of the ridgeline would be provided between the proposed buildings, these views would be limited and would still significantly block views and reduce public opportunities to view McLaren Ridge and the San Bruno Mountain.

Local Streets Surrounding the Project Site (Viewpoints 3 through 8). The Proposed Project would obscure and/or alter some existing private views from neighborhoods to the west of the Project site along 23<sup>rd</sup> Street and Wisconsin Street. Currently, background views of the Bay and distant hills and ridgelines facing east (refer Figures 5.3-9, 5.3-11, and 5.3-12) and south (refer Figures 5.3-10 and 5.3-13) are available and enjoyed by local residents. As shown in the simulations of the Proposed Project, the proposed buildings would be located across the street from existing residences, similar in height to the existing buildings, and would replace longer-range public views from local roadways that are available across the site with shorter-range views of the proposed new buildings. The proposed change in public views from local streets could be experienced as an undesirable consequence for affected persons who have grown accustomed to existing visual conditions. The nature and experience of this change for each affected viewer would vary depending on the nature of the existing view across the Project site, the position and proximity of the proposed new buildings, and the subjective sensitivity of the viewer. The existing scenic vista views of the McLaren Ridge and San Bruno Mountain would be significantly obscured by the height of the proposed buildings along portions of 23<sup>rd</sup> Street and Wisconsin Street where such views currently exist. However, the alteration or interruption of views from public roadways is a commonly expected and experienced consequence of new construction within a densely populated urban setting. Although the Proposed Project would obstruct scenic views, it would redevelop and transform a visually deteriorating area within the Project vicinity and improve visual conditions at the site. In addition, while not depicted in the simulations, street trees would be planted that would soften and reduce the apparent scale of proposed buildings so that the new development appears to be a visual extension of existing

development. Lastly, view corridors down local streets would be maintained and improved, in some cases, by reducing the amount of visible utilities and framing views, as shown in Figures 5.3-9 through 5.3-12. In some cases, the Proposed Project would obscure views of industrial areas near I-280 (refer to Figure 5.3-12), which may be deemed desirable to some viewers. The Proposed Project would also introduce new view corridors by adopting a grid pattern consistent with surrounding areas.

*Private Views Surrounding the Project Site.* Private views are not considered scenic under the City's significance criteria, but are discussed here for informational purposes. As described above under *Local Streets Surrounding the Project Site*, the Proposed Project would obscure and/or alter some existing private views from neighborhoods to the west of the Project site located along 23<sup>rd</sup> Street and Wisconsin Street, to the extent that such views are now available from residences. Currently, these residences have some background views of the Bay and distant hills and ridgelines facing east and south. The Proposed Project would block some of these views. The Proposed Project would replace longer-range private views across the site with shorter-range views of the proposed new buildings. The proposed change in private views could be experienced as an undesirable consequence for affected persons who have grown accustomed to existing visual conditions. The nature and of this change for each affected viewer would vary depending on the nature of the existing view across the Project site, the position and proximity of the proposed new buildings within the private view, and the subjective sensitivity of the viewer. The alteration or interruption of private views is a commonly expected and experienced consequence of new construction within a densely populated urban setting. A project would only be considered to have a significant effect on views of scenic resources if it were to substantially degrade or obstruct public scenic views observed from public areas. The changes to private views resulting from the Proposed Project would not be considered an adverse aesthetic effect under NEPA.

In general, the Proposed Project would result in a *significant impact* to the views of scenic resources and would generally reduce public opportunities to view scenic resources. Implementation of Mitigation Measure M-AE-1 would reduce this significant impact to a *less-than-significant* level as it would reduce heights on Blocks J, K, and L by 10 feet. Buildings along 23<sup>rd</sup> Street would be reduced as follows: Block J from 40 feet to 30 feet, Block K from 40 feet to 30 feet, and Block L from 50 feet to 40 feet. Scenic vista views from 23<sup>rd</sup> Street and Wisconsin Street would be obscured by the height of the proposed buildings. However, as described above, infill development and the alteration of views from public roadways is a commonly expected and experienced consequence of new construction within a densely populated urban setting. In addition, the Project would redevelop and transform a visually deteriorating area and introduce street trees that would soften and reduce the apparent scale of proposed buildings so that the new development appears to be a visual extension of existing development. In addition, view corridors down local streets would be maintained and improved, in some cases, by reducing the amount of visible utilities and framing views. The Proposed Project would also introduce new scenic vista view corridors through the adopting a grid pattern consistent with surrounding local roadway patterns. Therefore, changes to scenic vista views from local

roadways is not considered significant. Implementation of Mitigation Measure M-AE-1 would allow views of the ridgeline to remain largely visible from the most sensitive public viewpoints near the Potrero Hill Recreation Center. Figures 5.3-5 through 5.3-7 depicts visual simulations of the modified reduced height scenario as prescribed by Mitigation Measure M-AE-1. Although the built elements of the Proposed Project would be introduced into the foreground and would block some middleground urban development views, long-range views of the McLaren Ridge and the San Bruno Mountain scenic resources would still be visible from this viewpoint with the reduced building heights. Thus, with implementation of Mitigation Measure M-AE-1, the Proposed Project would not substantially block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. Implementation of Mitigation Measure M-AE-1 would result in a redistribution of units on the Project site and no previously unidentified impacts would occur as a result of this mitigation measure.

**Mitigation Measure M-AE-1 – Reduce Heights of Buildings Along 24<sup>th</sup> Street.** The project developer shall reduce heights of buildings along 24<sup>th</sup> Street in order to preserve views of the McLaren Ridge and San Bruno Mountain from the Potrero Hill Recreation Center. Specifically, the height of Block J along 24<sup>th</sup> Street shall not exceed 30 feet; the height of Block K along 24<sup>th</sup> Street shall not exceed 40 feet; and the northwest portion of Block L shall not exceed 40 feet.

<p><b>Impact AE-2</b></p>	<p><b>Effects on Visual Character during Construction</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Proposed Project.</b></p> <p><b>NEPA: The Proposed Project would potentially introduce elements that are out of character or scale with the existing physical environment or detract from the aesthetic appeal of the surrounding area during construction. (Less than Significant)</b></p>
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For the purposes of this analysis, a substantial degradation of the existing visual character or quality of the Project site would occur if the Proposed Project would introduce a new visible element that is inconsistent with the overall quality, scale, and character of the site or surrounding development. The analysis considers the degree of contrast between the proposed features and existing features, the sensitivity of viewers of the site, the quality of the existing view, and how the Proposed Project would contribute to the area’s aesthetic value. This analysis examines the changes in visual character and quality of the site itself during construction and operation, and also examines how the Proposed Project would change the existing visual character and quality as seen from surrounding vantage points, as identified in Section 4.3.

During the construction phases of the Proposed Project, construction vehicle and equipment staging areas, exposed building pads, storage trailers, open trenches, debris piles, and roadway bedding and equipment would be visible on or near the Project site. Construction equipment such as backhoes and dump trucks would be visible from certain perimeter roadways around the Project site, particularly Wisconsin Street, 23<sup>rd</sup> Street, 25<sup>th</sup> Street, Pennsylvania Avenue, and Connecticut Street.

The Proposed Project would degrade the existing visual character of the Project site during construction phases. Construction is anticipated to occur over an approximately ten-year period. During the construction stage, there would be temporary visual impacts from the demolition of existing buildings, the assembly of new structures, and equipment staging. Construction materials on the Project site during construction phases of the Proposed Project would introduce elements that are out of character with the existing environment, such as materials stockpiles. Construction equipment generally would not be located or extend to a height that would obstruct any scenic views. The exception would be if cranes are utilized, but given the nature of this piece of equipment (tall and very narrow in appearance), it would not substantially obstruct any scenic views. However, the aesthetic effect during construction would be temporary, and thus would be *less than significant*.

Although construction-related aesthetic impacts would be temporary, given the ten-year duration of the construction period, an improvement measure has been included to further reduce less-than-significant aesthetic impacts under CEQA. Implementation of Improvement Measure I-AE-2a would ensure that all construction staging areas would not be visible from street level; ensure cleanliness of the construction site, surrounding streets, and construction equipment that would be stored or driven beyond the construction area; and that the City would review and approve a plan for construction staging, access, and parking prior to issuance of a building permit. With implementation of Improvement Measure IM-AE-2a, construction-related impacts would continue to be *less than significant*.

**Improvement Measure IM-AE-2a – Construction Period Screening and Cleaning.** Prior to the issuance of any site activity or building permits, construction documents shall be prepared to require all contractors to strictly control the staging and cleanliness of construction equipment stored or driven beyond the limits of the work area. Construction equipment shall be parked and staged on the Project site, and staging areas shall be screened from view at the street level. Before building permits are issued, the project applicant (through the construction contractors) shall submit a construction staging, access, and parking plan to the San Francisco Department of Building Inspection for review and approval. Construction workers shall be prohibited from parking their vehicles on the street outside of the Project site. Vehicles shall be kept clean and free of mud and dust before leaving the Project site. Each week, the project contractors shall be required to sweep surrounding streets used for construction access to maintain them free of dirt and debris.



**Impact AE-3****Effects on Visual Character during Operation**

**CEQA: This topic is not applicable under CEQA for the Proposed Project.**

**NEPA: The Proposed Project would not introduce elements that are out of character or scale with the existing physical environment or that detract from the aesthetic appeal of the surrounding area during operation. (Less than Significant)**

**Impacts on On-Site Character.** The Proposed Project would replace the existing aging structures with new, visually improved buildings. With implementation of the Proposed Project, the Terrace site and the Annex site would be developed with up to 1,700 residential units that would consist of townhomes, townhomes over flats, and stacked flats. The buildings would be between three and six stories and would range in height from 32 to 65 feet. The building heights would vary within the Project site, with the taller buildings generally down-gradient and not adjacent to existing residential development. Commercial uses and community facilities would also be developed.

In addition, open space elements would be incorporated into the Project site. Currently, limited open space is provided between the existing buildings in the form of patchy lawns and walkways. Under the Proposed Project, public open space would include a large park on 24<sup>th</sup> Street, a pocket park at 25<sup>th</sup> Street and Connecticut, an overlook area on 25<sup>th</sup> Street and 26<sup>th</sup> Street, a community garden on Texas Street, a pocket park at the confluence of Missouri Street and Texas Street, and a Texas Street overlook park. Public and private open spaces across the Project site would total approximately 7 acres. Landscaping would also be included in the public and private open spaces, between buildings, along the streets, and in parking areas. All 254 existing trees on the Project site would be removed. There are no landmark trees or street trees at the site.<sup>10</sup> Any removal of these trees associated with the Proposed Project would require a permit as provided in Article 16, Section 806. Compliance with the *Public Works Code* would require replacement of all removed trees.

The existing curvilinear streets would also be realigned under the Proposed Project to provide a grid pattern, consistent with surrounding streets and the general pattern of streets in the neighborhood. Texas Street and Missouri Street would be extended and would connect at the northern border of the Project site. Arkansas Street would be extended from 23<sup>rd</sup> Street south to 26<sup>th</sup> Street. Instead of traveling northwest/southeast, Connecticut Street would be realigned to travel north/south and would terminate at 24 and ½ Street. Two new streets are proposed for an east/west alignment: a 24<sup>th</sup> Street extension and 24 and ½ Street. Dakota Street, Turner Terrace, and Watchman Way would be eliminated. The grid pattern street system would visually enhance the Project site and allow it to blend and connect with its surroundings.

The Proposed Project would enhance street-level activity and community interaction by providing pedestrian connections. Sidewalks would be included along all blocks of the Project site for pedestrian

<sup>10</sup> GLS Landscape/Architecture, Tree Disclosure Statement (June 23, 2010).

safety, walking comfort, and convenience. In addition, pedestrian bulb-outs and sidewalks would be provided at intersections to improve the pedestrian experience. Other pedestrian connections would link residents to proposed onsite neighborhood amenities such as the proposed Community Center, open spaces, and parks, and offsite uses such as the Potrero Hill Recreation Center and Starr King Elementary. Since the proposed open spaces and parks would be accessible to the public, the Proposed Project would promote interaction with the existing surrounding neighborhoods and the future residents of the Project site. Realignment of the existing streets to a grid pattern would also link the Project site with the rest of the neighborhood. Since the Project site is not currently visually connected and does not contain useful pedestrian links with the rest of the neighborhood, the increase of street-level activity and community interaction would be beneficial.

While the Proposed Project would increase on-site building heights and density of development, the Proposed Project would improve the current visual setting. Currently, the Project site consists of older, unkempt buildings and vegetation that are inconsistent with the existing residential development and open spaces to the north and west. The Proposed Project would replace the existing decrepit buildings with enhanced landscaping, bicycle/pedestrian amenities, and modern structures that would complement the existing surroundings. The proposed development design would relate to the context of its surroundings by creating contiguous landscape areas and buildings that reflect modern, current architectural design. The potential signage and street furniture to be installed as part of the Proposed Project is currently unknown. However, the final Design Standards and Guidelines prepared for the Proposed Project and ultimately approved by the City would ensure that these features would be in character with existing architectural styles and would not differ in materials, color, or style in an inappropriate manner. Therefore, the impacts on the character of the Project site would be *less than significant*.

**Impacts on Public View Corridors.** Existing view corridors include views of the Project site from nearby streets, adjacent residential neighborhoods, and Starr King Elementary School. The streets bordering the Project site that could be impacted by the Proposed Project include 23<sup>rd</sup> Street, 24<sup>th</sup> Street, 25<sup>th</sup> Street, Wisconsin Street, and Connecticut Street. According to the Urban Design Element of the General Plan, views from streets and other public areas should be preserved, created, and improved where they include water, open spaces, large buildings, and other major features of the City pattern.<sup>11</sup>

In order to determine the impacts on public view corridors, especially where such corridors afford views of the Bay, several massing simulations were prepared from nine vantage points. The vantage point locations were selected as representative of the various views that could be held in the Project area. It should be noted that views from Viewpoints 1 and 2 are analyzed in Impact AE-1 as impacts on scenic views. This analysis focuses on views from public streets in the Project area that have been identified as having views of scenic resources and that could be affected by implementation of the

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<sup>11</sup> City and County of San Francisco, *San Francisco General Plan, Urban Design Element* (adopted December 7, 2010), <[http://www.sf-planning.org/ftp/General\\_Plan/I5\\_Urban\\_Design.htm](http://www.sf-planning.org/ftp/General_Plan/I5_Urban_Design.htm)> (accessed May 7, 2012).



Proposed Project. The moderate-scale development and open space between the existing buildings on the Project site are inconsistent with its surroundings, which include industrial uses to the east and south and gridded streets with dense housing to the north and west. This contrast contributes to an incoherent visual pattern with limited unity between the Project site and its surroundings.

The addition of proposed trees, formal landscaping, and streetscape/sidewalks would improve the aesthetics of the overall area and create a more pedestrian-friendly environment that would visually link the surrounding neighborhood. The taller buildings would be visible to the surrounding uses; however, the existing development is inconsistent with its surroundings and does not offer visual unity between the residential units to the north and west, industrial/warehouse uses to the east and south, and the Project site. Although the long-term visual characteristics of the Project site would be altered with implementation of the Proposed Project, the Proposed Project would provide more design continuity with the adjacent neighborhood by creating buildings that reflect modern architectural design, contiguous landscaping, and grid-pattern streets. Therefore, the relationship of the Proposed Project's design to the context of its surroundings would be improved over existing conditions.

To further reduce the impacts of views of the proposed development from adjacent areas, the project applicant would install landscaping that would serve to soften some of the views of the proposed buildings. Consistent with the Urban Design Element and the *Planning Code*, landscaping should enhance view corridors and should be planted along streets. At maturity, the vegetation planted at the Project site could mask a portion of the buildings and make the structures more subordinate and harmonious with their surroundings.

*Intersection of 23<sup>rd</sup> Street and Wisconsin Street (Viewpoint 3)*. As shown in ~~Figure 5.3-3~~ Figure 5.3-9 Photo A (Viewpoint 3), the existing foreground view facing east on 23<sup>rd</sup> Street consists of multi-family residential units to the north of 23<sup>rd</sup> Street, street pavement, overhead utility wires and poles, and a chain-link fence surrounding the Project site. The middleground views encompass mature trees at the Recreation Center, minimal vegetation at the Project site, and the roofs of the existing buildings at the Project site. Background views of the Bay (Viewpoint 3) and ridgelines (Viewpoint 4) are limited due to intervening vegetation and structures. The views from Viewpoint 4 of the distant ridgelines open up and become more expansive as a motorist or pedestrian travels south, but because the views would be of short duration, viewer ~~sensitivity~~ response to changes in views from Viewpoint 3 would be low to moderate from ~~Viewpoint 3~~. Currently, there is little visual unity between the Project site and its surroundings, as noted.

However, the Proposed Project, as shown in ~~Figure 5.3-3~~ Figure 5.3-9 Photo B, would construct multi-family residential buildings that would be visually compatible with the existing residences on the other side of 23<sup>rd</sup> Street. Although these buildings would be approximately 40 feet, which is taller than the existing structures, they would be stepped downhill to follow the slope of the terrain, making them appear to be approximately of equal height. In addition, the existing utility wires and poles on-

site would be removed and undergrounded with implementation of the Proposed Project, which would further improve visual conditions. The density associated with the Proposed Project would be consistent with the multi-family residential units to the north of 23<sup>rd</sup> Street.

*Intersection of Wisconsin Street and 23<sup>rd</sup> Street (Viewpoint 4).* ~~Figure 5.3-4~~ Figure 5.3-10 Photo A depicts the existing view facing south on Wisconsin Street. Foreground views include multi-family residential units to the west of Wisconsin Street, street pavement, and overhead utility wires and poles. The middleground view mainly consists of mature vegetation and some industrial/warehouse buildings, while there are channelized background views of distant ridgelines and hills. The views from Viewpoint 4 of the distant ridgelines open up and become more expansive as a motorist or pedestrian travels south, but because the views would be of short duration, viewer ~~sensitivity~~ response to changes in views would be low to moderate from Viewpoint 4.

The Proposed Project, as shown in ~~Figure 5.3-4~~ Figure 5.3-10 Photo B, would add new multi-family residential buildings to the east of Wisconsin Street and would underground the overhead wires and utility poles. Although the Proposed Project would add new height and mass to this area, the uses and the heights of the buildings would be visually compatible and consistent with the context of the existing setting. In addition, the density associated with the Proposed Project would be consistent with the multi-family residential units to the west of Wisconsin Street. The Proposed Project would provide unity between the existing residential uses to the east of Wisconsin Street and the Project site.

*Intersection of 24<sup>th</sup> Street and Wisconsin Street (Viewpoint 5).* As depicted in ~~Figure 5.3-5~~ Figure 5.3-11 Photo A, the existing view from the intersection of 24<sup>th</sup> Street and Wisconsin Street (adjacent to Starr King Elementary School) consists of the buildings and mature vegetation at the Project site and limited channelized views of the Bay. The Proposed Project (~~Figure 5.3-5~~ Figure 5.3-11 Photo B) would construct two 50-foot-tall buildings to the north of 24<sup>th</sup> Street, which would step up to 65 feet set back from the street. This would result in visual changes and an increase in density from existing conditions by adding greater mass and bulk at this corner.

However, the existing middleground view from this location includes mature vegetation and the current buildings at the Project site, which do not comprise a significant view. In addition, since the Proposed Project would grade the existing site and realign the existing curvilinear streets into grid streets, new view corridors of the Bay would be provided from this location. Although the buildings to the north of 24<sup>th</sup> Street would increase mass and bulk in this location, the buildings to the south of 24<sup>th</sup> Street would be stepped downhill, making them appear smaller. The proposed buildings would continue to allow for intermittent views of the Bay all along the street.



A. EXISTING



B. PROPOSED

SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-9: PROPOSED PROJECT, 23RD STREET AT WISCONSIN STREET, LOOKING EAST (VIEWPOINT 3)



**A. EXISTING**

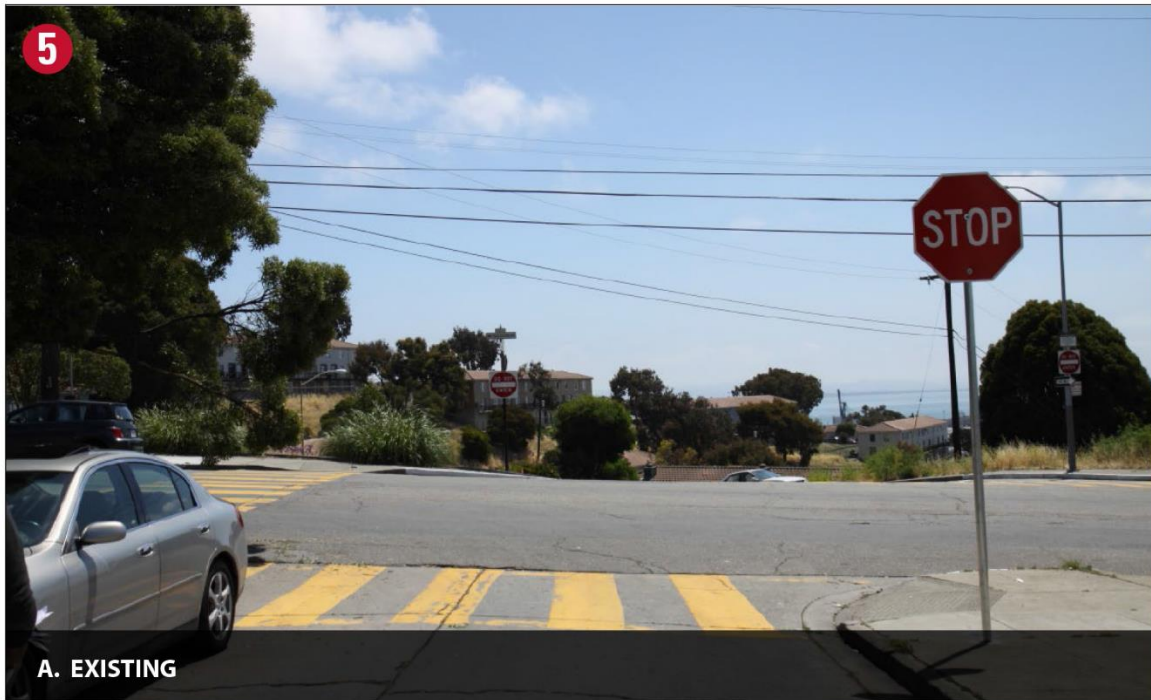


**B. PROPOSED**

SOURCE: Van Meter Williams Pollack LLP., 2015.

**POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)**  
**FIGURE 5.3-10: PROPOSED PROJECT, WISCONSIN STREET AT 23RD STREET, LOOKING SOUTH (VIEWPOINT 4)**





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-11: PROPOSED PROJECT, 24TH STREET AT WISCONSIN STREET, LOOKING EAST (VIEWPOINT 5)



SOURCE: Van Meter Williams Pollack LLP., 2015.

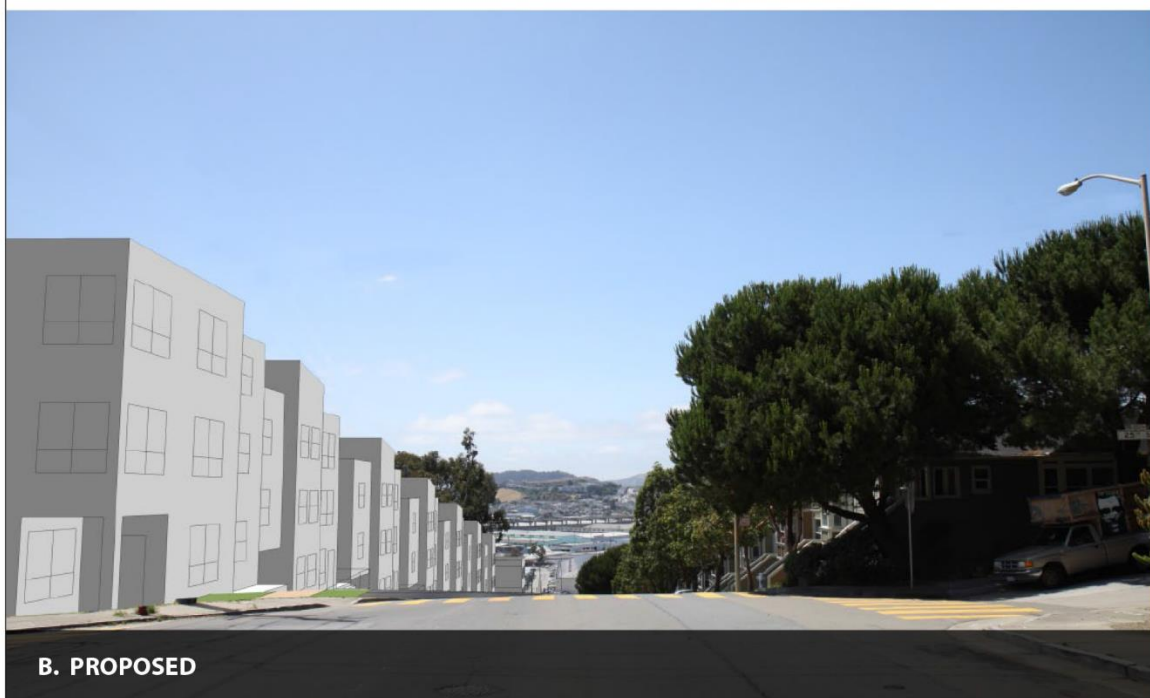
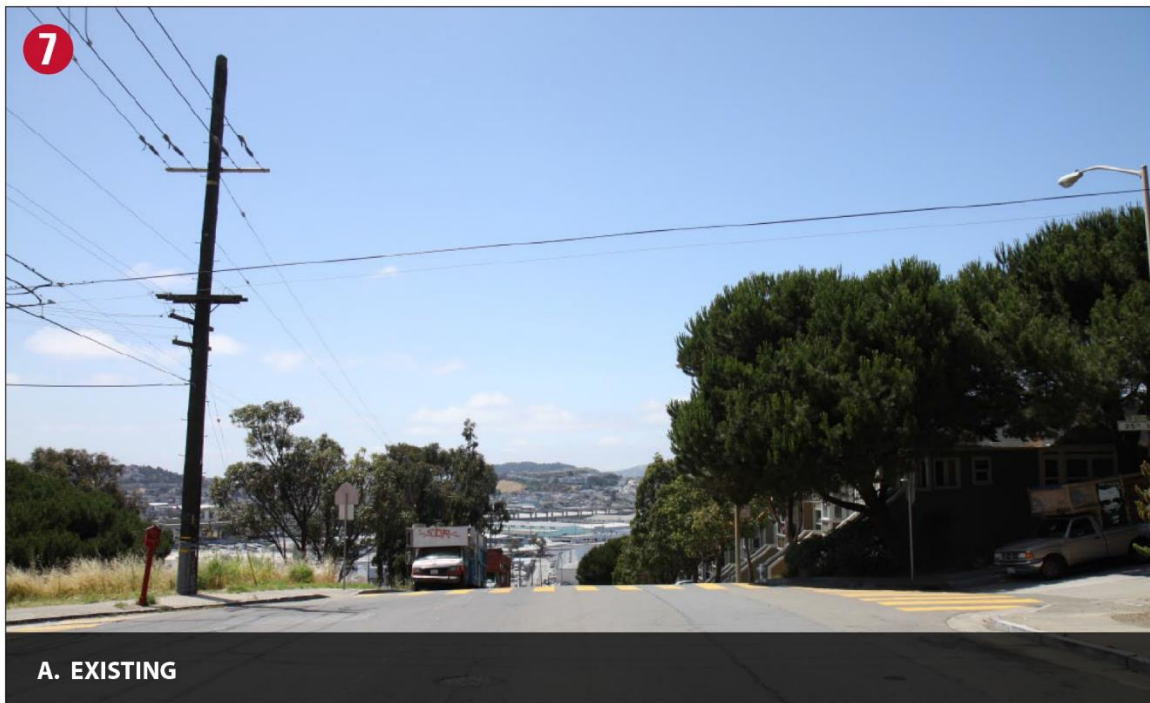
POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-12: PROPOSED PROJECT, 25TH STREET AT WISCONSIN STREET, LOOKING EAST (VIEWPOINT 6)

*Intersection of 25<sup>th</sup> Street and Wisconsin Street (Viewpoint 6).* ~~Figure 5.3-6~~ Figure 5.3-12 Photo A shows the existing view from the intersection of 25<sup>th</sup> Street and Wisconsin Street facing east. Foreground views include existing single-family and multi-family residences, street pavement, and overhead utility lines and poles. Middleground views include mature vegetation and the cranes of the shipyard with background views of the Bay. The Proposed Project (~~Figure 5.3-6~~ Figure 5.3-12 Photo B) would add new buildings along 25<sup>th</sup> Street with heights up to 40 feet. The height and mass of these new buildings would appear consistent with the surrounding development, due to the site topography and the stepped placement of structures downhill. As shown, the utility wires and poles would be removed, reducing visual clutter. While the Proposed Project would reduce the amount of the Bay that is visible from this vantage point, some channelized views of the Bay facing east would be retained.

*Intersection of Wisconsin Street and 25<sup>th</sup> Street (Viewpoint 7).* ~~Figure 5.3-7~~ Figure 5.3-13 Photo A depicts the existing view from the intersection of 25<sup>th</sup> Street and Wisconsin Street facing south. As shown, the view mainly consists of dense vegetation to the west of Wisconsin Street (with intermittent views of the existing single-family residential units in the Parkview Heights development) and sparse landscaping at the Project site. Channelized views of distant hills are seen. With implementation of the Proposed Project (~~Figure 5.3-7~~ Figure 5.3-13 Photo B), new housing would be added to the west of Wisconsin Street at a height of up to 40 feet. These multi-family buildings would be similar in height and massing as the existing single-family residential development in the area. A substantial portion of the existing channelized background view would be retained and no other major views would be obscured from this location. Although the Proposed Project, as viewed from this location, would represent a significant increase in density in the area, these changes, while noticeable, would not be expected to diminish the visual quality or character of the Project site.

*Intersection of Cesar Chavez Street and Connecticut Street (Viewpoint 8).* As shown in ~~Figure 5.3-8~~ Figure 5.3-14 Photo A, foreground views from the intersection of Cesar Chavez Street and Connecticut Street include light industrial and warehouse buildings and some of the existing structures at the Project site. Middleground views include the vegetation and buildings at the Project site and the mature trees at the Recreation Center. No long-distance views are provided due to the steep topography.





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 5.3-13: PROPOSED PROJECT, WISCONSIN STREET AT 25TH STREET, LOOKING SOUTH (VIEWPOINT 7)**





SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-14: PROPOSED PROJECT, CONNECTICUT STREET AT CESAR CHAVEZ STREET, LOOKING NORTH (VIEWPOINT 8)

~~Figure 5.3-8~~~~Figure 5.3-14~~ Photo B represents the view from this location with implementation of the Proposed Project. As shown, the Proposed Project would add substantial height, bulk, and massing to the Project site. Although the new structures would be highly visible from this location, viewer response to changes in views from Viewpoint 8 ~~sensitivity~~ would be considered low to moderate given that views of the site would be of short duration for motorists and pedestrians traveling along Cesar Chavez Street, and the existing industrial uses would not be considered sensitive viewers. The Proposed Project, as seen from this location, would result in an increase in building density compared to existing conditions. However, the Proposed Project would improve the visual quality of the site by constructing architecturally cohesive modern structures and landscaping that would provide more visual unity on the site and replace deteriorated buildings.

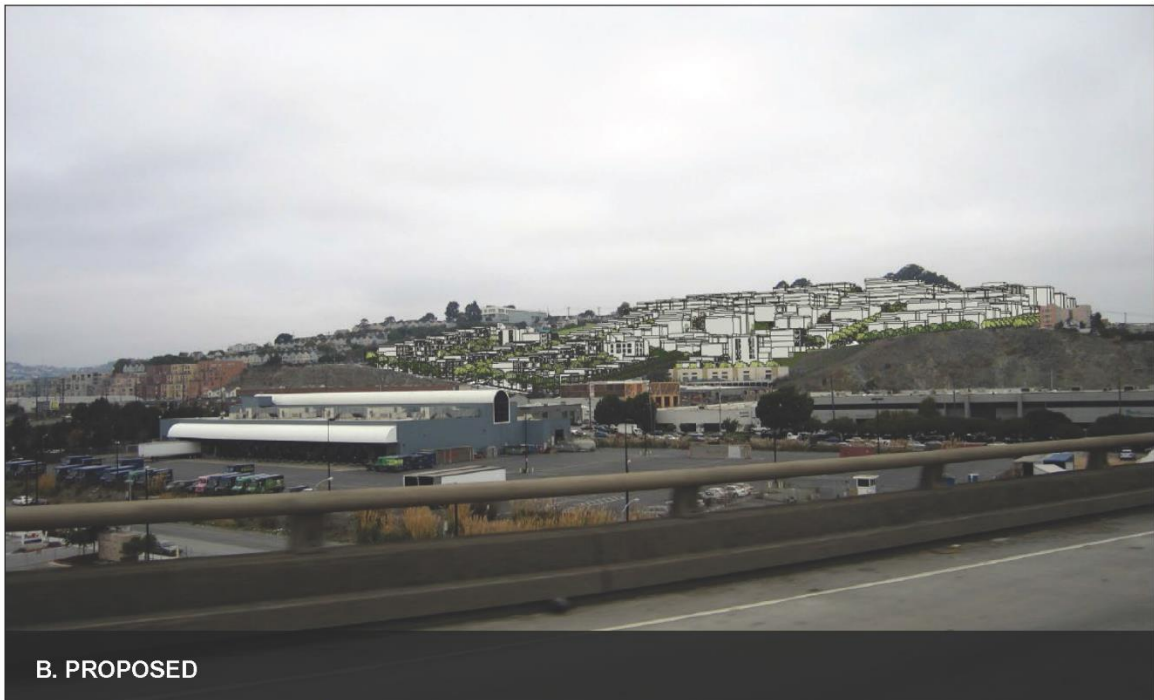
*I-280 (Viewpoint 9)*. ~~Figure 5.3-9~~~~Figure 5.3-15~~ Photo A shows the existing view of the Project site from I-280. Viewer response to changes in views from Viewpoint 9 ~~sensitivity~~ would be low, although viewer awareness of the Proposed Project would be moderate to high given the scale, massing, and density of the proposed structures, which would be increased compared to existing conditions. ~~Figure 5.3-9~~~~Figure 5.3-15~~ Photo B depicts the proposed buildings, which would range between 40 feet and 55 feet in height in this area. Industrial and warehouse buildings and storage units are located at the base of Potrero Hill. The hill rises almost vertically above the industrial parcels and the proposed housing units would be perched atop the hillside, similar to existing conditions. The height, massing, and density under the Proposed Project would increase, but would not block views of or damage any scenic resources as seen from I-280. The Project site is already developed with multi-colored, old housing stock on a site with a design layout that is inconsistent with its surroundings. The Proposed Project would replace these structures with new housing units and a street layout that is compatible with the neighborhoods that border the Project site.

Scenic resources that are visible from I-280 include the Bay, local hills, and distant ridgelines. The Proposed Project would not damage scenic resources of the built or natural environment that contribute to a scenic public setting within I-280. Motorists on I-280 traveling by the Project site do not have a view of any scenic resources, and do not have a high quality view of the Project site under existing conditions. In any event, motorists would be travelling through the area and the views are short-term. The intensity of the change would be less than significant given the low viewer sensitivity in the Project area. In addition, the Project site is already developed with similar uses as proposed under the Proposed Project.

F



A. EXISTING



B. PROPOSED

SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-15: PROPOSED PROJECT, VIEW FROM I-280 (VIEWPOINT 9)

**Overall Impacts on Neighborhood Character and Public View Corridors.** In general, the development of the new buildings and the addition of new landscaping would not be considered a substantial degradation of the existing visual character or quality of the Proposed Project and its surroundings. The Proposed Project would not substantially impact public views from the representative vantage points. New buildings would partially obstruct some public views that currently exist, but these views are of short duration given that motorists and pedestrians would be moving through the area.

The existing development pattern of the Project site is incoherent and includes outdated buildings in differing states of disrepair. The Proposed Project would add new, visually enhanced buildings that, at some vantage points, would be consistent with the height, bulk, and massing of residential uses to the north and west of the Project site. At other vantage points, as discussed above, the Proposed Project would introduce greater density than the immediately adjacent development. As a whole, the Proposed Project would add height, bulk, massing, and density to the Project site, which currently includes limited development relative to the size of the property.

Although not shown in the visual simulations, the Proposed Project would include street trees and landscaping that would buffer and soften visual impacts from the new structures. The Proposed Project would also underground existing utility wires and poles and would realign the streets into a grid pattern, similar to adjacent streets. Enhanced pedestrian and vehicular connections would increase street-level activity in the area and improve community interaction between the residents on the Project site and the surrounding community. With regard to view corridors, the effect would not be significant because views from the identified view corridors are of low to moderate quality and would be of short duration for motorists and pedestrians traveling along Project area streets. In addition, the Proposed Project would be required to adhere to the final Design Standards and Guidelines prepared for the Proposed Project and ultimately approved by the City would to ensure design consistency with existing development. The Proposed Project would improve onsite landscaping, remove existing utility wires, and provide enhanced linkages that would visually connect the Project site to the surrounding neighborhood.

In general, the Proposed Project would noticeably alter the visual character of the Project site compared to existing conditions; however, this impact would not be significant. While changes to the street grid, building configurations, landscaping, and other related elements would vastly alter its appearance, the visual quality of the Project site would generally be considered an improvement compared to existing conditions. Therefore, although the scale and residential density would increase at the Project site, the Proposed Project would not substantially degrade the existing visual character or quality of the site or the area or impact public view corridors. For the reasons stated above, the Proposed Project would result in *less-than-significant* impacts related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area.

<b>Impact AE-4</b>	<p><b>Alteration of the Land Form or Existing Features</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Proposed Project.</b></p> <p><b>NEPA: The Proposed Project would not substantially alter the land form or demonstrably destroy or alter the natural or man-made features. (Less than Significant)</b></p>
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The Project site is characterized by steep slopes and several rock outcroppings. When Potrero Terrace and Potrero Annex housing developments were originally developed, a substantial amount of excavation, fill, and grading was performed to establish building foundations and the road network that serves the Project site. As such, the existing topography of the Project site is significantly modified from its original natural, undeveloped state. The Proposed Project would require the grading of existing slopes at the Project site in order to realign the streets into a grid pattern. Grading of the Project site would alter the existing land form. However, the grid pattern street system and resulting development would visually enhance the Project site and allow it to blend with its surroundings.

Construction of the Proposed Project would remove all 254 existing trees at the Project site. There are no landmark trees or street trees at the site.<sup>12</sup> Any removal of these trees associated with the Proposed Project would require a permit as provided in Article 16, Section 806. Compliance with the *Public Works Code* would require replacement of all removed trees. Landscaping would also be included in the public and private open spaces, between buildings, along the streets, and in parking areas. Therefore, the Proposed Project would result in *less-than-significant* impacts on the alteration of existing land forms.

<b>Impact AE-5</b>	<p><b>Conformance to Locally Adopted Design Guidelines</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Proposed Project.</b></p> <p><b>NEPA: The Proposed Project would conform to locally adopted design guidelines. (Less than Significant)</b></p>
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As discussed above, the *San Francisco Planning Code* contains a number of provisions to ensure that Proposed Project design would protect the existing character of surrounding neighborhoods. These include Section 311 and the Residential Design Guidelines as well as Section 312 and the Neighborhood Commercial Design Guidelines. The Proposed Project would be subject to design principles contained in the General Plan, Zoning Ordinance, and applicable Area Plans, which are in effect to ensure that development in the City is of a high architectural standard, is compatible with its surroundings, and does not introduce substantial new sources of light and glare that could significantly impact sensitive receptors. During the design review process, the Proposed Project would be refined so that the development would not be out of character or scale with the surrounding

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<sup>12</sup> GLS Landscape/Architecture, Tree Disclosure Statement (June 23, 2010).



neighborhood and would not significantly detract from the existing natural or man-made surroundings. The Proposed Project would be required to conform to the design guidelines outlined in the *Planning Code*, resulting in *less-than-significant* impacts.

**Alternative 1 – Reduced Development Alternative**

<p><b>Impact AE-1</b></p>	<p><b>Effects on <u>Scenic Views</u></b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Reduced Development Alternative.</b></p> <p><b>NEPA: The Reduced Development Alternative would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. (Less than Significant <u>with Mitigation</u>)</b></p>
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Visual simulations have been prepared for the Reduced Development Alternative (Alternative 1). In the vicinity of the Project site, the views from portions of the Potrero Hill Recreation Center are considered scenic views with high viewer sensitivity due to the nature of the use and the views of the Bay, East Bay Hills, McLaren Ridge, and San Bruno Mountain from certain public areas of the park. Views from the Potrero Hill Recreation Center are of high visual sensitivity. Although these views although are undesignated, they are protected or popularly used or appreciated areas of aesthetics or recreational significance at the local level. Areas where viewer sensitivity would be considered low would be views from the sports field due to the context of the use. The Project site is visible from surrounding locations, such as from the edges of the Potrero Hill Recreation Center and along 23<sup>rd</sup> Street. However, the Project site is located on the side slopes of Potrero Hill and the heights of the existing buildings at the Project site allow for panoramic scenic vistas over the tops of the buildings and beyond to the Bay, East Bay Hills, and San Bruno Mountain. The tops of existing buildings can be seen from the edges of the Potrero Hill Recreation Center and along 23<sup>rd</sup> Street, but views from these locations are focused on the panoramic vistas and not on the Project site itself. Changes to these scenic views, as a result of the Alternative 1, are discussed below using the representative viewpoints. Although the Project site is visible from other surrounding locations, the Project site is not part of a scenic view as viewed from outside the site, because Potrero Hill blocks scenic views of any panoramic vistas beyond, and the existing view of the site itself is of low quality due to the deteriorated character of the existing development. Viewer response to the changes from the Proposed Project from Viewpoints 3 through 9 would be low, because there are no scenic vistas seen from these locations. Thus, the only scenic vistas that would be affected are the views from the Potrero Hill Recreation Center. The remainder of this impact analysis is focused on Viewpoints 1 and 2.

22<sup>nd</sup> Street Trail (Viewpoint 1). As shown in Figure 5.3-1 Photo A, the northern portion of the Recreation Center includes natural features and the 22<sup>nd</sup> Street Trail. Looking east, a channelized view of the Bay and East Bay Hills is provided through the dense vegetation. Viewer sensitivity would be high from this location, but the view would be of moderate quality given that it is somewhat restricted and narrow. Under Alternative 1, a small portion of the proposed 40-foot high buildings would be visible

from the trail (a separate visual simulation was not prepared for this vantage point for Alternative 1, because it would not be substantially different from the visual simulation prepared for the Proposed Project). From this vantage point, the proposed buildings intrude somewhat into the middleground views, which include urban development such as warehouses and industrial uses. However, the Bay and the East Bay Hills would still be as visible from this location as under existing conditions and would not be substantially obscured by the proposed buildings. As shown in Figure 5.3-1 and 5.3-2, the existing view from the northern portion of the Recreation Center at the eastern end of the 22<sup>nd</sup> Street Trail affords nearly panoramic views of the San Francisco downtown area, the Bay Bridge, the Bay, and the East Bay Hills. Viewer sensitivity would be considered high from this location and the view is considered to be of high quality given the high vividness, intactness, and relative unity of this viewpoint. Under Alternative 1, as depicted in Figure 5.3-1, Viewpoint 1A, the roof of the proposed building on Block R would be visible from this view at the eastern end of the 22<sup>nd</sup> Street Trail. However, due to the steep topography of the Project site, the proposed building would be located downslope and would not extend into the viewshed from this location. Thus, the Alternative 1 as seen from View 1A would not introduce new height and bulk into the existing vista and would not substantially block the views to the northeast. However, it would act to slightly open up the vista by removing the existing Potrero Annex building that is further upslope. Looking southeast from this vantage point, as shown in Figure 5.3-2, Viewpoint 1B, the proposed building at Block O would be visible and would partially block portions of the horizon currently visible from this viewer location. The building at Block O would comparatively add more height, mass, and bulk than the existing structures on site and the building would extend above eyelevel of a typical user of the trail. However, while the proposed building at Block O would add height into the viewshed, it would not introduce elements into a currently unobstructed view. As shown in Figure 5.3-2, Viewpoint 1B, existing buildings at the Annex site are currently present in the views from this location and the terrain near the trail, existing buildings, and mature trees along the trail block what would otherwise be a nearly panoramic view. The existing mature trees and terrain along the trail would remain and continue to obscure views from the trail when looking in this direction. The proposed buildings would follow the side slope of the hill and step down, but would not substantially block views beyond what is present under existing conditions. Since the introduction of the building at Block O would not substantially increase the amount of this view that is currently unobstructed, changes to this viewshed are not considered significant. The majority of the panoramic views of the Bay and the East Bay Hills would still be visible from the trail terminus and would not be substantially obscured by the proposed buildings.

It is important to note that the views of Alternative 1 would change as the viewer walks towards the site along the 22<sup>nd</sup> Street Trail. The development would appear larger the further downhill one travels and the view of the Bay and East Bay Hills would become increasingly obscured by intervening existing development. Nonetheless, as the viewer approaches the proposed buildings, the dense vegetation opens up and allows for some middleground and background views. As such, although the proposed buildings' height and massing would increase over existing conditions, this would not

represent a substantial change to the overall vista from this location. The intensity of the change would be less than significant as the viewer descends the trail.

~~Potrero Hill Recreation Center (Viewpoint 2). Figure 5.3-10 Photo A shows the existing view from the southern portion of the Recreation Center at the baseball field. Distant views of the higher elevations to the south, including McLaren Ridge and San Bruno Mountain, are visible from this location, partially obscured by foreground vegetation. Background views are also somewhat diminished by the chain link fence and vegetation and would be considered of low to moderate quality. Viewer sensitivity would be relatively low in this location, as the primary use of the area is field sports rather than scenic viewing. As shown in Figure 5.3-10 Photo B, the proposed buildings, which would be approximately 40 feet in height, would obscure a portion of the view of the ridgeline and would change the existing view from the southern area of the Recreation Center to one that features a built environment. Project landscaping would screen and soften a portion of the new buildings, but the visual character of the site would represent a substantial change as seen from this vantage point.~~ Figure 5.3-16 Photo A shows the existing view from the southern portion of the Recreation Center at the baseball field. Distant views of the higher elevations to the south, including McLaren Ridge and San Bruno Mountain, are seen from this location, are partially obscured by the chain-linked fence, dense vegetation along the perimeter of the Recreation Center, and utility pole and wires. Viewer sensitivity would be high from this location and the view would be of moderately high visual quality as described in Section 4.3.2, *Environmental Setting*. As shown in Figure 5.3-16 Photo B, the proposed buildings, which would be approximately 40 to 50 feet in height, would obscure the view of the ridgeline. Although limited channelized views of the McLaren Ridge and San Bruno Mountain would be provided between the proposed buildings, the height and mass of the proposed buildings would significantly change the existing view from the southern area of the Recreation Center from one that features predominantly natural landscapes to one that features a built environment. The existing relatedly intact views of the McLaren Ridge and San Bruno Mountain would be significantly obscured by the height of the proposed buildings under Alternative 1 and the visual quality would be reduced to moderate.

~~Although Alternative 1 would add buildings that are up to 10 feet taller than the existing buildings adjacent to the Recreation Center, these new buildings would not impact the scenic vista. The buildings would block some middleground urban development views and portions of the ridgeline. However, the new buildings would not represent a significant part of the overall view available from this location. As such, Alternative 1 would result in *less-than-significant impacts* on views of scenic resources and would not reduce public opportunities. In summary, from Viewpoint 1, viewer sensitivity is considered high and the proposed buildings would add some bulk into an already obstructed view to the southeast. Because the overall existing panoramic views of the San Francisco Downtown area, the Bay Bridge, the Bay, and the East Bay Hills would remain visible, the impact at~~





**A. EXISTING**



**B. PROPOSED**

SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
**FIGURE 5.3-16: REDUCED DEVELOPMENT ALTERNATIVE, CONNECTICUT STREET,  
LOOKING SOUTH (VIEWPOINT 2)**

Viewpoint 1 would not be significant. At Viewpoint 2, the Alternative 1 would add buildings taller than the existing buildings adjacent to the Recreation Center, and these new buildings would alter views of scenic vistas. Although channelized views of the ridgeline would be provided between the proposed buildings, these views would be limited and would still significantly block views and reduce public opportunities to view McLaren Ridge and the San Bruno Mountain.

Local Streets Surrounding the Project Site (Viewpoints 3 through 8). Alternative 1 would obscure and/or alter some existing private views from neighborhoods to the west of the Project site along 23<sup>rd</sup> Street and Wisconsin Street, to the extent that such views are now available from these roadway corridors. The proposed buildings would be located across the street from existing residences, similar in height to the existing buildings, and would replace longer-range public views from local roadways that are available across the site with shorter-range views of the proposed new buildings. The proposed change in public views from local streets could be experienced as an undesirable consequence for affected persons who have grown accustomed to existing visual conditions. The nature and experience of this change for each affected viewer would vary depending on the nature of the existing view across the Project site, the position and proximity of the proposed new buildings, and the subjective sensitivity of the viewer. The existing scenic vista views of the McLaren Ridge and San Bruno Mountain would be partially obscured by the height of the proposed buildings along portions of 23<sup>rd</sup> Street and Wisconsin Street where such views currently exist. However, the alteration or interruption of views from public roadways is a commonly expected and experienced consequence of new construction within a densely populated urban setting. Although Alternative 1 would obstruct scenic views, it would redevelop and transform a visually deteriorating area within the Project vicinity and improve visual conditions at the site. In addition, while not depicted in the simulations, street trees would be planted that would soften and reduce the apparent scale of proposed buildings so that the new development appears to be a visual extension of existing development. Lastly, view corridors down local streets would be maintained and improved, in some cases, by reducing the amount of visible utilities and framing views, as shown in Figures 5.3-16 through 5.3-19. In some cases, the Proposed Project would obscure views of industrial areas near I-280 (refer to Figure 5.3-12), which may be deemed desirable to some viewers. Alternative 1 would also introduce new view corridors by adopting a grid pattern consistent with surrounding areas.

Private Views Surrounding the Project Site. Private views are not considered scenic under the City's significance criteria, but are discussed here for informational purposes. Alternative 1 would obscure and/or alter some existing private views from neighborhoods to the west of the Project site located along 23<sup>rd</sup> Street and Wisconsin Street, to the extent that such views are now available from residences. Currently, these residences have some background views of the Bay and distant hills and ridgelines facing east and south. Alternative 1 would partially block these views. Alternative 1 would replace longer-range private views across the site with shorter-range views of the proposed new buildings. The proposed change in private views could be experienced as an undesirable consequence for affected persons who have grown accustomed to existing visual conditions. The nature and

experience of this change for each affected viewer would vary depending on the nature of the existing view across the Project site, the position and proximity of the proposed new buildings within the private view, and the subjective sensitivity of the viewer. The alteration or interruption of private views is a commonly expected and experienced consequence of new construction within a densely populated urban setting. A project would only be considered to have a significant effect on views of scenic resources if it were to substantially degrade or obstruct public scenic views observed from public areas. The changes to private views resulting from Alternative 1 would not be considered an adverse aesthetic effect under NEPA.

As such, Alternative 1 would result in a *significant impact* to the views of scenic resources and would generally reduce public opportunities to view scenic resources. Implementation of Mitigation Measure M-AE-1 would reduce this significant impact to a *less-than-significant* level as it would reduce heights on Blocks J and K by 10 feet. Implementation of this mitigation measure would allow views of the ridgeline to remain largely visible. Figures 5.3-5 through 5.3-7 depict visual simulations of the modified reduced height scenario as prescribed by Mitigation Measure M-AE-1. Although the built elements of Alternative 1 would be introduced into the foreground and would block some middleground urban development views, long-range views of the McLaren Ridge and the San Bruno Mountain scenic resources would still be visible from this viewpoint with the reduced building heights. Thus, with implementation of Mitigation Measure M-AE-1, Alternative 1 would not substantially block or disrupt views of scenic resources or reduce public opportunities to view scenic resources.

<b>Impact AE-2</b>	<p><b>Effects on Visual Character during Construction</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Reduced Development Alternative.</b></p> <p><b>NEPA: The Reduced Development Alternative would potentially introduce elements that are out of character or scale with the existing physical environment or detract from the aesthetic appeal of the surrounding area during construction. (Less than Significant)</b></p>
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During the construction phases of Alternative 1, construction vehicle and equipment staging areas, exposed building pads, storage trailers, open trenches, debris piles, and roadway bedding and equipment would be visible on or near the Project site. Construction equipment would be visible from certain perimeter roadways around the Project site, particularly Wisconsin Street, 23<sup>rd</sup> Street, 25<sup>th</sup> Street, Pennsylvania Avenue, and Connecticut Street. Construction equipment would not be located or extend to a height that would obstruct any views of nearby natural resources or scenic vistas. The exception would be if cranes are utilized, but given the nature of this piece of equipment (tall and very narrow in appearance), it would not substantially obstruct any scenic views.

Construction of Alternative 1 is anticipated to occur over an approximately ten-year period. During the construction stage for Alternative 1, there would be temporary visual impacts from the demolition

of existing buildings, the assembly of new structures, equipment staging, and from the presence of out-of-character elements such as construction materials and materials stockpiles. However, aesthetic effects during construction would be temporary and would be *less than significant*.

Further, as under the Proposed Project, Implementation of Improvement Measure IM-AE-2a would ensure that all construction staging areas would not be visible from street level; ensure cleanliness of the construction site, surrounding streets, construction equipment that are stored or driven beyond the construction area; and that the City would review and approve a plan for construction staging, access, and parking prior to issuance of a building permit. With implementation of Improvement Measure IM-AE-2a, construction-related impacts would continue to be *less than significant*.

<b>Impact AE-3</b>	<p><b>Effects on Visual Character during Operation</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Reduced Development Alternative.</b></p> <p><b>NEPA: The Reduced Development Alternative would not introduce elements that are out of character or scale with the existing physical environment and detract from the aesthetic appeal of the surrounding area during operation. (Less than Significant)</b></p>
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**Impacts on On-Site Character or Quality.** For a detailed description of the existing visual character of the Project site, please refer to Impact AE-4 for the Proposed Project. As with the Proposed Project, Alternative 1 would replace the existing aging structures with new, visually improved buildings. With implementation of Alternative 1, the Terrace site and the Annex site would be developed with up to 1,280 residential units that would consist of townhomes, townhomes over flats, and stacked flats. The buildings would not exceed 40 feet in height. Commercial uses and community facilities would also be developed.

In addition, open space elements would be incorporated into the Project site. Under the Alternative 1, public and private open space would be the same as the Proposed Project at approximately 7 acres. All 254 existing trees at the Project site would be removed. There are no landmark trees or street trees at the site.<sup>13</sup> Any removal of these trees associated with the Proposed Project would require a permit as provided in Article 16, Section 806. Compliance with the *Public Works Code* would require replacement of all removed trees. In addition, the existing curvilinear streets would be replaced with a grid pattern street system that would visually enhance the Project site.

Alternative 1 would increase on-site building height, massing, and bulk compared to existing conditions. However, Alternative 1 would improve the current on-site visual setting. Alternative 1 would replace the existing older structures with enhanced landscaping, bicycle/pedestrian amenities, and modern structures that would complement the existing surroundings. Design of this alternative

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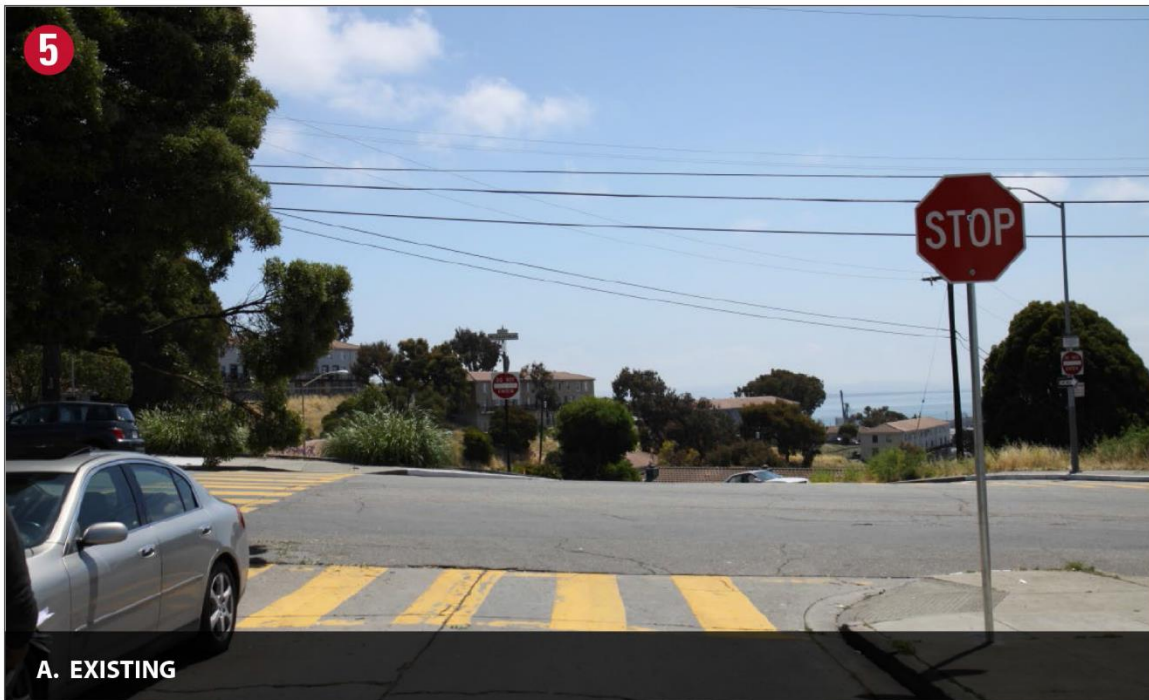
<sup>13</sup> GLS Landscape/Architecture, Tree Disclosure Statement (June 23, 2010).

would relate to the context of its surroundings by creating contiguous landscape areas and buildings that reflect a similar architectural design. The potential signage and street furniture to be installed as part of the Proposed Project is currently unknown. However, applying the City's Design Guidelines would ensure that these features would be in character with existing architectural styles and would not differ in materials, color, or style in an inappropriate manner.

**Impacts on Public View Corridors.** Existing view corridors include views of the Project site from nearby streets, adjacent residential neighborhoods, and Starr King Elementary School. The streets bordering the Project site that could be impacted by Alternative 1 include 23<sup>rd</sup> Street, 24<sup>th</sup> Street, 25<sup>th</sup> Street, Wisconsin Street, and Connecticut Street, similar to the Proposed Project. The massing simulations presented in Figure 5.3-1 and 5.3-2 (Viewpoint 1), ~~Figure 5.3-3~~ Figure 5.3-9 (Viewpoint 3), (Viewpoint 4), ~~Figure 5.3-6~~ Figure 5.3-12 (Viewpoint 6), and ~~Figure 5.3-7~~ Figure 5.3-13 (Viewpoint 7), above, would be generally the same under Alternative 1 as for the Proposed Project and are not reproduced here for the Alternative 1. The heights of the buildings for Alternative 1 would not exceed 40 feet. Due to distance and topography, the difference in a 10-foot height reduction is barely perceptible. Therefore, the analysis for the Proposed Project for these identified vantage points would also be applicable to Alternative 1 and the impacts would be *less than significant*. The following analysis considers those vantage points where the impacts of Alternative 1 would be different from those of the Proposed Project. These include Viewpoints 5, 8, and 9. Viewpoints 1 and 2 have been analyzed under Impact AE-1 (scenic vistas).

*Intersection of 24<sup>th</sup> Street and Wisconsin Street (Viewpoint 5).* As depicted in Figure 5.3-~~11-17~~ Photo A, the existing view from the intersection of 24<sup>th</sup> Street and Wisconsin Street (adjacent to Starr King Elementary School) consists of the buildings and mature vegetation at the Project site and extremely limited channelized views of the Bay. Implementation of Alternative 1 (Figure 5.3-~~11-17~~ Photo B) would construct several 40-foot-tall buildings to the north of 24<sup>th</sup> Street. Alternative 1 at this vantage point would consist of buildings with less height and bulk than the Proposed Project, which would include two buildings at 65 feet in this area. Similar to the Proposed Project, Alternative 1 would grade the existing site and realign the existing curvilinear streets into grid streets; new view corridors of the Bay would be provided from this location. Although the buildings to the north of 24<sup>th</sup> Street would increase mass and bulk in this location, the buildings to the south of 24<sup>th</sup> Street would be stepped downhill, making them appear smaller. The proposed buildings would continue to allow for intermittent views of the Bay all along the street.





SOURCE: Van Meter Williams Pollack LLP., 2015.

**POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)**  
**FIGURE 5.3-17: REDUCED DEVELOPMENT ALTERNATIVE, 24TH STREET AT WISCONSIN STREET, LOOKING EAST (VIEWPOINT 5)**

*Intersection of Cesar Chavez Street and Connecticut Street (Viewpoint 8).* As shown in Figure 5.3-12-18 Photo A, foreground views from the intersection of Cesar Chavez Street and Connecticut Street include light industrial and warehouse buildings and some of the existing structures at the Project site. Figure 5.3-12-18 Photo B represents the view from this location with implementation of Alternative 1. Channelized views of distant hills are seen. With implementation of Alternative 1, new housing would be added to the west of Wisconsin Street at a height of up to 40 feet. These multi-family buildings would be similar in height and compatible in massing with the existing single-family residential development in the area. A substantial portion of the existing channelized background view would be retained, and no other major views would be obscured from this location.

Overall, the development of the new buildings and the addition of new landscaping would not be considered a substantial degradation of the existing visual character or quality of Alternative 1 and its surroundings. Alternative 1 would comply with City standards and would ensure that future development is visually compatible with the character of the surrounding area. These guidelines would also ensure that building heights, building/open space relationships, ground floor uses, and circulation patterns are of higher quality and function than existing conditions. During the design review process, Alternative 1 would be refined so as to ensure that the development would not be out of character or scale with the surrounding neighborhood and would not significantly detract from the existing natural or man-made surroundings.

*I-280 (Viewpoint 9).* The portion of I-280 that runs adjacent to Potrero Hill is eligible for a scenic highway designation. Unobstructed views of the Annex site are visible from southbound and northbound I-280 near Pennsylvania Avenue and 23<sup>rd</sup> Street. Figure 5.3-13-19 Photo A shows the existing view of the Project site from Pennsylvania Avenue and 23<sup>rd</sup> Street. Figure 5.3-13-19 Photo B depicts the proposed buildings, which would be no more than 40 feet in height.

As noted for the Proposed Project, viewer sensitivity would be low, although viewer awareness would be moderate to high given the scale and massing of the proposed structures, which would be increased compared to existing conditions. Industrial and warehouse buildings and storage units are located at the base of Potrero Hill. The height, massing, and density under Alternative 1 would increase, but would not block or damage any scenic resources as seen from I-280. Alternative 1 would replace old structures with new housing units, and a street layout that is compatible with neighborhoods that border the site.

Alternative 1 would not damage scenic resources of the built or natural environment that contribute to a scenic public setting within the I-280. Motorists on I-280 do not have a high quality view of the Project site under existing conditions and, in any event, would be travelling through the area and the views are short-term. The intensity of the change would not be significant given the low viewer sensitivity in the Project area. In addition, the Project site is already developed with similar uses as proposed under the Proposed Project.



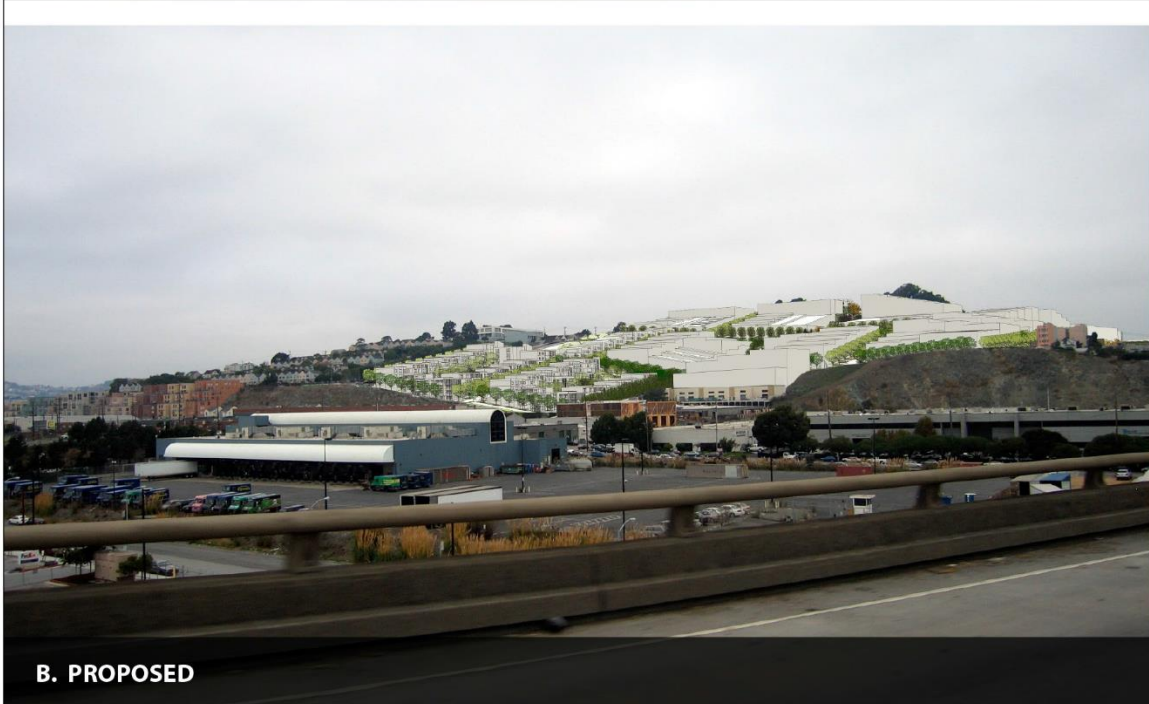
SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-18: REDUCED DEVELOPMENT ALTERNATIVE, CONNECTICUT STREET AT CESAR CHAVEZ STREET,  
LOOKING NORTH (VIEWPOINT 8)





**A. EXISTING**



**B. PROPOSED**

SOURCE: Van Meter Williams Pollack LLP., 2015.

POTRERO HOPE SF MASTER PLAN (CASE NO. 2010.0515E)  
FIGURE 5.3-19: REDUCED DEVELOPMENT ALTERNATIVE, I-280,  
LOOKING NORTHWEST (VIEWPOINT 9)

<b>Impact AE-4</b>	<p><b>Alteration of the Land Form or Existing Features</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Reduced Development Alternative.</b></p> <p><b>NEPA: The Reduced Development Alternative would not substantially alter the land form or demonstrably destroy or alter the natural or man-made features. (Less than Significant)</b></p>
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The Project site is characterized by steep slopes and several rock outcroppings. However, since the existing topography of the Project site has been significantly modified from its original natural state, Alternative 1 would not significantly alter natural features. Alternative 1 would require the grading of existing slopes at the Project site in order to realign the streets into a grid pattern. However, the grid pattern street system would visually enhance the Project site and allow it to blend with its surroundings.

Construction of Alternative 1 would remove all existing trees at the Project site. Any removal of these trees associated with Alternative 1 would require a permit as provided in Article 16, Section 806. Compliance with the *Public Works Code* would require replacement of all removed trees. Landscaping would also be included in the public and private open spaces, between buildings, along the streets, and in parking areas. Therefore, Alternative 1 would result in *less-than-significant* impacts on the alteration of existing land forms.

<b>Impact AE-5</b>	<p><b>Conformance to Locally Adopted Design Guidelines</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Reduced Development Alternative.</b></p> <p><b>NEPA: The Reduced Development Alternative would conform to locally adopted design guidelines. (Less than Significant)</b></p>
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Alternative 1 would be subject to design guidelines contained in the General Plan, Zoning Ordinance, and applicable Area Plans, which are in effect to ensure that development in the City is of a high architectural standard, is compatible with its surroundings, and does not introduce substantial new sources of light and glare that could impact sensitive receptors. Alternative 1 would be required to conform to the design guidelines in order to promote design that would protect existing neighborhood character, resulting in *less-than-significant* impacts.

**Alternative 2 – Housing Replacement Alternative**

As part of the Housing Replacement Alternative (Alternative 2), all existing housing units at the Project site would be demolished and rebuilt using the same building pattern that currently exists. The existing site plan and street pattern at the Project site would be retained. As such, this alternative would reconstruct 620 housing units, preschool center, daycare center, and residential parking facilities. Therefore, the overall visual conditions at the site would not change, no background views

would be blocked, and density would not increase. Alternative 2 would be inconsistent with the surrounding neighborhoods to the north and west due to curvilinear streets and limited street-level activity and community interaction. However, the Project site conditions would improve with replacement of the outdated existing buildings and the addition of new landscaping. The modern design of Alternative 2 would help the proposed buildings relate to the context of its surroundings.

Alternative 2 would not add new massing and density to the Project site, but would generally improve visual conditions. As such, this alternative would result in *less-than-significant impacts* on views of scenic resources, public opportunities to view scenic resources, and consistency with the surrounding established built environment, alteration of the existing land form, and conformance to locally adopted design guidelines. The overall impacts would not be significant since this alternative would simply replace existing housing and would not result in greater height, bulk, massing, or density compared to existing conditions.

Alternative 2 would still involve construction at the Project site. Construction materials on the Project site during construction phases would introduce elements that are out of character with the existing environment, which includes adjacent residential uses. Therefore, the impact regarding aesthetic appeal during construction would be *significant*, even though the effect would be temporary. Implementation of Improvement Measure IM-AE-2a would ensure that all construction staging areas would not be visible from street level; ensure cleanliness of the construction site, surrounding streets, construction equipment that are stored or driven beyond the construction area; and that the City would review and approve a plan for construction staging, access, and parking prior to issuance of a building permit. With implementation of Improvement Measure IM-AE-2a, the impact on visual quality during construction would be *less than significant* as it would be a temporary condition.

### ***Alternative 3 – No Project Alternative***

The No Project Alternative (Alternative 3) would result in the same conditions at the Project site as existing. No buildings would be constructed and no new housing would be provided. No construction or staging would occur that would impact the temporary visual character. Although no existing views would be blocked and the height and massing would not be increased under the No Project Alternative, the conditions at the Project site would not be improved. The current aging buildings and the sparse, unkempt landscaping would remain. The Project site under the No Project Alternative would continue to be inconsistent with its surroundings. Nonetheless, since the conditions would not change, the No Project Alternative would result in *no impact* on views of scenic resources, public opportunities to view scenic resources, consistency with the surrounding established built environment, alteration of the existing land form, and conformance to locally adopted design guidelines.

**Cumulative Impacts**

The geographic context for cumulative aesthetic impacts is generally confined to areas visible to and from the Project site that could combine to cause a cumulative impact. For the Proposed Project, the cumulative context includes potential development under the Eastern Neighborhoods Community Plans, with general focus on the Showplace Square/Potrero Area Plan. In addition, the geographic context includes the neighborhoods between the Project site and the Bay, since these areas are visible from the Project site.

<p><b>Impact C-AE-1</b></p>	<p><b>Aesthetics Cumulative Impact</b></p> <p><b>CEQA: This topic is not applicable under CEQA for the Proposed Project.</b></p> <p><b>NEPA: The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to aesthetics. (Less than Significant)</b></p>
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For the purposes of this cumulative analysis, the Proposed Project, rather than its alternatives, will be analyzed. As explained above, due to the proposed building heights and development intensity, the Proposed Project would have a greater visual impact than any of its alternatives. As such, this cumulative analysis focuses on the cumulative impacts of the Proposed Project, since it represents the most conservative scenario.

There are two known or reasonably foreseeable projects expected to be developed in the identified geographic context. These include the Candlestick Point–Hunters Point Shipyard Phase II project, which would result in several high-rise buildings on the waterfront that would be visible from the Project site. The second project proposes to construct 240 to 256 dwelling units at 650 Texas and 790 Pennsylvania Avenue, which is proximate to the Project site. These projects’ effects could combine with the effects of the Proposed Project to result in a significant cumulative impact to aesthetics.

The Candlestick Point-Hunters Point Shipyard Project has been approved and the proposed buildings along the waterfront will likely be visible from the Project site. This project has been identified to obstruct some views of the Bay, but these views are held from vantage points closer to the waterfront. The Project site is too far distant for the proposed high-rises to combine with project effects to further obstruct scenic views of the Bay. The Proposed Project would have a *significant* impact on scenic views of the McLaren Ridge and the San Bruno Mountain. However, with implementation of Mitigation Measure M-AE-1, the proposed building heights would be reduced to maintain the view of the ridgeline and sightline to these scenic vistas (the McLaren Ridge and the San Bruno Mountain) from the Project site. The high-rise buildings proposed as part of the Candlestick Point–Hunters Point Shipyard Phase II project and the Project’s proposed buildings would not combine to substantially affect the same scenic resources. In addition, the Proposed Project would have a *less-than-significant* impact on views of scenic resources, as identified in this section. Therefore, there would be no significant less-than-significant cumulative impact with regard to views of scenic resources.

Changes to the character or scale of the existing physical environment combine only with those projects that are relatively close to the Project site. All development projects in the City are subject to design guidelines contained in the General Plan, Zoning Ordinance, and applicable Area Plans, which are in effect to ensure that development in the City is of a high architectural standard and is compatible with its surroundings. Therefore, there would not be a substantial cumulative impact in the City from past, present, and reasonably foreseeable development to which the Proposed Project could contribute.

Improvement Measure IM-AE-2a would reduce the significant construction impacts on visual character and quality. Although the Proposed Project would increase the density at the Project site, these impacts would not be significant and the visual impacts associated with increased density would not combine with other reasonably foreseeable projects in the area. The Proposed Project would have less-than-significant impacts on views of scenic resources, public opportunities to view scenic resources, consistency with the character the existing physical environment, and aesthetic appeal of the surrounding area. Therefore, the cumulative impacts would be *less than significant*.

## 5.6 CULTURAL AND PALEONTOLOGICAL RESOURCES

The impact summaries on pages 5.6-16 through 5.6-18 have been revised as follows:

### *Proposed Project*

<b>Impact CP-3</b>	<p><b>Effects on Paleontological Resources</b></p> <p><b>CEQA: The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b></p>
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In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of the Proposed Project to paleontological resources to *less than significant with mitigation* under CEQA and NEPA because it would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for the Proposed

Project is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from the Proposed Project would be *less than significant with mitigation* under CEQA and NEPA.

The impact analysis on page 5.6-21 has been revised as follows:

**Alternative 1 – Reduced Development Alternative**

<b>Impact CP-3</b>	<p><b>Effects on Paleontological Resources</b></p> <p><b>CEQA: The Reduced Development Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Reduced Development Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b></p>
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Alternative 1 would result in the same extent of ground disturbance as the Proposed Project. As described in Section 4.16, *Geology and Soils*, the rock unit underlying the Project site is serpentine. Fossils are not expected to be found in the rock or the soils on the Project site. In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of Alternative 1 on paleontological resources to *less than significant with mitigation* under CEQA and NEPA.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for the Proposed Project is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from Alternative 1 would be *less than significant with mitigation* under CEQA and NEPA.

## **Alternative 2 – Housing Replacement Alternative**

The impact analysis on pages 5.6-24 through 5.6-24 has been revised as follows:

<b>Impact CP-3</b>	<p><b>Effects on Paleontological Resources</b></p> <p><b>CEQA: The Housing Replacement Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Housing Replacement Alternative could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)</u></b></p>
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Alternative 2 would result in less ground disturbance than the Proposed Project, but the majority of the site would still be affected. As described in Section 4.16, *Geology and Soils*, the rock unit underlying the Project site is serpentine. Fossils are not expected to be found in the rock or the soils on the Project site. In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-3a would reduce impacts of Alternative 2 to paleontological resources to *less than significant with mitigation* under CEQA and NEPA because it would not directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature.

Serpentine bedrock forms the core of most of the hills in San Francisco and therefore is not considered a unique geologic feature of the Project site. Further, the APE for Alternative 2 is highly developed and, therefore, any other unique geologic features would have been previously disturbed. As such, impacts from Alternative 2 would be *less-than-significant with mitigation* under CEQA and NEPA.

### Cumulative Impacts

The impact analysis on pages 5.6-28 through 5.6-29 has been revised as follows:

<p><b>Impact C-CP-3</b></p>	<p><b>Cumulative Effects on Paleontological Resources</b></p> <p><b>CEQA: The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to paleontological resources. (Less than Significant with Mitigation)</b></p> <p><b><u>NEPA: This is not a topic covered under NEPA. The Proposed Project and its alternatives, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to paleontological resources. (Less than Significant with Mitigation)</u></b></p>
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Several sections of the California State PRC protect paleontological resources. Section 5097.5 of the PRC prohibits “knowing and willful” excavation, removal, destruction, injury, and defacement of any paleontological feature on public lands (lands under state, county, city, district, or public authority jurisdiction, or the jurisdiction of a public corporation), except where the agency with jurisdiction has granted permission. Through compliance with the PRC, overall cumulative impacts are considered less than significant. As described in Impact CP-3, above, the Proposed Project would not result in an adverse impact on paleontological resources. Further, adherence to Mitigation Measure M-CP-3a would ensure that in the event that paleontological resources are discovered during construction of the Proposed Project, all necessary steps would be taken to limit impacts on such resources. Therefore, the Proposed Project would not make a significant cumulative contribution to potential impacts on paleontological resources. The Proposed Project and its alternatives and all of the cumulative projects listed in Section 5.1 have been or would be required to adhere to State laws concerning the protection and appropriate treatment of paleontological resources. As such, under CEQA and NEPA, the contribution of the Proposed Project and its alternatives to cumulative effects on paleontological resources would be *less than significant with mitigation*. The Proposed Project and its alternatives’ incremental contribution to these cumulative effects would not be cumulatively considerable.

## 5.9 AIR QUALITY

Page 5.9-6 of the Draft EIR/EIS has been revised to indicate that the determination that the Project is not located in an air pollutant exposure zone is based on the 2014 version of the map.

Based on DPH’s ~~latest guidance document (March 2014)~~ April 2014 Air Pollutant Exposure Zone Map for implementation of this ordinance, the Proposed Project would not be required



to install an enhanced ventilation system capable of removing 80 percent of ambient outdoor PM2.5 concentrations from habitable areas of residential units.

The City has modified Mitigation Measure M-AQ-2a to the Draft EIR/EIS to require the project applicant meet 2010 engine standards for on-road trucks during construction. This mitigation measure has also been revised to require that backup diesel generators adhere to the same emission standards as construction equipment based on comments discussed further below. This revision does not change the significance conclusions of the Draft EIR/EIS.

**Mitigation Measure M-AQ-2a – Utilize Efficient Construction Equipment at the Start of Construction.** For construction activities occurring in year 2015, all off-road construction equipment greater than 50 horsepower (hp) shall have engines that meet or exceed USEPA or ARB Tier 3 off-road emission standards, or the project applicant must prepare a construction emissions minimization plan designed to reduce NOx by a minimum of 39 percent from Tier 2 equivalent engines. In addition, for the Project construction period, all trucks that haul materials to and from the Project site shall have engines that meet or exceed ARB 2010 On-Road Engine Standards to the extent feasible. Where access to alternative sources of power are available, backup diesel generators shall be prohibited. If access to alternative sources of power is not available, backup diesel generators shall meet USEPA Tier 4 Interim emissions standards.

Mitigation Measure M-AQ-2b on Page 5.9-21 of the Draft EIR/EIS has been revised to include additional requirements that the project applicant use grid energy for or meet Tier 4 interim standards for diesel back-up generators. This revision does not change the significance conclusions of the Draft EIR/EIS.

**Mitigation Measure M-AQ-2b – Utilize More Efficient Construction Equipment after 2016.** For all construction occurring after 2016, all off-road construction equipment greater than 50 hp shall have engines that meet or exceed USEPA or ARB Tier 4 interim off-road emission standards, or the project applicant must prepare a construction emissions minimization plan designed to reduce NOx by a minimum of 21 percent from Tier 3 equivalent engines. Where access to alternative sources of power are available, backup diesel generators shall be prohibited. If access to alternative sources of power is not available, backup diesel generators shall meet USEPA Tier 4 Interim emissions standards.

## 5.10 GREENHOUSE GAS EMISSIONS

Table 5.10-2 on page 5.10-16 has been revised to correctly state the requirements of the San Francisco Green Building Ordinance.

The Proposed Project would be subject to and would comply with GHG reduction measures as shown in Table 5.10-2.

<b>Table 5.10-2 City Greenhouse Gas Regulations Applicable to the Proposed Project and Alternatives</b>	
<i>Regulation or Program</i>	<i>Requirement</i>
San Francisco Green Building Requirements for Stormwater Management	Requires all new development or redevelopment disturbing more than 5,000 sf of ground surface to manage stormwater on-site using low impact design. Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City's stormwater ordinance <del>and stormwater design guidelines.</del>

\*\* The technical appendix detailing the Project Greenhouse Gas Emissions Inventory, was inadvertently omitted from the Draft EIR/EIS and is included here as Appendix A.

## 5.11 WIND AND SHADOW

The following text has been added to Impact WS-2 on page 5.11-6 of the Draft EIR/EIS:

The Proposed Project buildings would cast shadows on the walking paths on the southern edge of the Potrero Hill Recreation Center at sunrise on December 20<sup>th</sup> (Figure 5.11-7). The shadows would recede but continue to cast a minimal shadow until 10:00 AM on December 20<sup>th</sup> (Figure 5.11-5). As shown in Figure 5.11-6, Proposed Project buildings would also cast net new shadow on the walking paths on the southwestern edge of the Potrero Hill Recreation Center from approximately 3:00 PM until sunset on December 20<sup>th</sup>. The Proposed Project would cast shadows along the southwestern edge of the park during the spring and summer from one hour after sunrise but would recede by 9:00 AM.

## 5.13 UTILITIES AND SERVICE SYSTEMS

In response to comments received, the following text on page 5.13-3 has been revised to note the deadline extension for the 2015 UWMP.

### ***Urban Water Management Planning Act***

In 1983, the California Legislature enacted the Urban Water Management Planning Act (*Water Code, Section 10631*). The act states that every urban water supplier that provides water to 3,000

or more customers, or that provides over 3,000 acre-feet of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. A water supplier is required to prepare an Urban Water Management Plan (UWMP) to document water supplies available during normal, single dry, and multiple dry water years during a 20-year projection and the existing and projected future water demand during a 20-year projection. The water supplier must update the Urban Water Management Plan every 5 years (by December 31 in years ending in five and zero). The deadline for submittal of the 2015 UWMP to the California Department of Water Resources has been postponed to July 1, 2016. The SFPUC's 2010 UWMP was adopted on June 14, 2011.

The following text has been added to page 5.13-2 to provide a description for Senate Bill 221.

### **Senate Bill 610 and Senate Bill 221**

The State of California, through the passage of Senate Bill 610, requires that a jurisdiction prepare a Water Supply Assessment (WSA) for development projects that meet certain criteria, including a project that creates demand for 500 or more housing units. The SFPUC prepared a WSA for the Proposed Project (see Appendix 4.13 of this Draft EIR/EIS), as described under Impact UT-3, below. Senate Bill 221 prohibits approval of subdivisions consisting of more than 500 dwelling units unless there is verification of sufficient water supplies for the project from the applicable water supplier(s). This requirement also applies to increases of 10 percent or more of service connections for public water systems with fewer than 500 service connections. The law defines criteria for determining "sufficient water supply" such as using normal, single-dry, and multiple-dry year hydrology and identifying the amount of water that the supplier can reasonably rely on to meet existing and future planned use.

The following text on page 5.13-5 through 5.13-6 has been revised to correctly state the requirements of the San Francisco Green Building Ordinance and Stormwater Management Ordinance.

### **San Francisco Green Building Ordinance**

In 2008, the City adopted the San Francisco Green Building Ordinance (SFGBO) as Chapter 13C, *Green Building Requirements*, of the San Francisco Building Code. The purpose of the SFGBO is to promote the health, safety, and welfare of San Francisco residents, workers, and visitors by minimizing the use and waste of energy, water, and other resources in the construction and operation of the buildings within the City; and by providing a healthy indoor environment. This requires green building practices and LEED certification for new residential and commercial buildings in the city.

For site permits received on or after July 1, 2012, residential development will be required to achieve the following minimum standards:

- New High-Rise Residential (5 or more units and 75 feet or more in height to the highest occupied floor) – 75 GreenPoint Rated (GPR) points or 50 LEED points
- All Other New Residential (1 or more units and less than 75 feet in height to highest occupied floor) – 75 GPR points or LEED Silver.

The SFGBO requires compliance with the applicable LEED performance standards or GreenPoint Rated checklists (which applies mostly to residential buildings) for New Construction, Version 2.2, criteria SS6.1 and SS6.2 for storm water management, as well as the BMPs and Stormwater Design Guidelines (SDG) of the SFPUC (1304C.0.3). Additionally, for high-rise residential buildings (1304C.1.3), new group B (Business) and M (Mercantile) occupancy buildings (1304C.2), and new large commercial buildings (1304C.2.2), water efficient landscaping (LEED WE1.1) and water conservation are required (LEED WE3.2).

~~LEED SS6.1, Stormwater Design: Quantity Control, addresses stormwater management and has been adopted by the San Francisco SDG for combined sewer areas. The intent of this credit is to limit disruption of stormwater runoff by reducing impervious cover, promoting infiltration, reducing or eliminating pollution from stormwater runoff, and eliminating contaminants.~~

**Stormwater Management Ordinance**

The San Francisco Stormwater Management Ordinance became effective May 22, 2010. The intent of the Stormwater Management Ordinance is to protect and enhance the water quality in the City and County of San Francisco’s sewer system, stormwater collection system and receiving waters pursuant to, and consistent with federal and state laws, lawful standards, and orders applicable to stormwater and urban runoff control, and the City’s authority to manage and operate its drainage systems. The Stormwater Management Ordinance is enforced through implementation of the SDG, ~~described under SFGBO, above.~~

The following text on page 5.17-13 has been revised to avoid incorrect reference to Stormwater Management Ordinance requirements.

~~According to the SFPUC’s Stormwater Management Ordinance, if the project disturbs greater than 5,000 square feet of land due to the demolition of housing and roads, the City is required to~~ The Project proposes to implement BMPs (i.e., LID measures) to capture and treat rainfall. These measures will help improve drainage patterns within and around the Project site. As identified in Chapter 2, *Project Alternatives and Project Description*, and in 5.17-1, the Proposed Project may include the following stormwater management strategies: These strategies are outlined in the *Design Standards and Guidelines* (Design Guidelines) document prepared for the Proposed Project.

The following text on page 5.13-14 has been revised address comments from the SFPUC. Footnote nine was moved to the end next sentence.

The SFPUC recently adopted the 2010 UWMP, which provides water demand projections for the City and County of San Francisco through the year 2035. These projections are based on Association of Bay Area Governments (ABAG) *Projections 2009* and *ABAG Sustainable Communities Strategy Baseline Update 2010*, which provide projected growth for the city through the year 2035. In coordination with the adoption of the 2010 UWMP, the SFPUC also adopted a resolution affirming that future development in the City and County of San Francisco had been incorporated into the UWMP's water demand projections. However, in 2012, the San Francisco Planning Department updated its Land Use Allocation (LUA 2012) increased the estimated number of new dwelling units and jobs over the previous LUA 2009 projections. Due to the LUA 2012 projections, the SFPUC came to the conclusion that its 2010 UWMP no longer accounts for every project requiring a WSA. Therefore, the Proposed Project is required to prepare a WSA that documents the SFPUC's current and projected water supplies when compared to demands associated with the LUA 2012 projections. Water projections associated with the LUA 2012 projections can be found in the 2013 Water Availability Study for the City and County of San Francisco. In the WSA, the SFPUC concluded that there are adequate water supplies to serve the Proposed Project and cumulative retail water demands during normal years, single dry years, and multiple dry years over a 20-year planning horizon from 2015 through 2035. Additionally, the Planning Department confirmed that the population growth and associated water demand of the Proposed Project was considered in the LUA 2012's projections of future water demand (see Appendix 4.13). The Proposed Project would not result in major expansion of the water supply system and SFPUC would maintain sufficient water supplies to serve the Proposed Project from existing resources.<sup>9</sup> Additionally, SFPUC would be able to accommodate the water demand of the Proposed Project with existing water treatment facilities and ongoing expansion of these facilities as planned in the WSIP.

Page 5.13-20, paragraph 2 of the Draft EIR/EIS has been revised as follows:

As described in the Water Demand and Wastewater Discharge Technical Memorandum (included as Appendix 4.13), Alternative 2 would result in an incremental decrease in water demand compared to existing conditions due to increased plumbing efficiencies required by applicable sections of the Building Code ~~the same water demand as existing conditions.~~ Alternative 2 would not result in the need to construct new water treatment facilities or expand existing facilities beyond the ongoing improvements identified in WSIP.

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<sup>9</sup> Paula Kehoe, Director of Water Resources, San Francisco Public Utilities Commission, Letter to Bill Wycko RE: Water Supply Assessment for the Proposed Potrero HOPE SF Project (July 6, 2011) (see Appendix 4.13).

## 5.16 GEOLOGY AND SOILS

The impact summary on page 5.16-12 has been revised as follows:

<b>Impact GE-5</b>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA:</b> The Proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</u></p>
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### *Alternative 1 – Reduced Development Alternative*

The impact summary on page 5.16-15 has been revised as follows:

<b>Impact GE-5</b>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA:</b> The Reduced Development Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</p> <p><b>NEPA:</b> <del>This topic is not covered under NEPA.</del> <u>The Reduced Development Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</u></p>
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## **Alternative 2 – Housing Replacement Alternative**

The impact summary on page 5.16-18 has been revised as follows:

<b>Impact GE-5</b>	<p><b>Effects on Septic Tanks</b></p> <p><b>CEQA: The Housing Replacement Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</b></p> <p><b>NEPA: <del>This topic is not covered under NEPA. The Housing Replacement Alternative would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)</del></b></p>
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## **5.17 HYDROLOGY AND WATER QUALITY**

The following text on page 5.17-6 has been revised to correctly describe Stormwater Maintenance Ordinance requirements.

### ***San Francisco Public Utilities Commission’s Stormwater Management Ordinance***

On May 22, 2010, the SFPUC enacted the Stormwater Management Ordinance to improve San Francisco’s environment by reducing stormwater runoff and runoff pollution in areas of new development and redevelopment through compliance with the *Stormwater Design Guidelines*. The *Stormwater Design Guidelines* detail the engineering, planning, and regulatory framework for designing new infrastructure in a manner that reduces or eliminates pollutants commonly found in urban runoff. ~~Compliance with the SFPUC’s Stormwater Management Ordinance requires all developments or redevelopments disturbing 5,000 square feet or more of ground surface to:~~<sup>7</sup>

- ~~■ Capture and treat the rainfall from a design storm of 0.75 inch using acceptable best management practices (BMPs)~~
- ~~■ Complete a Stormwater Control Plan (SCP) demonstrating how the project will capture and treat rainfall from the 0.75 inch design storm~~

The following text on page 5.17-13 has been revised to avoid incorrect reference to Stormwater Management Ordinance requirements.

<sup>7</sup> SFPUC. 2009. San Francisco Stormwater Design Guidelines. Available: <<http://www.sfwater.org/modules/showdocument.aspx?documentid=2779>>. Accessed: May 22, 2014.

According to the SFPUC’s Stormwater Management Ordinance, if the project disturbs greater than 5,000 square feet of land due to the demolition of housing and roads, the City is required to The Project proposes to implement BMPs (i.e., LID measures) to capture and treat rainfall. These measures will help improve drainage patterns within and around the Project site. As identified in Chapter 2, *Project Alternatives and Project Description*, and in Figure 5.17-1, the Proposed Project may include the following stormwater management strategies: These strategies are outlined in the *Design Standards and Guidelines* (Design Guidelines) document prepared for the Proposed Project.

The impact analysis on pages 5.17-15 through 5.17-16 has been revised as follows:

**Proposed Project**

<b>Impact HY-6</b>	<p><b>Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure</b></p> <p><b>CEQA: The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</b></p> <p><b><u>NEPA: This topic is not covered under NEPA. The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)</u></b></p>
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As discussed in Section 4.17, *Hydrology and Water Quality*, the Project site is not susceptible to seiche or tsunami due to its inland location (approximately 1 mile from the San Francisco Bay) and elevation of approximately 40 to 265 feet above mean sea level. The Project site is not within a dam failure inundation area, and there are no levees near the Project site. Mudflows typically occur on steep slopes where vegetation is not sufficient to prevent rapid erosion; most commonly in arid and semiarid regions. The Project site is located on the south slope of Potrero Hill, downslope from the Potrero Hill Recreation Center. The south slope of Potrero Hill is landscaped, vegetated, or developed. Therefore, mudflow would not pose a risk to the site because the physical conditions required for a mudflow are not present. Therefore, under CEQA and NEPA, *no impact* would occur.

**Alternative 1 – Reduced Development Alternative**

The impact summary on page 5.17-18 has been revised as follows:



**Impact HY-6****Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure**

**CEQA:** The Reduced Development Alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)

**NEPA:** ~~This topic is not covered under NEPA.~~ The Reduced Development Alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)

***Alternative 2 – Housing Replacement Alternative***

The impact summary on page 5.17-20 has been revised as follows:

**Impact HY-6****Effects from Seiche, Tsunami, Mudflow, Levee or Dam Failure**

**CEQA:** The Housing Replacement Alternative (Alternative 2) would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)

**NEPA:** ~~This topic is not covered under NEPA.~~ The Housing Replacement Alternative (Alternative 2) would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, or flooding as a result of the failure of a levee or dam. (No Impact)

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ATTACHMENT A **Draft EIR/EIS Letters and Emails**





## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Pacific Southwest Region  
333 Bush Street, Suite 515  
San Francisco, CA 94104

IN REPLY REFER TO  
(ER 14/0719)

*Filed Electronically*

7 January 2015

Sarah B. Jones  
Environmental Review Officer  
1650 Mission Street, Suite 40  
San Francisco, CA 94103

Subject: Draft Environmental Impact Statement (DEIS), Housing and Urban Development (HUD), **Potrero HOPE SF Master Plan Project**, Development at Sunnydale and Velasco Public Housing Developments, San Francisco, CA

Dear Ms. Jones:

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port  
Regional Environmental Officer

cc:

OEPC Staff Contact: Lisa Treichel; (202) 208- 7116; Lisa\_Treichel@ios.doi.gov

GC-1





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105

January 5, 2015

Sarah Jones  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, California 94103

Subject: Draft Environmental Impact Report/Environmental Impact Statement for the Potrero Hope Master Plan, San Francisco, California (CEQ# 20140314)

Dear Ms. Jones:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

GC-1

The Project proposes to demolish 620 public housing units and develop housing for up to 1,700 new units on the project site, located in Potrero Hill, to revitalize the distressed Potrero Housing Development and add additional affordable housing options in the City of San Francisco. The Proposed Project would include new vehicle and pedestrian connections, a new street and block layout, new transit stops, and new water, wastewater, and storm water infrastructure. In addition, the Proposed Project would incorporate green construction and sustainable principles, retail, community facilities, and open space. The Proposed Project would be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED ND) standards.

GC-1

Based on our review, we have rated the Proposed Project as *Lack of Objections (LO)* (see enclosed "Summary of Rating Definitions"). While we do not object to the Proposed Project, we have some recommendations, for your consideration, for improving the mitigation and disclosure of impacts in the Final EIR/EIS.

EPA appreciates the opportunity to review this DEIR/DEIS. When the Final EIR/EIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

GC-1

Sincerely,

FOR

Kathleen Martyn Goforth, Manager  
 Environmental Review Section

Enclosure: Summary of EPA Rating Definitions  
EPA's Detailed Comments

cc: Ernest Molins, Regional Environmental Officer, U.S. Department of Housing and Urban  
Development



## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

**Air Quality**

***Construction-phase impacts***

The DEIR/DEIS identifies significant and unavoidable air quality impacts during the construction phase due to emissions of oxides of nitrogen (NOx) above the significance threshold used in the analysis (p. 5.9-25). In addition, the analysis predicts a significant health risk impact from excess cancer risk, as evaluated in the Health Risk Assessment, as well as significant concentrations of particulate matter emissions less than 2.5 microns (PM2.5) for a resident living at the project site during the construction phase<sup>1</sup> (p. 5.9-35). However, the project proposes substantial mitigation measures to reduce these impacts and all impacts would be less than significant with mitigation except for the increases in NOx emissions, which, while remaining significant, would have negligible impacts on human health, according to the DEIR/DEIS.

AQ-1

Notwithstanding this conclusion, we recommend that the San Francisco Planning Department and HUD seek opportunities to reduce construction-phase truck emissions where possible. One possibility could be attempts to balance cut and fill volumes to reduce truck trips. Because the project site has hilly topography, grading of over 248,000 cubic yards is expected over the three construction phases, with the number of truck trips ranging from 3,550 to over 14,000 (depending on truck size). Phase 2 would require 77,810 cubic yards of fill be imported to the site, while Phase 3 would require the export of 51,250 cubic yards from the site (p. 5.7-75). It is not clear if efforts to balance cut and fill to reduce truck trips have been explored.

Additionally, the project site contains naturally-occurring asbestos. The DEIR/DEIS states that the Bay Area Air Quality Management District requires construction contractors to prepare an asbestos dust mitigation plan specifying measures that would be taken to ensure that no visible dust crosses the property boundary. The asbestos dust mitigation plan must also include an asbestos air monitoring plan if residences, businesses, hospitals, and other receptors are located within 0.25 mile of any boundary of an area to be disturbed (p. 5.18-19). Because there will be receptors on the site as well as within in the required buffer area that will require an air monitoring plan, it appears this mitigation measure needs to be modified to account for on-site residents.

AQ-1  
HZ-3

*Recommendation:* Ensure that mitigation measures M-AQ-2a and 2b, which require efficient construction equipment (including Tier 4 off-road engines after 2016), are implemented, as well mitigation measure M-AQ-4 – the preparation of a Construction Emissions Minimization Plan.

Identify whether the balancing of cut and fill volumes, such as altering the phasing of construction to reduce truck trips from soil import to and export from the site, has been explored and commit to this measure in the Final EIS if this hasn't already been considered.

<sup>1</sup>Because construction of the Proposed Project would be phased over the course of approximately 10 years, construction activities would overlap with operational activity at the Project site. (p. 5.9-17)

Include a mitigation measure to address naturally-occurring asbestos that modifies the BAAQMD requirement for a dust mitigation and monitoring plan to account for, and adequately protect, residences living on-site during construction of other phases of the project.

AQ-1, cont.  
HZ-3, cont.

***Air quality mitigation***

The project would be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) standards (p. 2-6) and the design process for the proposed project will be guided by the San Francisco Planning Code (p. 2-1) which reflects the latest smart growth policies (p. 5.10-12). The DEIR/DEIS does not specify whether photovoltaics would be incorporated into the project. It does identify the LEED credits for incorporating renewable energy into the project, and identifies the requirements for new commercial buildings to provide on-site renewable energy or purchase renewable energy credits (p. 5.10-17). Because criteria pollutants would be emitted from area sources during the operational phase as a result of natural gas combustion for heating and other uses (p. 5.10-15), incorporating photovoltaics into the project design would help mitigate impacts from criteria and greenhouse gas emissions.

AQ-3

The DEIR/DEIS does not state whether residential units would contain wood-burning fireplaces but does identify wood burning in fireplaces as a source of fine particulates (p. 4.9-4) and black carbon as a major contributor to global climate change (p. 4.10-1).

*Recommendation:* Consider incorporating photovoltaics into the project design. Consider excluding wood-burning fireplaces from the project to reduce adverse health effects caused by particulate matter pollution.

***Roadway-generated pollutants***

The DEIR/DEIS identifies the City of San Francisco’s health code provisions regarding roadway-generated pollutants (Article 38) and concludes that based on the location of the project site outside of the Air Pollutant Exposure Zone Map, the project is not required to provide enhanced ventilation for the proposed residential units (p. 5.9-6). This determination was based on the Department of Public Health’s March 2014 guidance document. The 2014 amendments to Article 38 included revisions to the underlying map of the City’s Air Pollutant Exposure Zone and it is not clear if the air quality analysis utilized the most recent Air Pollutant Exposure Zone map. See: <https://www.sfdph.org/dph/EHSDocs/AirQuality/Article38DevGuidance.pdf>.

AQ-4

*Recommendation:* Identify in the FEIR/FEIS whether the determination that the project does not need to provide enhanced ventilation still applies under the 2014 amendments to Article 38.

***Loss of Significant Trees***

The project would remove 249 significant trees, which are defined as trees above 20 feet in height, or with a canopy greater than 15 feet in diameter, or with a trunk greater than 12 inches in diameter at breast height (p. 4.15-17). While the project would replace trees according to the Urban Forestry Ordinance, which requires one street tree for every 20 feet of street frontage (p. 2-14), it is not clear whether this represents a 1:1 replacement.

BI-1  
BI-2

The landscaping on the project site would also consist of park trees, shrubs, native grasses, and lawn, and the DEIR/DEIS states that trees planted on the project site would include a mix of evergreen and deciduous, chosen to provide a variety and resiliency to disease and aid in stormwater management (p. 5.15-18). While these are important tree selection criteria, we note that President Obama issued a

federal memorandum in June 2014 entitled *Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators*<sup>2</sup> which directs Federal agencies to take steps to protect and restore domestic populations of pollinators. To help achieve this goal, CEQ issued an addendum to its sustainable landscape guidance on October 22, 2014 entitled *Supporting the Health of Honey Bees and other Pollinators*<sup>3</sup> which provides guidance to help Federal agencies incorporate pollinator friendly practices in new construction and landscaping improvements.

*Recommendations:* Clarify in the Final EIR/EIS whether the project will replace all significant trees that are removed during grading. We recommend tree replacement at a minimum ratio of 1:1 and that the responsible party for tree maintenance be specified.

BI-1, cont.  
BI-2, cont.

We recommend that the landscape plan include pollinator-friendly plant species and that the project incorporate pollinator-friendly practices into site landscape performance requirements, particularly regarding the use of pesticides, and ensure all maintenance personnel are made aware of these practices.

**Environmental Justice**

The project site is considered to be extremely low income and is considered an environmental justice community on the basis of both income and ethnicity (p. 4.5-3). The DEIR/DEIS states that input from the community was sought in over 30 workshops, presentations, and project tours which were conducted in English since approximately 76% of the population on the project site are fluent in English (p. 4.5-4). However, the DEIR/DEIS does not specify how project information was communicated to the almost one quarter of the population that was not fluent in English. Executive Order 12898 requires federal agencies to work to ensure effective public participation and access to information.

OC-2

*Recommendation:* In the Final EIR/EIS, identify whether any public outreach efforts occurred for non-English speakers. Consider conducting language-specific outreach prior to the distribution of the Final EIR/EIS if outreach for non-English speakers has not yet occurred.

**Scope of NEPA Evaluation**

The DEIR/DEIS states in a number of resource evaluation chapters that certain impact assessments are not covered under NEPA and are evaluated under the California Environmental Quality Act (CEQA) only. For example, the evaluation of the effects of hazardous materials on schools includes this statement. We believe the scope of NEPA analysis is broader than the document suggests. For example, NEPA documents commonly evaluate a project’s effects on children pursuant to *Executive Order 13045 - Protection of Children from Environmental Health Risks and Safety Risks*. The DEIR/DEIS also states that effects on stormwater capacity are not covered under NEPA, without explanation, nor are effects on septic tanks, which clearly could have a water quality impact. Additionally, the DEIR/DEIS states that evaluation of effects on paleontological resources are not covered under NEPA. While NEPA does not provide specific guidance regarding paleontological resources, the NEPA requirement that federal agencies take all practicable measures to “preserve important historic, cultural, and natural aspects of our national heritage” (NEPA § 101[b][4]) is commonly interpreted as applying to paleontological materials.

OC-3

<sup>2</sup> See <http://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promote-health-honey-b>

<sup>3</sup> See [http://www.whitehouse.gov/sites/default/files/docs/supporting\\_the\\_health\\_of\\_honey\\_bees\\_and\\_other\\_pollinators.pdf](http://www.whitehouse.gov/sites/default/files/docs/supporting_the_health_of_honey_bees_and_other_pollinators.pdf)

*Recommendation:* We recommend revisiting the rationale for determining whether impact assessments are covered under NEPA. When the document concludes that an evaluation is not covered under NEPA, provide a more thorough explanation.

OC-3, cont.



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4  
 P.O. BOX 23660  
 OAKLAND, CA 94623-0660  
 PHONE (510) 286-6053  
 FAX (510) 286-5559  
 TTY 711  
 www.dot.ca.gov

**RECEIVED**

JAN 12 2015

CITY & COUNTY OF S.F.  
 PLANNING DEPARTMENT  
 M E A



Serious Drought.  
 Help save water!

January 6, 2015

SF280142  
 SF-280/101-VAR  
 SCH# 2010112029

Ms. Rachel Schuett  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

Dear Ms. Schuett:

**Potrero HOPE SF Master Plan Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS)**

Thank you for including the California Department of Transportation (Caltrans) in the review of the EIR/EIS for the project referenced above. We have reviewed the document and have the following comments.

GC-1

1. Caltrans encourages the City and County of San Francisco to locate any needed housing, jobs and neighborhood services near major transit facilities, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways. We also encourage Travel Demand Management (TDM) policies to encourage usage of nearby public transit lines and reduce vehicle trips on the State Highway System. These policies could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others.
2. Page S-20, Executive Summary Table S-1, Impact TR-2(b): Effects on Freeway Segments – CEQA: The subjects should be The Housing Replacement Alternative and the No Project Alternative, not the Proposed Project and the Reduced Development Alternative. Please clarify.
3. Page 4.7-1, Introduction: The Transportation Impact Study (TIS) referenced (October 2012) in the plan needs to be updated. A TIS requires updating every two years. Please update the TIS to the latest Highway Capacity Manual (HCM 2010) and discuss changes.
4. Section 4.7.2 Existing Conditions: Has the intersection of Pennsylvania Ave and 25<sup>th</sup> St been analyzed? What is the control delay of this intersection? Southbound Route 280

TR-4

GC-6

TR-1

TR-2



Ms. Rachel Schuett  
January 6, 2015  
Page 2

- |   |                    |
|---|--------------------|
| <p>Pennsylvania Ave off-ramp and on-ramp currently have a weekday peak-hour demand of about 620 vehicles per hour (peak hour 3-4 PM) and 1028 vehicles per hour (peak hour 4-5 PM), respectively. Will this project create a significant impact and cause the traffic to back up from this intersection to the southbound I-280 mainline?</p>   | <p>TR-2, cont.</p> |
| <p>5. Table 4.7-2: Freeway volumes (#1 and #3, northbound I-280, PM Peak) seem to be low compared to the PEMS data. Please verify.</p>  |                    |
| <p>6. How were the 2030 cumulative freeway/ramps/ramp junctions volumes generated (see TIS Tables 4-9, 4-10, 4-11) and what assumptions were used? Similarly, please explain how the volumes (additional trips) were generated for the proposed project and alternatives (i.e., project contribution).</p>  | <p>TR-1</p>        |
| <p>7. Page 5.7-101 to 5.7-104, C-M-TR-1a, -1b, -1c, and -1d: Please address fair share contribution when proposed mitigation measures are identified on State right of way. As the lead agency, the City and County of San Francisco is responsible for all project mitigation, including any needed improvements to the State Highway System. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.</p>   | <p>TR-9</p>        |
| <p>8. Page 5.7-102, C-M-TR-1b: Will the lane width be able to accommodate the additional left turn pocket without impacting the opposing traffic at this intersection? Discussion of traffic signal is missing.</p>   | <p>TR-9</p>        |
| <p>9. Please utilize the future traffic volumes and conduct a traffic signal warrant analysis, per Section 4C.01(11) of the California Manual on Uniform Traffic Control Devices, to ensure that at least one signal warrant is satisfied for each of the following intersections:<br/>         Intersection #3 (Pennsylvania Avenue/Southbound Route 280 Off-Ramp)<br/>         Intersection #4 (25<sup>th</sup> Street/Indiana Street/Northbound Route 280 On-Ramp)<br/>         Intersection #13 (Cesar Chavez Street/Route 101 Off-Ramp)</p>  | <p>TR-10</p>       |
| <p>10. TIS, Appendix 4.7, Figures 3-1 and 3-2: How was the project trip distribution generated?</p>   | <p>TR-1</p>        |
| <p>11. The report only shows PM turning movement traffic per study intersection under Existing, Growth Only, Project Only, 2030, and 2030 Cumulative + Project Conditions. Traffic patterns for AM peak should also be analyzed under CEQA. AM peak traffic is a worse scenario in the opposite directions compared to PM peak traffic. Therefore, under Existing, Growth Only, Project Only, 2030, 2030 Cumulative+ Project Conditions, we recommend the report include an AM (PM) trip generation table and AM (PM) turning movement traffic per study intersection, which covers near-by on-/off-ramps of US101 and I-280.</p> | <p>TR-10</p>       |



Ms. Rachel Schuett  
January 6, 2015  
Page 3

Should you have any questions on this letter, please contact Sergio Ruiz at (510) 622-5773 or [sergio.ruiz@dot.ca.gov](mailto:sergio.ruiz@dot.ca.gov).

GC-1

Sincerely,



PATRICIA MAURICE  
Acting District Branch Chief  
Local Development – Intergovernmental Review

c: State Clearinghouse





Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

January 8, 2015

Rachel Schuett  
City and County of San Francisco  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

Subject: Potrero HOPE SF Master Plan  
SCH#: 2010112029

Dear Rachel Schuett:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 7, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

GC-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2010112029  
**Project Title** Potrero HOPE SF Master Plan  
**Lead Agency** San Francisco, City and County of

**Type** EIR Draft EIR  
**Description** Note: Extended Review

The Proposed Project would demolish 620 public housing units and develop up to 1,700 new housing units for a range of income levels on the Project site (APN 4167-004A, 4167-004, 4220A-001, 4222A, 4285B, 4223/001) located in Potrero Hill at the housing developments Potrero Terrace and Potrero Annex. A portion of the Project site, Block X, would need a zoning amendment from P to RM-2. The existing height and bulk designation of the Project site would need to be amended through a Height and Map Amendment. The purpose of the Proposed Project is to revitalize the distressed Potrero Housing Development as part of the HOPE SF program and add additional affordable housing options to the City of San Francisco. Schools within two miles of the Project site include: Starr King ES, Daniel Webster ES, and International Studies Academy.

**Lead Agency Contact**

**Name** Rachel Schuett  
**Agency** City and County of San Francisco  
**Phone** 415 575 9030 **Fax** (415) 558-6409  
**email** Nannie.Turrell@sfgov.org  
**Address** 1650 Mission Street, Suite 400  
**City** San Francisco **State** CA **Zip** 94103-2479

**Project Location**

**County** San Francisco  
**City** San Francisco  
**Region**  
**Lat / Long** 37° 45' 20" N / 122° 23' 42" W  
**Cross Streets** 25th Street and Wisconsin Street, Texas Street and 25th Street  
**Parcel No.**  
**Township** 2S **Range** 5W **Section** 15 **Base**

**Proximity to:**

**Highways** I-280, I-80, U.S. 101  
**Airports**  
**Railways** 22nd St Caltrain Station  
**Waterways** Islais Creek  
**Schools**  
**Land Use** RM-2 - Residential - Mixed, Moderate Density, P-Public

**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Forest Land/Fire Hazard; Economics/Jobs; Fiscal Impacts; Septic System; Other Issues

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 4; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Document Details Report  
State Clearinghouse Data Base

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*Date Received* 11/03/2014      *Start of Review* 11/03/2014      *End of Review* 01/07/2015





BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

January 7, 2015

Sarah Jones  
Environmental Review Officer  
San Francisco Planning Department  
City and County of San Francisco  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Subject: Potrero HOPE SF Master Plan Project DEIS/DEIR

- ALAMEDA COUNTY  
Tom Bates  
Margaret Fujioka  
Scott Haggerty  
Nate Miley
- CONTRA COSTA COUNTY  
John Gioia  
David Hudson  
Mary Piepho  
Mark Ross
- MARIN COUNTY  
Katie Rice
- NAPA COUNTY  
Brad Wagenknecht
- SAN FRANCISCO COUNTY  
John Avalos  
Edwin M. Lee  
Eric Mar  
(Vice-Chair)
- SAN MATEO COUNTY  
David J. Canepa  
Carole Groom  
(Chair)
- SANTA CLARA COUNTY  
Cindy Chavez  
Liz Kniss  
(Secretary)  
Jan Pepper  
Rod G. Sinks
- SOLANO COUNTY  
James Spering
- SONOMA COUNTY  
Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Dear Ms. Jones,

Bay Area Air Quality Management District (Air District) staff has reviewed your agency's Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIR) prepared for the Potrero HOPE SF Master Plan Project (Project). The Project is located in the southeastern area of the Potrero Hill neighborhood bounded by Interstate 280 on the west, U.S. Highway 101 on the east, and Cesar Chavez Street to the north. The Project site comprises several parcels totaling approximately 39 acres.

The Project would replace current uses with approximately 1,700 residential units, up to 15,000 square feet of ground-floor, neighborhood-serving retail or flex space, a community center, public and private open space, a daycare and preschool facilities. Approximately 600 of the residential units would be affordable housing and the remaining 1,080 units would include a mix of affordable and market rate housing.

Air District staff has the following comments on the DEIR:

The DEIR concludes that there is a significant and unavoidable impact due to nitrogen oxides (NOx) emissions during the construction phase, which is estimated to last ten years. To mitigate this impact, the DEIR identifies a number of measures to reduce construction emissions. However, there are additional measures that are feasible and would further reduce this project's significant NOx impacts. Therefore, the Air District recommends that the City consider requiring the following additional measures as part of Mitigation Measures AQ-2a, 2b, and 4:

- Require that all on-road trucks that haul materials to and from the construction site meet 2010 on-road engine standards.
- Require that all off-road construction equipment meet Tier 4 Interim standards by 2015. Tier 4 Interim engines have been available since 2011 and therefore should be deployed for this Project from the beginning of construction activities. This would reduce NOx emissions from all equipment, particularly from the larger engines needed for demolition that

GC-1

AQ-1

Ms. Jones

January 7, 2015

- produce more emissions during use, as compared to equipment with smaller engines.
- Require any diesel back-up generators, used when grid energy is not available on the construction site, meet Tier 4 Interim standards.

AQ-1, cont.

It should also be noted that there will be sensitive receptors (children and the elderly) living within the construction site during demolition and construction activities. The diesel particulate matter (DPM) emissions (classified as a toxic air contaminant by the California Air Resources Board) from demolition and construction activities can have acute and chronic adverse health impacts on these sensitive receptors. The mitigation measures recommended above will also serve to reduce DPM emissions, and therefore reduce the health risk to these sensitive receptors.

AQ-2

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

GC-1

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Vice Chair Eric Mar  
BAAQMD Director John Avalos  
BAAQMD Director Edwin M. Lee





# San Francisco Water

Services of the San Francisco Public Utilities Commission

## Bureau of Environmental Management

525 Golden Gate Avenue, 6th Floor

San Francisco, CA 94102

T 415.934.5700

F 415.934.5750

**DATE:** January 6, 2015

**TO:** Rachel Schuett, Planner, San Francisco Planning Department

**FROM:** Irina P. Torrey, AICP, Bureau Manager,  
SFPUC Bureau of Environmental Management

**SUBJECT:** SFPUC Comments on the Draft EIR/EIS for the Potrero HOPE SF  
Master Plan

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report/Environmental Impact Statement for the Potrero HOPE SF Master Plan Project. Staff of the San Francisco Public Utilities Commission (SFPUC) offer the following comments.

GC-1

### General Comments

The SFPUC holds several water and sewer easements within the project area, and existing water main alignments are under proposed buildings. If the project area is reconfigured as proposed in the draft EIR, the SFPUC strongly prefers to have its utilities located within the public right of way rather than within easements. Any vacation of existing easements must be executed in accordance with City of San Francisco (City) and SFPUC standards.

PD-5

Any work within existing SFPUC easements requires SFPUC review and approval by the SFPUC Real Estate Services Division and Wastewater Enterprise.

### Chapter 2 Comments

Page 2-14, Paragraph 2

This section discusses landscaping, including planting of trees as part of the project. Please be advised that the SFPUC General Manager Order for Surface Improvement Projects states that trees are not allowed above or within five feet of the outside diameter of wastewater assets or lateral vents.

PD-5

Page 2-15, Paragraph 3

This section describes potential for widening of sidewalks. Please be advised that the SFPUC General Manager Order for Surface Improvement Projects includes the following requirements concerning sidewalks:



- 1) Proposed curbs and gutters are not allowed within three horizontal feet of the outside diameter of existing parallel linear wastewater assets such as pipes.
- 2) Proposed curbs and gutters are allowed to cross subsurface wastewater assets.
- 3) Proposed curbs and gutters are not allowed within three horizontal feet of any existing manhole structures.

Also, should proposed sidewalk widening and/or bulbout be located above sewer laterals, the following would apply:

- 1) The project sponsor shall relocate the sewer lateral air vent and trap to conform with San Francisco Department of Public Works standard plan 87,196 and replace the upper lateral from the vent to the property.
- 2) The project sponsor shall notify all adjacent property owner(s) of their increased responsibility for the sewer lateral(s). The project sponsor shall send a copy of the notification to SFPUC Wastewater Enterprise, Collection Systems Division (WWE/CSD).

PD-5, cont.

Page 2-16, Paragraph 4

If the project proposes to reuse existing sewer laterals, they must be checked for capacity and condition. The laterals shall be televised by the project sponsor. Resultant television inspection videos shall be reviewed and approved by SFPUC WWE/CSD. Reuse or replacement of laterals shall be at sole discretion of SFPUC WWE/CSD.

UT-3

Proposals for new public sewer infrastructure (lower laterals, catch basins, culverts, mains, manholes, etc.) shall be submitted for review and approval by SFPUC WWE/CSD. All sewer infrastructure shall comply with applicable City standards. Please contact SFPUC WWE/CSD at sewerinspections@sfgwater.org for review.

**Chapter 3 Comments**

3-11, Paragraph 3

The San Francisco Green Building Ordinance (SFGBO) does not require compliance with the Stormwater Design Guidelines (SDG). The Stormwater Management Ordinance (SMO) requires compliance with the Stormwater Design Guidelines. Remove language stating SDG is a requirement of the SFGBO throughout the document. Include SMO requirements in the SMO section.

UT-2

3-12, Paragraph 1

Please remove description of LEED SS6.2. Stormwater treatment (LEED SS6.2) is only required for projects in a separate sewer area per the SMO. The proposed project would be served by the combined sewer system and the applicable SDG require that the project to manage stormwater for peak rate and total volume (e.g. LEED 6.1).

UT-2

**Chapter 4 Comments**

Page 4.13-1, Paragraph 3

Some of the numbers from the Urban Water Management Plan (UWMP) are outdated and will be updated in the 2015 UWMP. Some of the updated numbers are already reflected in SFPUC's communications and reports. Instead of 2.5 million customers, the SFPUC currently serves 2.6 million. Instead of 280 miles of pipelines and 60 miles of tunnels in the Regional Water System, the SFPUC currently operates 390 and 74 miles, respectively. Instead of 17 pump stations in the City, there are currently 22. Instead of 12 reservoirs in the City, there are currently 11. Instead of 1,250 miles of pipelines in the City, there are currently 1,235. Instead of nine storage tanks in the City, there are currently eight.

Page 4.13-3, Table 4.13-1

It is recommended that water demand projections in Table 4.13-1 be based on the SFPUC's latest projections, which are documented in the 2013 Water Availability Study and supersede the projections in the 2010 UWMP. The Water Supply Assessment that SFPUC prepared for the project takes into account the projections in the 2013 Water Availability Study.

UT-1

4.13-3, Table 4.13-2

It is recommended that water supply projections in Table 4.13-2 be based on the SFPUC's latest projections, which are documented in the 2013 Water Availability Study and supersede the projections in the 2010 UWMP. The Water Supply Assessment that SFPUC prepared for the project takes into account the projections in the 2013 Water Availability Study.

Pages 4.13-1 to 4.13-5, Project Water Distribution System

The project sponsor is required to design the project's water distribution system to conform to the SFPUC design standards for new water mains, services, and fire hydrants.

SFPUC suggests that prior to the beginning the design of the project water distribution system that the project sponsor meet with the Engineering staff from the SFPUC City Distribution Division (CDD) to discuss and obtain copies of SFPUC design standards. In addition, the project sponsor will need to submit the 65% and 95% design drawings to CDD staff for review and approval.

UT-6

The project sponsor will also need to pay for SFPUC CDD design services for the review of design submittals, as well as CDD construction services for the inspection of the project's water distribution system.

The project sponsor will need to conduct a hydraulic analysis of the project to determine if the existing SFPUC water distribution system is sufficient to meet the project's potable and fire suppression demands. It is the responsibility of the project sponsor to pay for the hydraulic analysis. If it is determined that existing SFPUC water distribution system would not meet the project's demands, then it will be the project sponsor's responsibility to pay for the design and construction of required

upgrades to SFPUC water facilities. Alternatively, the project sponsor can pay SFPUC CDD for design and construction services. In addition, the SFPUC will perform all required disinfection and connections of new mains and services; the project sponsor is required to pay for these services.

UT-6, cont.

**Chapter 5 Comments**

Page 5.10-16, Table 5.10-2

The SFGBO does not require compliance with the Stormwater Design Guidelines. The Stormwater Management Ordinance requires compliance with the SDG. Please remove SDG as a requirement of the SFGBO throughout the document.

UT-2

Page 5.13-13, Paragraph 1

Please ensure that your project specifications require adherence to relevant testing standards for all new sewer-related infrastructure (e.g. ASTM C828).

Any new public sewer infrastructure (lower laterals, catch basins, culverts, mains, manholes, etc.) to be developed shall be submitted for review and approval by SFPUC-WWE/CSD. All sewer infrastructure shall comply with applicable City standards. Please contact SFPUC-WWE/CSD at sewerinspections@sflower.org for review.

PD-5

Existing water mains will be required to be relocated and realigned based on proposed layout to ensure that water facilities are located within the public right of way. There are existing water main alignments located under proposed buildings.

Page 5.17-6, Paragraph 3-4

SMO requirements are referenced incorrectly. Please remove the sentence including two bullets describing "treatment" requirements as those are for separate sewer areas only.

UT-2

Page 5.13-1, Paragraph 3

Regarding the first sentence, "According to the 2010 San Francisco Urban Water Management Plan (UWMP), [...] nearly 2.5 million people rely on water supplied by the SFPUC water system...", the SFPUC currently identifies 2.6 million.

Page 5.13-3, Paragraph 1

Please note that the deadline for submittal of the 2015 UWMP to the California Department of Water Resources has been postponed from December 31, 2015 to July 1, 2016.

UT-1

Page 5.13-3, Paragraph 2

The subsection heading includes "Senate Bill 221," but there is no description of SB 221 in the paragraph.

Page 5.13-13, Paragraph 3

Although the project is not located within the CCSF's Recycled Water Ordinance Area, the SFPUC would like to have a better understanding of the proposed project's

UT-5

water uses and associated demands. The SFPUC is interested in evaluating the potential to provide recycled water to the area.

UT-5, cont.

Page 5.13-14, Paragraph 1

Regarding the sentence: "Therefore, the Proposed Project is required to prepare a WSA that documents the SFPUC's current and projected water supplies when compared to demands associated with the LUA 2012 projections." it can also be noted that the water demands associated with the LUA 2012 projections are provided in the 2013 Water Availability Study that was prepared by the SFPUC in May 2013 and available at: <http://sfwater.org/modules/showdocument.aspx?documentid=4168>.

UT-1

Regarding footnote 9, it is not correct to associate the letter from Paula Kehoe to Bill Wycko (dated July 6, 2011) with the sentence that describes the Planning Department's confirmation of population growth in the LUA 2012. Footnote 9 would be better associated with the next sentence that begins with: "The Proposed Project would not result in major expansion of the water supply system..." Or, the more appropriate letter to reference is that from Scott Edmonson to SF Planning EP Planners and SFPUC Planners dated June 13, 2013. Scott Edmonson's letter can still be found in Appendix 4.13 (see Attachment B of the Water Supply Assessment).

Page 5.13-20, Paragraph 2

Regarding the sentence, "Alternative 2 would result the same water demand as existing conditions", it appears that Alternative 2 would likely result in less water demand due to increased plumbing efficiencies with new construction.

AL-2

Page 5.17-9, Paragraph 3

Section 5.9 (Air Quality), page 5.9-25, paragraph 5 indicates that non-potable water would be used for dust control during construction. Article 21, Section 1100 et seq. of the San Francisco Public Works Code (also known as CCSF Ordinance 175-91) states that non-potable water must be used for dust control activities and soil compaction. Soil compaction is mentioned in Section 5.16 (Geology and Soils) and Section 5.17 (Hydrology and Water Quality), and must comply with CCSF Ordinance 175-91. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge. For more information please contact (415) 695-7358.

UT-4

Page 5-17-10, Paragraph 2

If wells would be used for groundwater dewatering, the use of wells would need to comply with San Francisco's Soil Boring and Well Regulation Ordinance, adopted as Article 12B of the San Francisco Health Code. The use of a groundwater well may affect the beneficial uses of San Francisco's aquifers, and shall be reviewed and approved by the San Francisco Department of Public Health and the SFPUC.

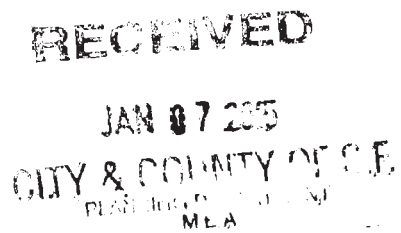
UT-7



Lee Abel  
1212 Wisconsin St.  
San Francisco, CA 94107  
(415) 821-2271 [leeabel@mindspring.com](mailto:leeabel@mindspring.com)

January 4, 2015

Sarah Jones  
Environmental Review Officer  
SF Planning Dept.  
1650 Mission St., Suite 400  
San Francisco, CA 94103



Re: Draft EIR/EIS comments  
Potrero HOPE SF Master Plan

Thank you for allowing me to comment on the Draft EIR/EIS for Potrero HOPE project. I live in the bordering block most affected by the rebuilt, on Wisconsin St. between 25<sup>th</sup> and 26<sup>th</sup>. It is most affected because not only does it border the project, but it has the largest amount of through traffic, including buses. We already deal with noise, congestion, pollution, and, of course, a tremendous amount of car break-ins.

GC-1

First, let me say that I am in favor of the current buildings being torn down and replaced by mixed economic housing. I do believe this will cut down on car break-ins on my street. But the way the plan currently reads, it is clear that my other concerns (noise, congestion, pollution) will have a marked increase, and not only just during the 10 year rebuild.

GC-1

I do not think it fair that my block will lose its view and be saddled with a 40 foot wall of buildings (whose occupants will then have our view), a massive increase in cars and buses on my street, which will create a canyon of noise and pollution at our doorstep, without any recompense to us at all. This hardly seems fair.

AE-4  
AQ-3  
NO-2  
TR-3

Why can't the buildings across the street on Wisconsin, between 25/26, step down the hill in such a manner that they start at curbside as low buildings? Why would the planners not even grant us that consideration?

PD-1

Why can't the planners address the issue of increased bus traffic on this one block? As it is today, two buses cannot even pass each other on this block. I understand the block will be widened, but then you plan to add perpendicular parking and more buses to handle the increase in population. The street would need to be widened significantly in order to handle this massive increase in flow.

TR-3

Speaking of increase, the plans call for up to 1700 units, and the units look to be built very dense with interior courtyards and very little outside space. The mature trees currently helping process the pollution will be ripped out. I share with my

BI-1  
PD-1



neighbors their concerns that the build is way too dense for Potrero Hill, that there is not enough open space, and that trees should be preserved whenever possible.

BI-1, cont.  
PD-1, cont.

I also share the concern that middle income families should have access to this housing. It seems as though it will primarily benefit those without any resources and those who can afford market rate. We had hoped it would be more integrated.

SE-3

Another concern is the asbestos in the rock. I want to know exactly what safety measures will be taken, and what % of asbestos is in various rock samples, since we will have to live with a decade of toxic substances being released in to the air - not to mention a decade of dust, noise, and congestion - during the rebuild. Our neighborhood already deals with very high rates of asthma and cancer. This asbestos issue MUST be addressed and not swept under the rug in any manner. What will be offered to the neighbors that border the rebuild as the toxic materials sweep over us?

HZ-2

I am also concerned about the lack of open space in the plan, yet see how they mention the Starr King Open Space as bordering on the project. In reading between the lines, it seems they expect the current open space to support a massive influx of people. This is all good and fine as a marketing device to get market rate folks to buy or rent, but the Starr King Open Space does not get government funding and is in desperate need of money to repay for the sidewalks being fixed. Might the City or the builders consider donating to the SKOS so that it can remain a community space? As I understand it, if the Board does not come up with the money to repay the city for fixing the sidewalks that border it, the city could take back the open space, could even build on it. We NEED our open space and we need funding help so that it is accessible to all who currently live on the Hill, as well as to all those who will be moving in soon. I can provide you with more information on this.

PD-4  
RE-1

What is the compensation for living with this massive rebuild, losing my view, and then living with close to a 3 fold increase in density, buildings, cars, buses, noise, etc? Keep in mind that not all the units are occupied right now, so the difference between the number of units occupied at present and the number that will be occupied when the project is complete is more than 3 fold.

GC-1

One bright point, not specifically outlined in the report but told to me as a strong possibility, is that the first tear down/build up section will be right across the street from my house, on Wisconsin between 25<sup>th</sup> and 26<sup>th</sup>, and that it will be market rate housing. I applaud this for several reasons. First, if they build new housing at the old basketball court and then move current residents from the units closest to Wisconsin and 25/26, that will solve the initial problem of relocation and they won't have to move again. Then, by building the first large section on Wisconsin 25/26, it will provide a sound and dust barrier to all the work that follow for many years on the rest of the project. Also, there will be a cash inflow with the market rate housing section being done so early on the project. It is a win, win, win situation.

GC-3





**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Tuesday, January 06, 2015 8:51 AM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Potrero Hope Master Plan for Potrero Annex, Potrero Terrace, Public Housing

---

**Sarah Bernstein Jones**  
**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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** vanessa aquino [<mailto:vanessa.r.aquino@gmail.com>]  
**Sent:** Monday, January 05, 2015 8:23 PM  
**To:** Jones, Sarah (CPC)  
**Subject:** Potrero Hope Master Plan for Potrero Annex, Potrero Terrace, Public Housing

Hello Sarah Jones,

As a native San Franciscan and living in Dogpatch Neighborhood for over 11 years, would like to know if this project, "*Potrero Hope Master Plan for Potrero Annex, Potrero Terrace, and Public Housing*" will help those that live in the Public Housing now? Will they help the tenants there now get temporary homes while the project begins? Or are they being displaced? Will this project support low and middle class working San Franciscans an opportunity back into the neighborhood? It is very very important to make these homes more affordable for those that clean our homes and take care of our children and many other services.

SE-2  
SE-3

In addition, I would like to receive updates on how noise, air quality and transportation will be handled. Important factor is 22nd Street corridor tends to be heavy with cars, trucks and other commercial vehicles that tend to speed. Perhaps adding signs to help reduce speed would be helpful. More and more traffic continues to grow each day with new condos open; less than one month away for the opening of UCSF Children's and Women's Hospital that we, our community are feeling the impact. Safety is critical as our neighbors have families and more are coming.

TR-8

Thank you for your time.

~vanessa r. aquino  
Dogpatch Neighborhood Membership Coordinator  
Blogger | Photographer  
415-503-8927  
[www.movingroovin.com](http://www.movingroovin.com)  
Twitter | [@sfmovingroovin](https://twitter.com/sfmovingroovin)  
My Community: [www.mydogpatch.org](http://www.mydogpatch.org)  
My Community Twitter | [@DogpatchStFest](https://twitter.com/DogpatchStFest)



January 7, 2015

Sarah Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Suite 400  
San Francisco, CA. 94103

Dear Planning Commissioners:

My name is Niesha Brown; I am a resident in the Potrero Hill Terrace housing developments. I want to support the Rebuild Potrero project, under certain conditions. Even though I do not agree on some things about the development and the process, my heart says, **“Change is good.”** The living conditions for some families in the community are upsetting for me to see, the new development will bring joy and happiness and a positive outcome to all in the community, not just for the individuals in the Projects, but for homeowners as well.

GC-1

GC-1

I have lived at PTA for more than 30 years, it has been difficult to move through the neighborhood due to steep hills, less parking for residents in the community, and by eliminating, the parking is going to be out of control, as well of rebuilding Potrero for over 20 years. Ex: A few years ago, SFHA established a rule for all residents stating if you owned vehicles and parked in the parking stall, you would need a permit sticker; otherwise, vehicles were going to be towed. Assigning and creating residents parking stalls would eliminate many vehicles on the streets and less vandalism. Also most important to me difficulty getting around the development but the new design would make it easier to mobilize up these steep streets especially helping the seniors

TR-6

TR-7

I honestly feel the need for change and supporting the process, only if the containment of dust and chemical will be handle properly while some tenants decide to stay on the premises. Growing up in low-income housing had a lot of disadvantages, challenges, and barriers to

AQ-1

HZ-1

overcome I have made it, but most have not. I support only if the constructors will properly contain the dust and chemicals while residents are on site.

AQ-1, cont.  
HZ-1, cont.

**Schuett, Rachel (CPC)**

---

**From:** Reynolds Cameron <reynolds.cameron@gmail.com>  
**Sent:** Wednesday, January 07, 2015 5:00 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Potrero Hill HopeSF public comment (case no: 2010.0515E)

Members of the San Francisco Planning Commission (and the SF Political Establishment):

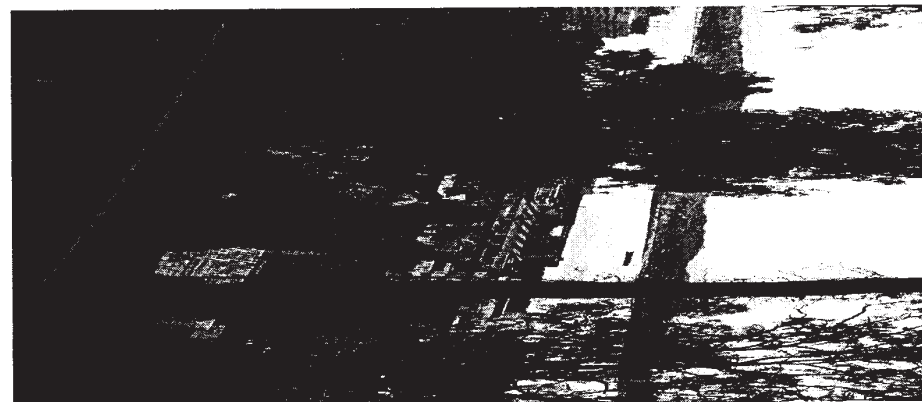
I write to express strong opposition against the currently proposed BRIDGE Housing concept for Potrero Hill. There are several bases for my objection, which include:

- Blocking the public vista from the Potrero Hill Recreation Center (PHRC)
- Providing inadequate public benefit
- Providing insufficient housing density
- Auto-centric streetscape
- Misappropriation of the public purse
- Wasted opportunity to build a transformative project that would improve San Francisco for generations

AE-3  
PD-1

**Blocking Significant Public Vistas**

The EIR clearly demonstrates that the vast southern views from PHRC will be obstructed by the proposed development, in strict violation of the SF General Plan. Equally valuable view sheds to the east of the SF Bay and Oakland/Fremont hills will all be obstructed, yet BRIDGE Housing completely ignores this fact. Example views from the PHRC playground and dog park include these:



AE-1  
AE-3



AE-3,  
cont.

**Inadequate Public Benefit:**

While the proposed project does include nominal public space and a few retail units, it fails by modern design standards to address the needs of this project. In light of the recently-publicized "DropBox soccer bros in the Mission" YouTube incident, it is evidently clear that the east side of The City is in dire need of more soccer fields. A rather simple solution would be to build a grade-level rooftop soccer field along 23rd Street, with residential and commercial units below. Several examples of both soccer fields on rooftops, as well as smart use of public space have been demonstrated around the world. Given the degree to which this project is subsidized by the public taxpayer, we should expect a public benefit out of it. For more info on this subject, please look to architects like Bjarke Ingels (BIG), and many others.

PD-4

**Insufficient Housing:**

The purported reason for why the public must sacrifice so much free land, money and public views over to this private developer is because they are providing below-market housing. The number of units they have

PD-1

proposed here is a drop in the bucket. The unit density could double, while simultaneously increasing the amount of green open space and reducing auto trips, if only smart design were deployed.

PD-1,  
cont.

**Auto-Centric Streetscape:**

The authors allege that the cause of crime in the neighborhood is because of winding streets. This is the most asinine argument I have heard in decades. South Central Los Angeles has square street grids. If anything, it promotes crime there. Meanwhile, Sausalito and Stockholm have winding street patterns, yet much lower crime rates.

TR-7

**Misappropriation of the Public Purse:**

\$1 billion in subsidies, plus a free 39 acres parcel of land worth \$300 million to build 1200 subsidized housing units is more than \$1 million per unit. Enough said. For more detailed argument, please see my blog.

GC-3

**Wasted Opportunity:**

The unique topography and vistas of this property make it a site worthy of a design competition. I strongly urge the City and County of San Francisco to send HopeSF back to the drawing board and foster a global design competition.

GC-1

Sincerely,  
Reynolds Cameron





**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Monday, December 29, 2014 7:42 AM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Fw: Rebuild Potrero

---

From: Matt <[mattcostamagna@yahoo.com](mailto:mattcostamagna@yahoo.com)>  
Sent: Sunday, December 28, 2014 11:59 AM  
To: Jones, Sarah (CPC); Cohen, Malia (BOS)  
Subject: Rebuild Potrero

I am a homeowner and resident of Potrero Hill. I can actually see the public housing from my window. I wholeheartedly support the rebuilding. It cannot happen fast enough. This will unify and improve our neighborhood. There is a small, vocal group of opponents who do not represent what most of the residents of the area want. Please continue to push for the redevelopment.

GC-1

Thanks,  
Matt Costamagna  
Resident on 20th street

Sent from my iPhone



Jennifer Dhillon

6347 Longcroft Dr. Oakland, CA 94611

January 6, 2015

Sarah Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, California 94103

Re: Rebuild Potrero EIR

Dear Ms. Jones:

I am a nonprofit consultant and work at the Potero Annex and Terraces (PTA) where I created a program called Healthy Generations Project (HGP). HGP works with children and families at PTA to help manage the negative effects of toxic stress on children who are growing up in the neighborhood in poverty and an atmosphere of high crime and violence. The impacts of stress on children in these circumstances has been the focus of a growing field of research that links toxic stress to long term negative health impacts to children’s cognitive, emotional and physical health.

GC-1

I strongly support the Rebuild Potrero Plan. Currently, the dilapidated apartments and the unsafe pedestrian environment create conditions that are detrimental to children’s health.

GC-1

The lack of mixed income, and mixed use in the area means the PTA residents live in a food desert and lack access to simple amenities such as laundromats, gathering places, and safe places to play. The new street grid will also create a more walkable environment to counter the extreme hills and dark and covered walking pathways.

TR-7

I urge the Planning Commission to consider that higher density will improve the social atmosphere because it will increase populations (thus increasing amenities) and as the plan shows, will create open space and active social areas. As a student of Crime Prevention Through Environmental Design (CPTED) I believe the increase and mix of populations within the design structure will help to reduce criminal activity.

PD-1

Please approve this project. It is necessary and long overdue for the residents of this forgotten portion of Potrero Hill.

GC-1

Sincerely,

  
Jennifer Dhillon



Sarah Jones  
Environmental Review Officer - Potrero Hill Master Plan EIR  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

December 3, 2014

**RE: Rebuild Potrero – Comments relating to the DEIR/DEIS**

Dear Ms. Jones,

The undersigned represent a group of homeowners in and around the Parkview Heights development on Potrero Hill. As residents in an area that will be significantly impacted from the proposed Rebuild Potrero development, we share a desire for its positive effect on our community and long-term success. We appreciate this opportunity to share our concerns and comments about the project, which are summarized below:

GC-1

**DIVERSITY OF INCOME LEVELS AND OWNERSHIP THROUGHOUT THE DEVELOPMENT**

We understand the pride and opportunities inherent with home ownership and the benefits ownership has on families and entire communities.

- A. We strongly believe that for the development to become a thriving environment for families of all kinds, each area of the development should offer a mix of affordable housing and ownership opportunities so that people of all income levels can become invested in their community. We think that any segregation between tenants and owners, if allowed within the development, will result in fractured zones in which lower income residents would become isolated and less invested in the success of the community.

PD-2

**AREA CONGESTION & TRANSPORTATION CONCERNS**

Accepting that most of the proposals for the development include a significant increase in the number of homes and residents, we are concerned about congestion resulting from insufficient off-street parking, added traffic, and the rerouting of Muni lines. Due to the relatively remote location, distance from services, and the area's terrain, it is likely that residents and visitors will own more cars per capita than experience with prior developments may suggest.

TR-3

- B. Therefore, we strongly recommend that the amount of off-street parking be increased throughout the development. Similarly, we suggest that essential facilities such as mailboxes, handicapped access and parking, be dispersed throughout the development to ease congestion in any one area or street.

TR-6

- C. Also, additional private vehicles and Muni routes are very likely to bottleneck an already overburdened 1200 Block of Wisconsin Street. This block is a main artery for the existing Muni routes and currently experiences traffic issues as Muni drivers attempt to navigate it. We propose that any plan include a widening of lower Wisconsin Street so that busses can pass each other without stopping, and designated no-parking bus stops or bulb outs (either on Wisconsin or 25<sup>th</sup> Street.)

TR-3

- D. To further ease the effect of increased traffic, we recommend that Muni busses on these lines be primarily hybrid electric powered.

TR-5

- E. And we also advise the addition a three-way stop sign at the perilous intersection of Wisconsin & 26<sup>th</sup> Streets. | TR-3

**QUALITY OF ENVIRONMENT**

We believe that the proposed amount of open space and leisure areas within the development is inadequate for a vibrant, thriving, community of its size. We also feel that it is important to keep the open, neighborhood environment that makes Potrero Hill a unique area of the city. | PD-4

- F. Addressing these concerns, we recommend that the Rebuild Potrero project be limited in size to 170<sup>0</sup> number of units, allowing for increased open space, recreational areas, landscaping, and off-street parking. | PD-1

- G. And we know that any community will not flourish if safety and security is not a given. We voice our support for maintaining the SFPD Substation in the new development, as well as increased street lighting throughout the development, and on the adjacent streets, including, Wisconsin, 25<sup>th</sup> Street, 26<sup>th</sup> Street, Carolina and Connecticut. | PS-1  
TR-7

Thank you again for allowing us the opportunity to address our concerns during this comment period. Please feel free to contact us at..... | GC-1

Sincerely

*Gene Jay*  
*96 Cass Ten*  
*94107*

REBUILD EIR CHANGES TO CONSIDER 12/11/14

1.TREES Chapter 4

4-15-17--4-15-18

249 significant trees were identified on the Project site.

177 are in fair or better condition.

Since it is a scientific fact the trees absorb tons of carbon yearly why are they all being destroyed?

They are mature trees, the proposed new ones will take decades to match the carbon absorption of these.

Please reconsider the destruction of the mature trees.

BI-1

2.SENIOR HOUSING PARKING

There is inadequate spaces for senior parking. As an active senior living on a steep hill you would not be able to go where and when you wanted to freely. Seniors more than any other age group need their own transportation.

Please increase senior parking spaces.

TR-6

MIXED INCOME HOUSING.

I strongly feel unless we have this, this new neighborhood will never coalesce into the one envisioned in the Rebuild project.

PD-2

GREEN SPACE.

Increase by one acre.

Grass in the new environment we have today is very water intensive. Please consider some other more native variety that will use less water.

PD-4

5.LESS COMMUNITY SPACE.

The report states there will be 15,000 sq. ft for this purpose and 50,000 sq. feet for a community center.

Currently we have 2 community centers that are actively used.

Since most new neighbors will be working we don't need that much sq.ft. for a community center.

Please reconsider and have less community space and more retail.

PD-4

6. MORE RETAIL SPACE AND FARMER'S MARKET

Many studies have shown that retail business bring neighborhoods together.

Small restaurants , coffee houses, grocery stores and most of all a

Weekly farmer's Market would really knit the various incomes together.

Especially one's that have food booths, music and small eating areas.

Regards,

PD-3

Jane Fay  
96 Caire Terrace  
San Francisco, 94107  
jnfy@aol.com







**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 3:11 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Potrero HOPE SF Master Plan Comments

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**Sarah Bernstein Jones**  
**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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** Eduardo Fenili [<mailto:efenili@gmail.com>]  
**Sent:** Monday, January 05, 2015 3:10 PM  
**To:** Jones, Sarah (CPC)  
**Subject:** Potrero HOPE SF Master Plan Comments

Hello Sarah,

I am a relatively new home owner in Potrero Hill but am a born and raised San Francisco resident and my father has run a business in Potrero Hill for the past 30 years. | GC-1

I am excited at the prospect of revitalizing the Annex and Terrace areas and hope that it is a welcome change for the entire neighborhood...above all those currently residing there. | GC-1

That being said, I believe that the current project scope over-reaches in an attempt to maximize units in the space vs. making it a truly functional addition to the neighborhood. You aren't just talking about 1100 more units but potentially 5000+ more residents in a part of town without the infrastructure to support it. Potrero Hill has a neighborhood feel and while I think the change will be good I think modesty has it's merits here. | PD-1

With that, I am writing to recommend **Alternative 1** of the plan which calls for less units but uses the same foot print. I believe the only real change is removing the 65' ceiling and keeping it 40'. | AL-1

Thank you for your consideration.

--  
Eduardo Fenili



**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Wednesday, January 07, 2015 11:38 AM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Fwd: Potrero HOPE SF Master Plan Opinion

Sent from my iPhone

Begin forwarded message:

**From:** Francesca Fenili <[ffenili@gmail.com](mailto:ffenili@gmail.com)>  
**Date:** January 7, 2015 at 11:29:43 AM PST  
**To:** [Sarah.B.Jones@sfgov.org](mailto:Sarah.B.Jones@sfgov.org)  
**Subject:** Potrero HOPE SF Master Plan Opinion

Hi Sarah,

My name is Francesca and I live at Arkansas and 20th in Potrero Hill. My brother and I recently purchased a three-unit building in the neighborhood and are very excited to watch the area grow.

We are both San Francisco natives, growing up in the Outer Mission (where our parents still live) and my father has long been a small business owner in Potrero Hill. Given the weather, neighborhood feel and location, it was the perfect area for us when considering where to buy in the city.

GC-1

I frequently drive through the area in question and would love to see improvement while continuing to offer affordable housing for those in need. For this reason I'd like to express my genuine hope that **Alternative #1 plan** is passed. I think Potrero Terrace and Potrero Annex Public Housing will help improve the safety and overall value of my home and encourage more investment in the area.

AL-1

GC-1

I look forward to following the progress.

All the best,  
Francesca Fenili

-----  
Francesca Fenili  
[ffenili@gmail.com](mailto:ffenili@gmail.com)  
415.215.0840



David Glober  
624 Carolina Street  
San Francisco, CA 94107-2726

Sarah Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, California 94103

RECEIVED

DEC 31 2014  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

December 30, 2014

**Re: BRIDGE / Rebuild EIR / EIS for Potrero Hill Terrace / Annex**

Greetings,

Background information outline on me so you can "consider the source" of comments below:

- ✓ Resident of Potrero Hill since July 1995 (19 years).
- ✓ Once held a job reviewing and contributing to edits of Environmental Impact Reports.
- ✓ Have served on Boards of Directors / Executive Committees for the Potrero Boosters Neighborhood Association (neighborhood based land use community group, appointed), and Starr King Open Space (privately held 4 acre hilltop open space directly across the street from the Potrero Terrace and Annex, elected by members of local community).
- ✓ Participant for well over a year in focus group meetings of BRIDGE with residents of Potrero Terrace and Annex and residents of the surrounding Potrero Hill neighborhood.
- ✓ Participant in Potrero Terrace and Annex / Potrero Hill planning meetings, general community meetings and nutrition classes for well over a year after that.
- ✓ Background in both civil rights and environmental issues.
- ✓ Currently researching innovations in "green architecture" for real estate developers building in Potrero Hill / Dogpatch / SOMA.
- ✓ First garden manager for BRIDGE / Rebuild in Potrero Terrace and Annex in the "Family Resource Center Garden", a precursor to, and now a part of, the "Texas Street Farm".
- ✓ Participated entirely as a volunteer before being appointed to the part time garden manager position. Did not anticipate being hired in any way during 15 months of focus group meetings prior to that appointment; my impressions of BRIDGE / Rebuild pre-date any expectation of being paid, and were reinforced during my period of employment.

GC-1

When I first moved to Potrero Hill, I was quickly amazed by the extent of apartheid-like experience. I am usually a bit extraverted, and if I tried to say "hi" to any one from public housing, I usually got back a shy or cautious response at best. Having lived for four years in the northern part of Sausalito previously, immediately uphill from and adjacent to Marin City, the separation and demarcation felt even more pronounced on Potrero Hill.

During the very well attended neighborhood meetings and subsequent focus group breakout sessions in which BRIDGE / Rebuild announced its intentions and community members met to discuss existing conditions and possible improvements, I was very moved to finally meet the residents in public housing at the top of "The Hill" (as we sometimes reference the whole neighborhood) and learn about problems with lighting at the top of stairways, etc. and most of all just finally have social contact with these folks who are more my neighbors than any one living in the Mission District or Bernal Hill. The way these focus groups and subsequent community gatherings were managed by BRIDGE / Rebuild showed some real compassion and indicated more than just lip service regarding hoped-for future outcomes. Without BRIDGE / Rebuild I would probably still experience deep separation; now I have friends and acquaintances inside the Terrace and Annex.

GC-1

When I started working on the garden, I was nevertheless apprehensive. Would I get caught in some crossfire? Would people misunderstand my purpose? Would I be harassed? Would my car be broken into? For the first few months I always carried a garden hose slung around my shoulder so they would have some sense of my intentions of being there.

But what I discovered was in some ways a tighter knit and more family based community in the Terrace and Annex than in the more economically privileged larger neighborhood. Many of them still have ties to the South from their arrival during World War II to work in shipbuilding for the Navy, and I learned to say "Miss Maggie" not just Maggie, and so on, in honor of the continuation of the sense of respect for elders and generally family connections that at first surprised me.

I learned about how African Americans were not given access to home loans and were largely left behind in what became an urban ghetto that had, during the War, been a community of mixed backgrounds. I learned how at one point, decades ago, there was an offer to rebuild the worn down housing but the residents were concerned that they would be displaced and not allowed back. I gradually became more comfortable until I remember one Sunday night still gardening after sunset as a resident called down to me from her home how lovely the new flowers were I had just planted.

These folks need and deserve what BRIDGE / Rebuild can provide. Much improved housing. Safe lighting at night. Streets that are connected to the rest of the neighborhood – an end to the apartheid. Access to fresh, healthy groceries that are more about nourishing food than potato chips and alcohol, and don't require two buses and a long wait in between both to get to Safeway and back. And the kinds of exercise and nutrition programs that BRIDGE / Rebuild have already put in place for quite some time, in particular under the leadership of Emily Weinstein. Emily is especially dynamic, committed, vigorous, and some one who has built a reputation for walking the talk and getting things done. And BRIDGE / Rebuild has encouraged and promoted leadership and skill building among residents, such as Allie Ferrey as a teenager and the irrepressible Uzuri Pease-Green. The movie nights, the community walks that members of the entire neighborhood enjoy and love – **the steps have already long been in place to build community and not just housing.**

Will there be adjustments, and has it already sometimes been bumpy or confusing? Of course. I like to think that I may have contributed a few times along the way to increased communication, trust, candor, clarity, good planning, etc. as a community member and during my time as garden manager.

And the three income tiers can be a bit confusing at first also. Is this a conspiracy to just bring rich people into hilltop views? As a land use activist, this was my first concern, and I didn't surrender it lightly. But I also understand that, with the Eastern Neighborhoods Plan that focused attention on rezoning post-industrial lands, the ever-expanding pressure to bring in new population, the real estate and economic boom that is at the center of life in San Francisco at present, and also the need to cover the very long term design and development costs of overhauling so much land, housing and community infrastructure, that there is a need for high and middle income to be present along with subsidized income. But then I realized that in fact this is a model that many of us have tried so very hard to make more the norm in all the new housing development that is taking place neighborhood wide and citywide. That BRIDGE / Rebuild has the potential at least to put together true socioeconomic diversity and "show how it's done".

I also recall an interesting moment in which some members of Potrero Hill "suddenly" found out about BRIDGE / Rebuild in Potrero Terrace and Annex and protested passionately that they had been somehow left out. A proprietor of a hairdressing salon, for example, decided that if he did not know that this was happening, then the perception was that the word had not just gotten out. However, this was after the more than a year of focus groups, postings on telephone poles, and articles in the *Potrero View*. After much anger and discussion, people who had felt they were not

GC-1, cont.

properly informed, began to be brought into the overall conversation. Had there perhaps been missteps in the outreach at this point? I honestly can't say for sure. No matter what takes place in a community, it seems that until some people really get it that this is going to affect them personally in some direct or indirect way, they may not realize it's actually happening.

Whether their attention had "fallen through the cracks" or outreach had missed some key spots or key people, again I'm not sure, but I can say that BRIDGE / Rebuild very actively made sure to include every one who had felt left out, into the process, into community meetings, and made a point to address all questions as quickly and thoroughly as possible. I haven't been around quite as often in recent months, so I don't know if such disconnects and reconnects have happened since, but I do understand that the intentions of BRIDGE / Rebuild are community-building and inclusive.

There were also some moments between BRIDGE / Rebuild and the leadership of the Family Resource Center that were a bit awkward for awhile, but having been very close to all of that when managing the garden, I think at least some of that may have been a legacy of years of disenfranchisement, and I hope understandings and sharing of management practices have improved.

Additionally, the infrastructure and the extremely professional landscape architecture design on the exceptionally steep hillsides have been stellar at least in planning and early project management. The community meetings have been very consistent. The health and nutrition programs have been very steady, and the excitement of participants in Zumba and other programs have really been noticeable.

I think overall this is a program of social connection, upward mobility, dignity and economic empowerment, and urge you to endorse it moving forward.

Sincerely,



David Glober

GC-1, cont.





Sarah Jones, Environmental Review Officer, SF Planning Dept  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

**RECEIVED**

DEC 15 2014

CITY & COUNTY OF S.F.  
 PLANNING DEPARTMENT  
 M E A

To authors of the Draft EIR for Rebuild Potrero:

(For brevity the following omits appreciation for many well done parts of the Draft EIR).

It appears that the authors of the Draft EIR (DEIR) have, in regards to one fundamentally important aspect, "lost sight of the forest from the trees". Recall that a fundamentally defining aspect<sup>1</sup> of the Proposed Project is to integrate residents of low-income housing with the larger community. Furthermore, "socioeconomics and community" is a specified category of review, yet the DEIR does not define, and hence not review, where exactly the 606 low-income housing units will be located<sup>2</sup>.

This may be an unfortunate omission since the developer isn't sharing that information anymore, but there exist previously disclosed plans by the developer that will create high-density "mini projects" within the redevelopment area. What I am referring to are master plans shared in public meetings around 2010 that showed, for example, the whole block in the south-west corner of the redevelopment area as being only composed of low income housing units. The rest of the low income housing units are then similarly clustered together in two other clusters. This goes against the fundamental premise of increasing the overall population density in order to allow the low-income housing units to be integrated with the larger community.

PD-2

Appendix 1 in the DEIR shows numerous letters received from people expressing that a DEIR should address this. Also, Bullet three on page 34 in the DEIR itself even mentions this as a "known controversy", yet the DEIR does not address it. But this cannot be avoided, a final EIR can only be complete with the exact locations of the 606 low income housing units defined in a diagram along with a complete socio-economic impact analysis of the proposed locations.

If this reveals that the plan is indeed to have, e.g. a full block in the south-west corner of the development area to become essentially a new high-density "mini project", then the impact analysis should also address honestly the full socio-economic impact of creating new high density low-income clusters. It should also address the impact on the Parkview Heights community to get a whole block's worth of high-density low-income housing on its doorsteps.

Thanks for your time.

Dadi Gudmundsson (Parkview Heights resident since 2000)  
 27 Blair Terrace, San Francisco, CA 94107  
 dadi@sensoranalytics.com, 415-244-9376

PS. The back page of this letter provides additional commentary on this topic.

CC: Various Parkview Heights residents, editors of local media outlets, relevant watchdog orgs.

<sup>1</sup> See bullets two and three in "Project Objectives" (section 1.3.2, page 100 counting from first page in pdf file).

<sup>2</sup> Figure 3 in Appendix 1 shows where "affordable opportunities" will be located. But this "affordable opportunity" category is now presented as a mixture of the 606 low income housing units and other additional affordable housing and there is no way to identify, and hence review, where exactly the 606 low income housing units will actually be.

(Please note text on both sides)

**A list of frequently asked questions (FAQ) encountered by the author of this letter:**

- 1. What plans “shown in public meetings around 2010” is this letter referring to?**
  - The plan showing the south-west block of the redevelopment area as being only composed of low-income housing was shown to the author and many other residents of Potrero Hill in public “Rebuild Potrero” meetings in ~2010. The specific diagram showing this was available online at some point, but not for the past ~2 to years. The developer needs to be confronted to make this diagram public again, and available to the EIR authors so that they can review it.
  
- 2. Why would the developer want to cluster the low-income housing units into separate high-density “mini projects” within the redevelopment area?**
  - Most likely to make it easier to sell or rent market rate units to prospective customers that would be repelled by being close to low income housing units. Any such schemes will however be exposed in due time and it is best for all parties to prevent such manipulation, and associated repercussions, now during the planning stage.
  
- 3. What is the ideal solution to this problem?**
  - The ideal solution is to have the low-income housing distributed throughout the whole development. This dissipates multiple concerns and provides the economic and social integration that is the underlying reason for the overall population density increase being pursued. If that is not possible, then all Potrero Hill residents are probably best served with Reduced Development alternative 2, i.e. to just rebuild the existing buildings.
  
- 4. Is the ideal solution possible?**
  - The DEIR states (page 910) that “[low income housing will be] under management by and the ownership of the project applicant or related entities.” This makes it clear that the low-income units will be owned and managed by the owners/managers of all the units, and that the low-income units do not have to be segregated from the other units from an ownership/management perspective.
  
- 5. Can the Parkview Heights community really do anything to prevent high density “mini projects” from being created, and possibly placed at its doorsteps?**
  - (Note: the author of this letter is not on the board for the association, all board actions proposed are speculative). With a 200+ unit strong HOA, Parkview Heights has the financial resources to hire strong legal help. The Parkview Heights community could pursue various legal motions and stays to make sure that its rights & well-being, and the rights & well-being of the low-income residents, are not compromised by condensing the low-income units into high-density “mini projects”, and placed at Parkview Heights’ doorsteps.

PD-2, cont.

GC-1

**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Wednesday, January 07, 2015 8:16 AM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Comments on DEIR Potrero HOPE SF, Case No. 2010.0515E

---

**Sarah Bernstein Jones**  
**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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** Alison Heath [<mailto:alisonheath@sbcglobal.net>]  
**Sent:** Tuesday, January 06, 2015 6:43 PM  
**To:** Jones, Sarah (CPC)  
**Subject:** Comments on DEIR Potrero HOPE SF, Case No. 2010.0515E

Dear Ms. Jones,

While I am in support of many of the objectives of the redevelopment of the Potrero Terrace and Annex project as mixed income housing, I have concerns with the loss of vistas at the top of the hill and from the Potrero Hill Rec Center. I urge the Department to consider reduced heights and density on the western side of the project by perhaps increasing density lower on the slope. I believe that including publicly accessible open space, as a park at the top of the hill, would better serve the public realm, as well as providing enhanced recreational opportunities for all residents. The current proposal favors the interests of those in market-rate housing. As you are well aware, the General Plan protects vistas from public parks. As one of the most spectacular views on the eastern side of San Francisco, this particular vista should certainly be preserved.

AE-3  
AL-1  
PD-4  
AE-1

Sincerely,  
Alison Heath  
333 Mississippi St.  
San Francisco, CA 94107

**Alison Heath**  
<http://www.alisonheath.com>  
[alisonheath@sbcglobal.net](mailto:alisonheath@sbcglobal.net)



**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 9:04 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Fwd: Rebuild Potrero Draft EIR Comments

Sent from my iPhone

Begin forwarded message:

**From:** Richard Lee <[richard@lee.name](mailto:richard@lee.name)>  
**Date:** January 5, 2015 at 8:42:35 PM PST  
**To:** <[Sarah.B.Jones@sfgov.org](mailto:Sarah.B.Jones@sfgov.org)>  
**Subject: Rebuild Potrero Draft EIR Comments**

Hello-

I'd like to provide some feedback on the Draft EIR for the Rebuild Potrero project. I have noted from the Draft EIR the following troubling issues:

GC-1

1) 25th Street Traffic:

Problem:

Table 5.7-6 projects that roughly 50% of the evening traffic for the whole complex will go through the intersection at 25th and Texas streets, which likely means a lot of that will be via 25th street from Pennsylvania. In table 5.7-9, the level of service for this intersection drops by two letter grades, from A to C (the largest drop in any intersection studied), and traffic delays double. By 2030, Table 5.7-16 says to expect it to drop further to grade D with triple the delay of the no development option.

Also, in table 5.8-4, projects a 5dB increase in noise along 25th street from Texas to Indiana due to traffic. 5dB is roughly a 50% increase in the level of noise.

NO-2  
TR-3

Additionally, this is a narrow road that cannot be widened due to a cliff on one side.

Proposed Solution:

Reroute traffic in/out of the project area by using the much higher capacity Connecticut to Cesar Chavez street connector. Ideally, 25th street between Texas and Pennsylvania would be closed to through traffic. At a \*minimum\*, a traffic signal should be installed at the corners of 25th/Texas and 25th/Pennsylvania that would discourage use of 25th street to enter the project area through the use of long light times, restricted turn signals, etc.

2) Mississippi Street Parking

TR-6

Problem:

The parking studies described in Figure 4.7-5 undertaken in the EIR fail to address the Mississippi street area, despite the fact that this area is a half block from the project area, and likely to be used for overflow parking. The study considered street parking several blocks to the north and west of the project. Why zero blocks to the east?

TR-6, cont.

Proposed Solution:

Add a parking study for Mississippi and 25th street between Texas and Pennsylvania. Address any impacts on future street parking in this area by adding more parking to the southeast corner of the project.

3) Caltrain ridership analysis

Problem:

The EIR seems to indicate in table 5.7-14 that they expect the project to have virtually no impact on Caltrain ridership, despite the fact that a new bus line will run through the center of the project directly to the 22nd street Caltrain station. I suspect there will be a \*dramatic\* impact on Caltrain ridership. This is already a heavily impacted station, where often there is only standing room on the train during commute hours.

TR-5

Proposed Solution:

Revise the transit studies to accurately reflect the likely impact on Caltrain. Hint: it is more than 4 rides per day. Work with Caltrain to add additional trains to accommodate the increased load.

4) Muni stops

Problem:

The Muni changes described in figure 5.7-6 indicate that the stops for the 10 and 48 that currently are at Texas and 25th Street will be moved/replaced with new stops that are up to 4 blocks further away.

TR-5

Proposed Solution:

Move the 48 stop to 25th and Missouri.

Reroute the 10 so that it travels east/west along 23rd street and down Missouri to 25th Street, and add a stop at 25th and Missouri.

Consider rerouting the 58 up Texas street instead of Missouri, and add a stop at 25th and Texas.

5) Retail space

PD-3

Problem:

Given the increase in density, there does not seem to be a corresponding increase in services, as there is a very small retail zone planned for the center of the project area. Currently, this portion of Potrero Hill is very under serviced, requiring trips out of the area for groceries, shops, restaurants, etc. There is currently planned only a tiny bit of retail on one side of a block or two near the central park area.

PD-3, cont.

Proposed solution:

The plan should include ground level retail shops on \*most\* streets to accommodate grocery stores, coffee shops, and restaurants within walking distance of most residents.

6) Project scope

Problem:

Given the above traffic concerns, it seems that the project scope may be too large for this area, as it is poorly connected to the rest of the city due to existing geographical constraints, and there seems to be insufficient planning to make this a neighborhood in its own rights with local business services that would reduce the need for people to travel to other parts of the city.

AL-1

Proposed solution:

Reduce the scope of the project to a fewer number of units, such as Alternative 1.

Richard Lee  
1099 Mississippi Street #9  
San Francisco, CA 94107





January 4, 2015

**RECEIVED**

San Francisco Planning Department  
1650 Mission St. Suite 400  
San Francisco, CA 94103

JAN 05 2015  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Attention: Sarah Jones, Environmental Review Officer

Subject: Draft Environmental Impact Report/Environmental Impact Statement for the Potrero HOPE SF Master Plan Project

Dear Ms. Jones:

The scope of the project is very large and many aspects of it are thoughtful. However, the proposed buildings on 23<sup>rd</sup> Street between Arkansas & Wisconsin Street will make the area feel too dense with buildings that are too high.

PD-1

This will create a negative impact on the buildings directly across the street from the project. For those buildings currently on 23<sup>rd</sup> Street, the proposed buildings would block their entire view, deprive them of the direct heat generated from the sun, will have a negative visual impact on the community at large, and will bring more traffic than the narrow road was meant to handle.

AE-4  
WS-3

We hope the proposed buildings on 23<sup>rd</sup> Street can either be removed from the master plan or relocated to an area that is less obtrusive. This will also help to minimize the visual footprint of this large-scale project.

Thanks for your attention to this matter. I hope to hear back from you.

Please do not hesitate to contact me if you have any questions or comments.

GC-1

Regards,

Homer Lee  
President, Potrero Nuevo HOA  
1812 23<sup>rd</sup> Street  
San Francisco, CA 94107  
Phone: (415) 282-1862  
Email: leehomer@netzero.net



RECEIVED

JAN 07 2015

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

**Linda D. Marini**  
**16 Blair Terrace**  
**San Francisco, CA 94107**

January 7, 2015

Ms. Sarah Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Ms. Jones,

**RE: Potrero Hope SF Master Plan EIR**

This is written in response to the above-referenced EIR. As a 30 year resident of Potrero Hill, I am saddened to view the details of the EIR related to this site.

GC-1

I respectfully request the City to reconsider approval of the project in light of the following concerns, and remand the plans back to the developer for major revision.

**Height and Density:** The plans do not fully address the environmental and social impact of the tall, dense dwellings which are inconsistent with existing architecture of Potrero Hill, and appear inconsistent with City policies and mandates regarding hilltop open space, public parks, and vistas.

PD-1  
AE-1

**Segregation Based on Income Levels:** Though the project purports to provide economic diversity, the clustering of the low income units in the south side is inconsistent with best practices in contemporary, mixed-use housing development and perpetuates segregated communities similar to mid-century public housing models (or, at worst, South Africa apartheid). It is incomprehensible how such a plan would be developed and approved in San Francisco, particularly when similar public housing developments have fostered crime, filth, and adversity among City residents. Other models, which integrate and disperse low income units throughout the entire development, must be considered to ensure harmony, equity, safety, and fairness for all of our residents. We do not need "separate, but equal" facilities in our progressive, compassionate City.

PD-2

**Lack of Appropriate Infrastructure:** The plan fails to contemplate how residents will easily access commercial, social, educational and recreational facilities in the neighborhood. For example, it is clear from construction and trailer bungalows at Starr King Elementary School that there is already a significant need for classroom space in the immediate vicinity, let alone other facilities and services needed for multigenerational residents. However, the limited options within the planned development cannot possibly be sufficient given the density levels proposed. Moreover, as parking is severely limited and it is virtually impossible for all but the most athletically fit individuals to walk or bicycle up the hills, it is unclear how public transit services will be able to meet all needs.

PS-2  
TR-6

**Lack of Commercial Services on the South Side:** Though the plan touts additional commercial space, in reality, the south side lacks any possibility of stores, restaurants, cafes, libraries, or any type of public gathering spaces which could contribute to a vibrant community. The absence of such services, combined

PD-3

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with the steep terrain, will result in isolated individuals, families and groups, which is unhealthy and regressive.

PD-3, cont.

Please do not approve the plan until these serious issues are addressed. Though I have tried to engage with the project managers and legislators throughout the development of this project, my concerns, as well as those of numerous neighbors, have been disregarded thus far.

GC-1

Sincerely,

  
Linda D. Marini

cc: Honorable Malia Cohen, Supervisor, District 10

**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Wednesday, January 07, 2015 2:40 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Comment on DEIR 2010.0515E, Potrero HOPE SF

---

Sarah Bernstein Jones  
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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

-----Original Message-----

From: Yoram Meroz [<mailto:ymeroz@fastmail.fm>]  
Sent: Wednesday, January 07, 2015 2:26 PM  
To: Jones, Sarah (CPC)  
Subject: Comment on DEIR 2010.0515E, Potrero HOPE SF

Dear Ms. Jones,

I support the rebuilding of the Potrero Terrace affordable housing projects so as to provide healthier, safer and more comfortable living conditions to its present and future residents. I am however concerned about the impact of the market-rate housing construction described in the EIR, on public vistas, and question the use of public land and resources for the construction of for-profit housing.

GC-1  
PD-7

The location, at the top of Potrero Hill, offers unequalled public views to the east. Renderings given in the EIR indicate that public views will be blocked by the project as proposed. In particular, the row of 65' buildings at the northern end of the proposed project will have the greatest impact.

AE-3

The 65' buildings are slated to contain market-rate housing. In effect, the unique views of this site will be permanently taken away from the public and sold to a select few who can afford to pay for them. This is an inappropriate use for land put in the public trust and intended to benefit the public. In addition, as the DEIR states, no comparable land exists in the city for the construction of subsidized housing. Any land used for market-priced housing on the site will permanently replace future potential sites for the construction of affordable housing. While alternative 1, as described in the DEIR, alleviates some of the visual impacts of the proposed project, it retains a large proportion of the site for market-rate apartments, which I consider a misuse of rare public land.

PD-7

With these points in mind, I urge that alternative 2 described in the DEIR be adopted, with a replacement of the existing housing.

AL-2

Sincerely,

Yoram Meroz  
Potrero Hill

Dennis Montalto  
1504 25th Street  
San Francisco, CA 94107

Office & Fax 415- 285-8633  
Cell 415-822-8020  
dennismontalto@sbcglobal.net

Re: Potrero Hope SF Master Plan (case No. 2010.0515E)

1/4/15

Commissioners,

Like most of Potrero Hill residents I look forward to changes to Potrero Terrace and Annex. I've attended numerous meetings sponsored by Bridge Housing Corp. and from the start of this project I was opposed to the massive scope of this project. If this project is allowed to go forward I believe the quality of life on Potrero Hill will be severely impacted. The proposed project is way out of scale both in density and height limits for Potrero Hill. As a close neighbor to the project I have concerns in regards to construction phasing spanning 10 years or longer.

GC-1

PD-1  
PD-6

I urge the commissioners to consider Reduced Development Alternative 1. I believe this plan is viable for Bridge to see a profit and lessen the impact of the proposed project.

AL-1

Sincerely,

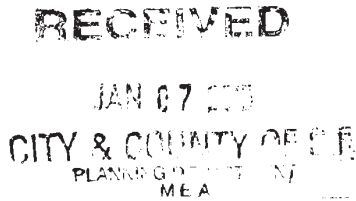
Dennis Montalto





January 6, 2015

1814 23<sup>rd</sup> St  
San Francisco, CA 94107



Sarah Jones  
Environmental Review Officer,  
San Francisco Planning Department  
1650 Mission Street, Suite 400,  
San Francisco, California 94103

RE: Rebuild Potrero EIR Feedback

Dear Ms Jones:

Thank you for the opportunity to submit comments on this report.

I am a resident of Potrero Hill since 1991 and my home is located on 23<sup>rd</sup> St, which borders the proposed development. My concerns are as follows;

- 1. The proposed development would obliterate the panoramic views along street level of 23<sup>rd</sup> St, between Wisconsin and Missouri Streets. This important viewshed affords almost 180 degree open space views of the San Bruno Mountains and the San Francisco Bay. The uniqueness and beauty of this view cannot be overstated. The vast open space is food for the senses and has therapeutic value. Watching the fingers of fog roll in over the city from here is a magical experience. Again I am referring to the view from street level, which can be enjoyed by all present and future residents and visitors of this part of the hill.  
It is my understanding that the Master Plan for the City of San Francisco calls for the protection of Greenspace and water views and I urge you to enforce these protections. I propose that the buildings for this area be built adhering to the current rooflines of the existing development so as to preserve these views for future generations.
- 2. It is also my understanding that the proposed development would block the view of the trees and green area of the Potrero Hill Playground from other parts of the city, such as Bernal Heights Park and the 280 Connector. I see that the Master Plan for the city calls for protecting such landmark views and I urge you to enforce this protection.
- 3. Chapter 4 of the EIR, figure 4.2.2 shows incorrect zoning for my block. It looks like the entire block on the north side of the street, across from the proposed development is zoned as NC-1 for Neighborhood Commercial use. In reality, only one building on this block is commercial, the convenience store at the corner of Arkansas and 23<sup>rd</sup> St. The other two buildings on this block are condominiums with parking garages fronting the street. I wonder how this significant error has impacted the decisions made or to be made regarding the proposed construction across the street.
- 4. If the development is allowed to proceed as planned, the 4 storey building to be built across the street from my building will be too high compared to the existing buildings on the North side of the street. I am concerned about loosing natural light in my home.

GC-1

AE-3

AE-1

AE-1

AE-3

LU-1

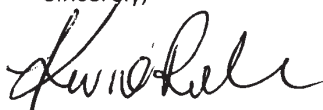
WS-2

- |  |      |
|--|------|
| 5. The proposed buildings for the 23 <sup>rd</sup> Street block between Arkansas and Connecticut are 6 storeys and this will cast shadows over the park across the street. I would urge that any buildings on this block be designed to preserve the natural light and views from this public park.  | WS-2 |
| 6. The proposed parking ratio of One Covered Parking Space for every Two units is not sufficient and will result in a shortage of parking for neighbors and residents of the development. I understand that CEQA allows a lower threshold, but it seems to me that this policy does not take into consideration the steep hill on which we live. This area is not suitable for much walking and biking is almost impossible due to the steep grade. Also, since the likely occupants of the new homes will be affluent enough to own a car, I hope that this important resource is planned accordingly. At a minimum, it should be One Covered Parking Space for each home. In my building, many units have two cars, so this is a realistic compromise. | TR-6 |
| 7. I note that the plan calls for a maximum of 603 subsidized housing units. This is the bare minimum to replace the existing units. Not even ONE new subsidized unit! Surely, now would be a good time to add some additional subsidized units. I think that a project of this scope that hopes to add over 1,000 additional units could find the money to add some more subsidized units. I proposed an increase of 10%, 60 more subsidized units. I also support my neighbors who call for these units to be distributed evenly throughout the new development, not concentrated in one block.  | PD-2 |
| 8. As referenced in the EIR, there will be a major impact to the intersections of Vermont and Ceasar Chavez St and also 25th St and Pennsylvania Street. I hope you can ensure that traffic signals will be installed in these areas to ensure safe and timely passage through these intersections.  | TR-3 |
| 9. If now is the time that the new street to be created between 24 <sup>th</sup> St and 25 <sup>th</sup> St is named, then I hope someone can come up with a more imaginative name than 24 1/2 Street. Perhaps a name in honor of an important historical figure from the neighborhood.  | GC-1 |
| 10. With all the open space allocated within the development, I hope it will be possible to allocate some for a small fenced in dog parklet or two. I do not see any outlined in the report.   | PD-4 |

Thank you for taking the time and consideration to review my comments. If you have any questions, you may reach me at 415-797-8505.

GC-1

Sincerely,



Kevin O'Rourke

Please see photo attached on following page.



**View from street level at corner of 23<sup>rd</sup> and Arkansas Streets**

The view encompasses the Bay and East Bay Hills on the left, Candlestick Point due south and the San Bruno Mountains to the

The view is much better in person and I encourage you and members of the Planning Commission to come out to see it in person. Any decision on allowing construction to block this view.



**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 9:04 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Fwd: Potrero Hope: Reduced Dev Alt #1

Sent from my iPhone

Begin forwarded message:

**From:** Daniel Raffel <[daniel.raffel@gmail.com](mailto:daniel.raffel@gmail.com)>  
**Date:** January 5, 2015 at 8:47:56 PM PST  
**To:** [Sarah.B.Jones@sfgov.org](mailto:Sarah.B.Jones@sfgov.org)  
**Subject: Potrero Hope: Reduced Dev Alt #1**

Greetings, I am writing as a home owner at 1431 20th street to voice support for the Reduced Development Alternative #1 for Potrero Hope. Our neighborhood does not need even more development. We do not need more vehicles, etc coming and going. Please do not increase the size of the development. And, in fact, reduce it.

Regards,  
- Daniel Raffel

AL-1



December 21, 2014

Environmental Review Officer  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Subject: Draft EIR/EIS for the Potrero HOPE SF Master Plan**

To Whom It May Concern:

Thank you for the opportunity to review and comment upon the Draft EIR/EIS for the Potrero Terrace and Potrero Annex public housing redevelopment proposal. As a former resident of San Francisco’s Mission District, I appreciate the project applicant’s concern over the City’s severe shortage of housing stock that is affordable to low-income residents, as well as the need to upgrade the housing options that are available to those in need of public assistance. As a student of architecture, urban design, and urban planning, I also appreciate the obvious diligence and care that went into the development of the proposal. The proposed master plan design would improve residential density, neighborhood connectivity, walkability, green and open space, social and economic integration, and aesthetic cohesiveness with the surrounding urban context over the original 1941 design. San Francisco needs this kind of high-quality public housing.

GC-1

GC-1

The main purpose of this letter, however, is to comment on the process and content of the Draft EIR/EIS document itself. My first critique is that, at 926 pages (excluding Appendices), the document is far too long. While I recognize that the preparers are expected to be comprehensively thorough in their preparation and research, the average citizen is unlikely to read a document of nearly a thousand pages. Large quantities of legal and scientific background information could have been incorporated by text reference, by Web hyperlink, or in the Appendices, and information that was repeated across multiple sections and alternative proposals could have been condensed. These changes would have yielded a more manageable document that would encourage more substantive public review, engagement, and participation.

OC-1

My other comments are organized according to the relevant sections of the Draft EIR/EIS.

■ **Visual Quality/Aesthetics**

The visual simulations contained in this section consist of photomontages of current site conditions with a SketchUp three-dimensional schematic model of the proposed designs. These simulations are quite effective in communicating the scale, urban spatial character, degree of articulation, and overall visual impact of the proposals. However, the individual

AE-2

buildings show very little design development, which no doubt reflects the early stage of the project at the time of publication.

The text assures us that the project will follow the City’s established design guidelines and fit with the surrounding context, but a visual indication of representative façade materials and details would have helped the reader imagine the project as an integral part of the Potrero Hill neighborhood.

AE-2, cont.

■ **Socioeconomics and Community**

This section gives a thorough explanation of the expected displacement, population growth, physical barrier, and employment effects of the proposed project and alternatives, and cites findings of “No Impact” or “Less than Significant” for each effect. These findings seem reasonable and well supported, with the exception of the displacement effects.

While some degree of temporary resident displacement is probably inevitable in this type of project, and while the project applicant cites measures such as on-site relocation, housing vouchers and rent subsidies, and a collaborative Relocation Plan, more attention should be paid to the social effects of the relocation. The text dismisses such hardships as packing, reestablishing routines and services, and changing schools as “inconveniences” and claims with minimal evidence that they would not permanently disrupt social networks. In the interest of conservatism, the displacement effect should be upgraded to “Significant” or “Less than Significant with Mitigation” and list the aforementioned measures as mandatory mitigations to ensure that they are faithfully carried out.

SE-2

■ **Transportation and Circulation**

This section contains an extended analysis of the proposed projects’ expected effects on trip generation, mode split, regional distribution, and loading and parking demand, as well as effects on the Muni bus lines serving the area and bicycle and pedestrian infrastructure. The mitigation measure of contributions by the project applicant toward improvement of the 10 Townsend bus line seems reasonable in light of the expected ridership increase due to increased resident population, and this measure will benefit other neighborhoods served by the 10 Townsend as well.

TR-5

The proposed changes to the pedestrian environment, such as continuous sidewalks, bulb-outs, crosswalks, and so on, will also be significant improvements to the existing condition. However, the text states that pedestrian activity within the project site is “expected to be low to moderate” (p. 518) simply because little pedestrian activity was observed under existing conditions. This statement represents an unsupported assumption that the site’s current residents will not walk to the nearby school, health clinic, retail stores, or recreation center even with improved pedestrian conditions.

TR-7

It is equally likely that the existing site’s unsatisfactory pedestrian environment makes walking an unfeasible or unpleasant transportation choice, and that residents will walk if



provided with necessary infrastructure and desirable destinations. The type of low expectation for the site's residents reflected in this statement is condescending at best and should be avoided in this document.

TR-7, cont.

■ **Noise**

This section cites two significant impacts due to noise generated by the project. The first concerns excessive but temporary noise from heavy equipment, power tools, and so forth during the construction process; this impact will be mitigated to "Less than Significant" levels by the development and implementation of a Construction Noise Plan. The second is "a substantial permanent increase in ambient noise levels" (p. 608) due to the increase in vehicular traffic that the project would induce, and no mitigations are offered for this impact.

NO-1

A missing element that should have been addressed in this section is the possible impact of ambient noise from the surrounding highways, rail lines, and other sources upon the residents of the site. The project applicant may have no means of addressing these sources given the existing site's location and context, but their impacts should be documented out of concern for residents' health and quality of life. The project applicant should then use this documentation, together with the finding of a significant increase in traffic noise, to support the specification of additional acoustic insulation in the housing units' exterior walls.

NO-2

■ **Air Quality**

This section correctly notes that the construction process for this project will result in significant air quality impacts due to excessive emission of air pollutants. Sources will include on-road and off-road construction vehicles, vehicles used for transportation to and from the site, diesel generators, off-gassing from building materials, and airborne dust generated by construction activities. The document also notes that, without mitigation, these emissions will result in a significant increase in lifetime cancer risk for nearby residents and school children.

AQ-1

Mitigation measures for these impacts include timeline planning and reporting of the use of construction vehicles, engine efficiency and emissions requirements, limiting vehicle idling time, minimization of the use of diesel generators, and dust control measures. These mitigations are all helpful and necessary; however, while the document identifies off-gassing of architectural coatings as a primary emissions source (p. 639), it offers no details, quantification, or mitigation of this source. Volatile Organic Compound (VOC) off-gassing from building materials is known to be significantly detrimental to indoor air quality. Therefore, expected VOC levels in this project and their associated health risks should be quantified and reported, and the project applicant should specify the use of low-VOC paints, coatings, carpets, and other finish materials in the residences.

AQ-5

■ **Greenhouse Gas Emissions**

This section reports a net increase in GHG emissions for the proposed project of 7,854 metric tons of CO<sub>2</sub> equivalent per year (MTCO<sub>2</sub>E) from a combination of additional vehicle trips, energy usage, waste generation, and other sources. This increase is well below the Clean Air Act's reporting limit of 25,000 MTCO<sub>2</sub>E, and the listed project alternatives would each result in smaller increases or, in the case of the Housing Replacement alternative, a net decrease of 117 MTCO<sub>2</sub>E.

These levels are satisfactory in support of the document's finding of "Less than Significant" GHG impacts with respect to CEQA and NEPA criteria. However, due to the serious and pressing threat of global climate change, there is always room for improvement. This document and others like it should include a full accounting of the data, estimates, and assumptions behind the cited figures. This information will enable the pursuit of further efficiency improvements and emissions reductions in building and site design, transportation strategy, waste management, and other domains.

GG-1

### Conclusions

I would very much like to be notified of the lead agency's responses to my critiques, as well as the future status of the Potrero HOPE SF Master Plan as it moves through the planning and development process. Thank you again for the opportunity to comment on this document.

GC-1

Sincerely,

Daniel Reid  
M.Arch/MCRP Candidate  
University of Oregon  
[dreid2@uoregon.edu](mailto:dreid2@uoregon.edu)

Department of Planning, Public Policy, and Management  
University of Oregon  
Eugene, OR 97403

From: Nathaniel Robbins, MD  
1816 23<sup>rd</sup> St  
San Francisco CA 94107

To : Sarah Jones, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, California 94103

December 11, 2014

Ms. Jones:

I am writing today as a concerned neighbor in response to the Potrero Hope SF EIR/EIS. While I support the effort to redevelop the Potrero Annex/Potrero Terrace projects, I have a number of concerns about the size, scope, and specifics of the Proposed Project that I do not feel were adequately addressed in the EIR/EIS. In several incidences, the EIR/EIS presents information that is inaccurate and misleading. I believe the EIR/EIS should be redone and/or amended, and the plan brought in line with Environmental Mandates and with the SF Planning Department’s goals and policies.

GC-4

This letter details several concerns with the EIR/EIS and demonstrates that the EIR/EIS directly contradicts the SF Planning Department’s Objectives and Poicies, as well as environmental mandates required by California and National Law.

In particular, my concerns pertain to the following:

Section 1: Views/Aesthetics – At the proposed height, the buildings of the Proposed Project bordering on 23<sup>rd</sup> St. (K-M) will obstruct the viewing corridors on the street level from 23<sup>rd</sup> street and from the south side of the Potrero Hill Recreation Center. This obstruction will significantly impact pedestrians, residents, users of the park, and the broader community. These views are part of the treasured open spaces of our community and obstructing them is not consistent with SF Planning Department’s plans and goals for development. The information presented in the EIR/EIS is clearly misleading and the conclusion reached in the The EIR/EIS that the development will have a “less than significant” effect on View and Aesthetics (Section 5.3) is therefore invalid.

AE-3

Section 2: Shadow - The height of the Proposed Project buildings on 23<sup>rd</sup> St. will cast shadow on 23<sup>rd</sup> St. and the Potrero Hill Rec Center, which will significantly impact pedestrians, residents, users of the park, and the community. The information in the EIR/EIS regarding public use of these areas (Section 5.11) was misleading. The Proposed Project directly contradicts the SF Planning Department Goals regarding shadow and should be amended to address these inconsistencies.

LU-2  
WS-2

Section 3: Public space, public transportation, and road usage - The population of the Proposed Project is too large for the surrounding community, particularly in terms of the usage of public space (such as the Potrero Hill Rec Center), public transportation usage, and road usage. Of particular concern is the fact that the commuter analysis was undertaken five years ago and therefore does not reflect the rapidly evolving nature of San Francisco commuting. Substantially more commuters now commute from San Francisco to the South Bay. The Proposed Project directly countermines the SF Planning

TR-3

Department Goals regarding public space use, transportation usage, and road usage, and should be amended to address these inconsistencies.

TR-3, cont.

Section 4: Community integration, open spaces, and responsible development – The Proposed Project prioritizes the number of units (and perhaps profit) over incorporating the development into the existing neighborhood, encouraging open spaces, and including design elements consistent with modern and sustainable urban development. This is directly in contrast with SF planning goals.

LU-1

I urge you to undertake a full review of the EIS/EIR and to ensure that the plans for the development are revised to ensure that the character, open spaces, views and light of Potrero Hill are protected.

Thank you in advance for investigating these points and working with me and other members of the community to ensure the best possible future for San Francisco and its residents.

GC-1

## SECTION I – VIEWS/AESTHETICS

### Introduction

This section demonstrates that the Hope SF Master Plan EIR/EIS grossly misrepresents the facts in the section that addresses the question of how views will be affected by the Proposed Project. The EIR/EIS was negligent in properly characterizing the effects of this development as currently proposed on the views from the public spaces of South Potrero, including the South End of the Potrero Hill Recreation Center, as well as the pedestrian thoroughfares of Wisconsin and 23<sup>rd</sup> st.

#### 1.1 Hope SF Master Plan EIR/EIS treatment of Views/Aesthetics

The EIS/EIR assesses impact on Views/Aesthetics in “Section 5.3: VISUAL QUALITY/AESTHETICS.” The report provides a “Context and Intensity Evaluation Guidelines under NEPA,” found in Appendix 10f of the EIS/EIR.

Section 5.3 of the EIR/ EIS states that under NEPA, the Proposed Project or its alternatives would not block or disrupt views of scenic resources or reduce public opportunities to view scenic resources. The document then goes through a lengthy discussion that focuses on 9 select viewpoints. The document ultimately concludes that:

*“in general, the Proposed Project would noticeably alter the visual character of the Project site compared to existing conditions; however, this impact **would not be significant**. While changes to the street grid, building configurations, landscaping, and other related elements would vastly alter its appearance, the visual quality of the Project site would generally be considered an improvement compared to existing conditions. Therefore, although the scale and residential density would increase at the Project site, the Proposed Project would not substantially degrade the existing visual character or quality of the site or the area or impact public view corridors. For the reasons stated above, the Proposed Project would result in **less-than-significant** impacts related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area.” (5.3.24 p 46)*

AE-1  
AE-2  
AE-3

#### 1.2 Response

In fact, the Proposed Project will have significant negative impacts on “related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area” according to NEPA guidelines. The proposed project will completely block the public views from 23<sup>rd</sup> St and negatively impact the view from the southern aspect of the Potrero Hill Rec Center on the ballfield looking south.

The conclusions of the EIS/EIR report are based on nine views. However, these views are incomplete selections that do not properly represent the views from the Project site location. In addition, they misrepresent the views of the sections they claim to represent and systematically fail to represent the best views of the neighborhood. These views will be irrevocably ruined by the proposed project.

It is irresponsible and inappropriate to sacrifice San Francisco’s world renowned public views for private development. As currently designed, the Project will construct units with outstanding views in the 45 foot and 60 foot buildings on 23<sup>rd</sup> st and bordering the Rec Center, in order to maximize the value of market rate apartments. The views from these private apartments will come at the expense of blocking

the public space. The Developers are clearly building such tall buildings in order to maximize the value and number of market-rate apartments, rather than opting to preserve the public views and open space by building further down the hill (and thus sacrificing some of the views, and thus value of the new apartments)

I implore the responsible regulatory agencies to act responsibly and not sacrifice taxpayer and public space; the area can still be developed with slightly shorter buildings. Alternatively, tall buildings can be built on 25<sup>th</sup> st at the bottom of the hill, preserving the views from the top while still maintaining density. I implore the responsible regulatory agencies to reconsider auctioning off our community common spaces for profit.

I hope that the Project can be amended to comply with SF Planning Department Goals and National Law (namely?) by building shorter buildings, thereby avoiding the ruin of the public spaces that form the heart and soul of San Francisco and the South Potrero Neighborhood.

*Viewpoint 1: 22<sup>nd</sup> St Trail Looking East*

Viewpoint 1 in the EIS/ EIR is a photograph of the top of the footpath looking east. The photograph included in the report shows a very limited scope and fails to demonstrate the beauty of our neighborhood and is not representative of the views that will be irrevocably ruined by the proposed development. The photographs below (A-D) are taken a hundred feet or so further down the footpath, from the northeast corner of the Potrero Hill Recreation Center. Each of these photos shows that the views jeopardized by the proposed project are stunning vistas of the Bay, San Francisco and surrounding towns – rather than the unattractive view presented in Viewpoint 1. It is notable that this part of the Rec Centre is a very well used: while I was out taking these photos over 15 minutes, I encountered 20-30 other individuals of all ages strolling around the Park enjoying these views.

Photograph A (southeast corner of the Park facing East/Southeast with the park and current housing in the forefront, the Dogpatch in the midground, and the Bay and Oakland hills in the background)

AE-1, cont.  
AE-2, cont.  
AE-3, cont.

AE-2  
AE-3



AE-2, cont.  
AE-3, cont.

Photograph B (southeast corner of the Park facing East with the current housing in the foreground)



AE-2, cont.  
AE-3, cont.

Photograph C (southeast corner of the Park facing East/Southeast with current housing in foreground)





AE-2, cont.  
AE-3, cont.

Photograph D (southeast corner of the Park facing East with housing in the foreground, the Dogpatch in the mid-ground, and the Bay and Oakland docks in the background)



AE-2, cont.  
AE-3, cont.

These views are outstanding and are currently widely enjoyed by the community. By limiting consideration to Viewpoint 1, the EIR/EIS fails to address the impact of the Proposed Project on the public spaces of the Potrero Hill Rec Center.

*Viewpoint 2: Potrero Hill Recreation Centre, Looking South*

Viewpoint 2 shows the ballfield and pedestrian path that circles the Rec Center - traditional places in the neighborhood to exercise, play sports, read, watch the sunset, and enjoy the outdoors and the environment of San Francisco. It is one of the most outstanding south facing views in the city in all of San Francisco, and a core component of the aesthetics and feel of the neighborhood.

The EIS/EIR report concludes that the view from Viewpoint 2 is "considered of low to moderate quality," due to the intervening fence and foliage, and because people generally do not sit and watch the view but instead tend to just pass through. However, the picture displayed in the EIS/EIR report (Viewpoint 2) is deliberately misleading: it is taken well back from the fence, so that the baseball field takes up most of the picture in the foreground. In actuality, the view from the baseball field is expansive, and putting tall buildings near 23<sup>rd</sup> street and the park to block that view would have a significant negative impact. The baseball field and the path that circles the field is widely used by the community, and sacrificing the Bay and Hill views from these public spaces in order to build beautiful views from private apartments is inexcusable.

AE-2  
AE-3

Here are photos I took (E-F) from a handheld phone facing southeast and southwest from the foot path immediately on the south side of the fence that circles the Rec Center and provides a scenic running pathway central to our neighborhood:

Photo E (facing South/Southwest from the south side of the baseball field with the current housing in the foreground, the Starr King Elementary School in the mid-ground, and the San Bruno Mountain the background)



AE-2, cont.  
AE-3, cont.

Photo F (facing South/Southeast from the south side of the baseball field with 23<sup>rd</sup> street in the foreground, I-280 in the mid-ground, and the Bay and East Bay in the background)



AE-2, cont.  
AE-3, cont.

Photo G (facing South/Southwest from the footpath on the south side of the baseball field)



AE-2, cont.  
AE-3, cont.

Photo H (facing due South from a different part of the footpath on the south side of the baseball field)



AE-2, cont.  
AE-3, cont.

Photo I (facing due South/Southeast from a different part of the footpath on the south side of the baseball field highlighting the expansive Bay Views)



AE-2, cont.  
AE-3, cont.

Unfortunately I could not go on the baseball field and take the pictures through the fence because the field was flooded from the record rains (replace with photos). The view from field through the fence magnificent and enjoyed frequently and thoroughly by the community. Importantly, the EIS/EIR neglected to mention the footpath that circles the baseball field and providence an opportunity for walking and viewing the sunset, and which would suffer from obstruction from the new buildings.

Blocking the view from with the Proposed Project buildings is a blow to our neighborhood and to our city, and indeed an affront to the neighbors and citizens who have lived in this area and utilized the open spaces for years.

Furthermore, it directly countermines the SF Planning Department Objectives and Policies, including the following from the General Plan (POLICY 3.1.5 - Respect public view corridors; Plan for Urban Design, which asserts that “massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city”; that “Building siting and massing with respect to street pattern influence the quality of views from street space”; “where large parks occur at tops of hills, lowrise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city”; “Views contribute immeasurably to the quality of the city and to the lives of its residents. Protection should be given to major views whenever it is feasible, with special attention to the characteristic views of open space and water that reflect the natural setting of the city

AE-1



and give a colorful and refreshing contrast to man's development"; "Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations"; "Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets."; as well as Objective 2 "Blocking, construction or other impairment of pleasing street views of the Bay or Ocean, distant hills, or other parts of the city can destroy an important characteristic of the unique setting and quality of the city."; and Objective 3 "Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city."; "Tall buildings on slopes of hills severely restrict views from above."; POLICY 1.1 "Recognize and protect major views in the city, with particular attention to those of open space and water; "POLICY 3.4 : "Promote building forms that will respect and improve the integrity of open spaces and other public area, and "New buildings should not block significant views of public open spaces, especially large parks and the Bay. Buildings near these open spaces should permit visual access, and in some cases physical access, to them."

AE-1, cont.

In order to comply with the NEPA and SF Planning Department Regulations, these building *must* be at, near, or below the street level of 23<sup>rd</sup> street. 40' and 50' foot buildings that tower above 23<sup>rd</sup> St and the Potrero Hill Rec Center are not reasonable in this location, as they deprive the public of open space and awe-inspiring natural vistas of the San Francisco Bay and San Bruno Mountains and replace these views with views from private apartments. Views like this form the unique core of San Francisco, and sacrificing that public view for private profit by buildings tall private market rate apartments of that height is irresponsible and unacceptable.

Accordingly, on the basis of the impact on Viewpoint 2 and nearby locations, I would urge the EIR/EIS to read "**significant impact**" in section 5.3, and for Hope SF to reconsider the plans so as to mitigate this impact.

*Other Viewpoints*

Similar to Viewpoint 2, the photographs taken from Viewpoint 3 and Viewpoint 4 are set well back from the actual view so as to avoid revealing the true impact on the public street view. Since the street is flat, standing back leads to a poor view. In truth, the views from the corner of 23<sup>rd</sup> and Wisconsin are beautiful public view corridors of the San Francisco Bay. The east facing vista is a treasure for sun rises. The Proposed Project will **significantly** and **detrimentally** impact this view. Below are photos I took (I-J) from the southeast corner of 23<sup>rd</sup> and Wisconsin, a place where locals currently walk with frequency in order to enjoy the natural beauty that forms the core of our current community:

AE-2  
AE-3

Photo I (Facing east/southeast from the southeast corner of 23rd and Wisconsin, with the current housing in the midground and the Bay in the background):





AE-2, cont.  
AE-3, cont.

And below Photo J through the chain link fence from the same location:



AE-2, cont.  
AE-3, cont.

Below is Photo K from the Potrero Hill Rec Center on the west side of the baseball field looking south along Arkansas (the baseball field is immediately to the left on the other side of the fence).



AE-2, cont.  
AE-3, cont.

Below is Photo L facing southeast from Wisconsin street on the west side of the Rec Center. The baseball field is in the foreground and the San Bruno Mountains in the background. The Proposed Project will obstruct views from throughout the baseball field Rec Center if it is built more than 10-15' feet above the current level of 23<sup>rd</sup> street.



AE-2, cont.  
AE-3, cont.

Finally, as mentioned above, the EIR/EIS report chose 9 strategic viewpoints. Unfortunately, these viewpoints are not actually representative of the views that will be affected by the Proposed Project. From the public open street of 23<sup>rd</sup> St., which was not included in the report, I took the photographs below (M-N) facing southeast and southwest:

AE-2



AE-2, cont.



AE-2, cont.

Below is the same view (O-P) southeast then southwest through the chain link fence on the south side of 23<sup>rd</sup> St. I took this with a phone and it did not come out well, but in person the view appears more like the photographs above. You can see the current housing below street level in the foreground, and the San Bruno Mountain the background, with the Bay all the way to the left





AE-2, cont.



AE-2, cont.

These street level views seen above from the public space of 23<sup>rd</sup> St. forms a central point of our community. The views make 23<sup>rd</sup> St. a popular pedestrian thoroughfare, which could increase significantly in usage if the greenway connecting 23<sup>rd</sup> to 25<sup>th</sup> St. through the Proposed Project is completed as designed.

Here are views (O) from the east side of the Potrero Rec Center on the footpath looking east:





AE-2, cont.

Here are the views from the east side of the Rec Center on Wisconsin near the bleachers of the baseball field looking east (P). The report did not include an assessment of whether views from these public spaces will be blocked. Given the importance of these views to the neighborhood, it is important to properly evaluate the environmental impact.



AE-2, cont.

The aesthetics of the street, and as a corollary of the neighborhood, will be completely and irreversibly marred if buildings J-L are constructed at the currently proposed height. The EIS/EIR needs to revise its section on Views/Aesthetics as required by NEPA given this evidence. It will also need to justify the infringement on the goals of the SF Planning Department.

In summary, the Proposed Project with building upwards of 40-50' at sites J-M has **significant impacts** "related to the character or scale of the existing physical environment and the aesthetic appeal of the surrounding area." This was not captured at all in the EIS/EIR and need to be addressed. Indeed, these impacts cannot be mitigated as the project is currently proposed.

In order to adequately address these impacts, I propose three options that all keep buildings J-L (and possibly M) no more than 10-15 feet above street level and therefore preserve the views:

1. **Build shorter buildings at J-M.** This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
2. **Build shorter building at J-M but build taller buildings further down the hill** (eg Building A-H and X). This will allow the same number of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at '65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the

AE-3

neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents *and* future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco

3. **Build the same height buildings but start at a lower height (do not terraform the land and add fill to bring up the height of the south side of 23<sup>rd</sup> st).** This will also not impact views from 23<sup>rd</sup> st or the Potrero Hill Rec Center open spaces.

AE-3, cont.

In addition, the EIS/EIR needs to address how the views on the east side of the Potrero Hill Rec Center will be affected by this development, as again these public views are a treasured aspect of our neighborhood and are protected under NEPA and the goals of the SF Planning Department and the city of SF.

#### **Alternative 1 (Reduced Development Alternative)**

Unfortunately, the heights of the buildings in Alternative 1 are not provided, so I cannot accurately judge the impact of this proposal. However, in general the same points stated above would apply to Alternative 1 if the buildings rise more than 10 -15 feet above street level.

AL-1

#### **SECTION II – Shadow on public areas**

The Proposed Project plans to construct very tall buildings that tower above the current street level. The EIS/EIR report did not take into consideration the shadow that these buildings will cast on the footpath that surround the Rec Center, which is well-used, or the pedestrian thoroughfare of 23<sup>rd</sup> st. The specific sections of the EIS/EIR that deals with shadow is **Section 5.11: Wind and Shadow**, and specifically how the Proposed Project deals with Proposition K – The Sunlight Ordinance, which prohibits “ any structure that would cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission.” Under CEQA, the report concludes that “the Proposed Project would not result in new shadows in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant).

The main misrepresentations in the EIS report are twofold: 1. that residents do not use the southern side of the Potrero Rec Center, and so the additional shadow cast by the taller building will not be significantly impactful; and 2. No mention of blocking the street sunlight of 23<sup>rd</sup> street. The south end of the Rec Center is frequently used and is an important part of the open space at the heart of our community. Resident exercise there, both by running around the perimeter of the baseball field as well as around the foot path found exterior to the chain link fence. As a result of the inaccuracy in the report regarding use of the Rec Center, a revised report should conclude that due to the height of the building, there *will* be a significant impact on the shadow on our public space.

LU-2  
WS-1  
WS-2

In addition, the report fails to take into account the significant and detrimental effect that the shadow from the tall buildings south of 23<sup>rd</sup> st will have on the pedestrians using that street. As mentioned above, the views from street level on 23<sup>rd</sup> st are exceptional, and pedestrians frequently use the south side to enjoy them, and also to congregate. The shadows will impact this public street/open place and make the street less friendly for pedestrian passage. This is directly in opposition to the goal of the SF Planning Department listed below.

General Plan: POLICY 3.1.3 “Relate the prevailing heights of buildings to street and alley width throughout the plan area... A core goal of the height districts is to create an urban form that will be intimate for the pedestrian” ; POLICY 4.6.1 – “Use established street design standards and guidelines to make the pedestrian environment safer and more comfortable for walk trips.”;

Nor is the Proposed Project as currently configured in line with SF planning’s stated Rec and Open Space Plan (see [http://www.sf-planning.org/ftp/General\\_Plan/13\\_Rec\\_and\\_Open\\_Space.htm](http://www.sf-planning.org/ftp/General_Plan/13_Rec_and_Open_Space.htm)): POLICY 2.3 – “Preserve sunlight in public open spaces.”

Finally, the proposed Project goes against SF Planning’s general plan for urban design ([http://www.sf-planning.org/ftp/General\\_Plan/15\\_Urban\\_Design.htm](http://www.sf-planning.org/ftp/General_Plan/15_Urban_Design.htm)), which includes OBJECTIVE 3: “Plazas or parks located in the shadows cast by large buildings are unpleasant for the user.”

Of note, the comments above focused on the Rec Center and 23<sup>rd</sup> St will likely not be applicable if people stop using these areas due to the obstruction of the views. Accordingly, the Shadow assessment and the View assessment should be assessed together as they both relate to proposed building height. Both shadow and view are significantly impacted by the height of the proposed buildings J-M as they tower above the current buildings. The Development as currently designed will impact Views/Aesthetics and Shadows, and as mentioned above will sacrifice public open spaces for private profit and views from private apartments.

It is the responsibility of the city and the developers to maintain our public spaces. Accordingly, I would implore Hope SF and Bridge Housing to reconsider the heights of these buildings J-M in order to preserve sunlight and views and avoid the **significant impact** that these buildings will have on the Shadow cast on our public spaces.

In order to adequately address these impacts, I propose three options that all keep buildings J-L (and possibly M) no more than 10-15 feet above street level and therefore preserve the views:

1. **Build shorter buildings at J-M.** This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
2. **Build shorter building at J-M** but build taller buildings further down the hill (eg Building A-H and X). This will allow the same degree of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at ‘65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents *and* future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco
3. **Build the same height buildings but start at a lower height (do not terraform the land and add fill to bring up the height of the south side of 23<sup>rd</sup> st).** This will also not impact views from 23<sup>rd</sup> st or the Potrero Hill Rec Center open spaces.

LU-2, cont.  
WS-1, cont.  
WS-2, cont.

### SECTION III – Buildings and population are too large for community

1700 units is a huge influx of population into this neighborhood. The EIR/EIS did not adequately address the environmental impact of this population (1100 additional units) on the traffic patterns. The specific sections of the EIS/EIR that deals with the treatment of buildings and population that are too large for the community are Impact C-TR-1(a) and C-TR-1(b), related to traffic patterns at intersections #1-4 (5.7.11).

The traffic assessment on this report was completed prior to 2010. In the last few years, the population of the San Francisco Bay Area has grown and traffic patterns have shifted. In particular, socioeconomic changes have resulted in increased residents commuting to the South Bay. Caltrain is running at capacity, and the major commute has reversed direction, such that residents *leave* SF in the morning. Accordingly, the traffic predictions of this report are likely out of date and inaccurate. In particular, the entrance and exit ramp of 280 from Pennsylvania can be back up significantly during rush hour, and it can be difficult to turn on to Pennsylvania from 25<sup>th</sup> st. Furthermore, the projections contained in this report described the majority of commuters as within San Francisco. This is no longer the case in 2015. The shift will be even more drastic with residents of market-rate apartments, such as those in the Proposed Project. That majority of these residents will be gainfully employed in order to afford these apartments, and many of them will commute to the South Bay on 280, 101, or Caltrain. Caltrain is packed going south at peak hour currently, and this is without the ongoing development of the Dogpatch. The EIS/EIR report woefully fails to account for shifting demographic (they report 10% commute to the South Bay, but this will not be the base for market rate apartments). They also fail to account for the future development of the Dogpatch and other areas that are further stressing the 22<sup>nd</sup> street Caltrain stop and the entrances and exits onto 280.

TR-3

Without an ability to mitigate traffic, Hope SF must be required to pursue a Reduced Development Plan, which would have less of an impact on traffic. Notably, the effect of lower density on traffic was not detailed extensively in the report (they grade the impact between the main plan and Alternative 1 as similar). Any development should add to the general well-being of the community by including some provisions for alleviating traffic and public transport congestion, rather than just adding to the financial burden and to public expenditures. If the Project Project does not including any provision for helping improve public transit usage and capacity and reducing congestion, it should not be as large.

AL-1

#### **Section IV - Inattention to community integration, open spaces, and responsible development**

##### **Planning Department**

Section 3.1 of the Hope SF Master Plan EIR/EIS claims that the Proposed Project is consistent with the SF Planning Department's General Plan for Potrero Hill/Showplace Square ([http://www.sf-planning.org/ftp/General\\_Plan/Showplace\\_Square\\_Potrero.htm](http://www.sf-planning.org/ftp/General_Plan/Showplace_Square_Potrero.htm)). However, on reviewing the plan, it is clear that the Proposed Project is at odds with numerous core tenants of the SF Planning Department's plans, including:

RE-1

- I. POLICY 3.1.2 - Development should respect the natural topography of Potrero Hill.
- II. POLICY 5.2.4 - Encourage publicly accessible open space as part of new residential and commercial development.
- III. POLICY 7.1.1 - Support the siting of new facilities to meet the needs of a growing community and to provide opportunities for residents of all age levels.

Nor is the Proposed Project as currently configured in line with SF planning’s stated Rec and Open Space Plan (see [http://www.sf-planning.org/ftp/General\\_Plan/I3\\_Rec\\_and\\_Open\\_Space.htm](http://www.sf-planning.org/ftp/General_Plan/I3_Rec_and_Open_Space.htm)):

- IV. POLICY 1.1 - Protect the natural character of regional open spaces and place high priority on acquiring open spaces noted for unique natural qualities.
- V. POLICY 2.2 - Preserve existing public open space – this includes a stipulation that “When public land becomes surplus to one public use, the General Plan states that it should be reexamined to determine what other uses would best serve public needs. The General Plan gives priority to direct public uses that meet either immediate or long-term public needs. One of these uses is open space. “
- VI. POLICY 2.3 - Preserve sunlight in public open spaces
- VII. POLICY 4.4 - Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.

RE-1, cont.

Finally the SF planning’s general plan for urban design ([http://www.sf-planning.org/ftp/General\\_Plan/I5\\_Urban\\_Design.htm](http://www.sf-planning.org/ftp/General_Plan/I5_Urban_Design.htm)) stipulates the following Objectives and Policies, which are not met by the Proposed Project:

- VIII. Objective 1, Policy 1.1:
  - a. “Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by **establishment of new viewpoints at key locations.**”
- IX. OBJECTIVE 3: MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.
  - a. Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city.
- X. POLICY 3.4 : Promote building forms that will respect and improve the integrity of open spaces and other public areas.

AE-1

**Section V: Issues related to community integration, open spaces, and responsible development**

Concerns about issues related to community integration, open spaces, and responsible development include:

- a. *The developers plan to import 77.810 CY of fill, much of which will be used to raise the land level up to 23<sup>rd</sup> st. The natural topography of the hill is there is steeply sloping; thus the Proposed Plan is in direct conflict with NEPA and CEQA – both of which call for the topography to be maintained. A solution to this conflict would be to start lower down the hill - in line with the natural topography of the hill. This would have the added benefit of preserving street level view corridors and views from the rec center as detailed below.*
- b. *I am very concerned that casting shadows on and blocking views from 23<sup>rd</sup> st. and the Potrero Hill rec center directly go against this. In addition, this can be mitigated so simply by building taller buildings further down away from the tallest part of the hill.*
- c. *There is no mentioned of creative open space designs to develop open space and capitalize on public views, not block the only ones we have now!*

AE-3

WS-2

PD-4



- d. *The developments adds a community and senior center but neglects to include and space for athletic activities such as a gym, pool, basketball court, or other. They plan on building the cheapest facilities possible to meet the requirements for public use space. This development should **add** to the community athletic facilities. They plan to add 1100 units to the existing Potrero Hill Rec Center usage without any additional athletic infrastructure. Furthermore, they plan to **detract** from the current existing infrastructure by **obstructing the view** and **casting shadows on the baseball field**. If they plan for their residents to use the existing Rec Center facilities, they should at least preserve the current open spaces and **decrease the height of the buildings bordering the Rec Center**. I would ask they support this Policy by **adding** facilities such as basketball or volleyball courts to the current development plan, possibly in the existing public land zoned P marked X, and certainly not detract from the wonderful and historic public use facility that is currently there.*

RE-1

Summary

In summary, the EIR/EIS report failed to adequately address the impact of the Proposed Project views/aesthetics, shadow, community integration and general congestion.

While I welcome Rebuild Potrero's plan to redevelop the south side of Potrero Hill. Importantly, I believe that this project can meet the city's housing needs and also responsibly attend to the preservation of the neighborhood and quality of life of the existing residents. However, the current Proposed Project fails to adequately preserve public open space and views and the EIR/EIS failed in its stated mission to accurately assess this impact. Accordingly, I believe that the Hope SF must redesign the Proposed Plan with a more neighborhood-friendly design that focuses on preserving the open space and views that form the heart and soul of San Francisco and Potrero Hill in particular. It is the responsibility of both the developers and the governmental regulatory agencies to ensure that private profit does not supersede public interests.

AE-3  
RE-1  
WS-1

I believe any of the following proposals would meet the city's housing needs, meet the needs of the current community residents, and also provide an aesthetically pleasing public park and street environment for enjoyment by existing residents and residents to come:

1. **Build shorter buildings at J-M.** This will decrease the total capacity of the Project, but these are compromises that need to be made in the course of development.
2. **Build shorter building at J-M but build taller buildings further down the hill** (eg Building A-H and X). This will allow the same degree of housing units. The buildings are farther down the hill and will not impact the best views at the peak. In addition, there buildings directly south of the proposed site are zoned at '65 feet already, so taller buildings will not have as big an impact as buildings at the top that are completely inconsistent with the size of buildings in the rest of the neighborhood. This option would allow the developers to maintain the same or nearly the same level of profit, the city to get the housing stock, and the current residents *and* future residents in the neighborhood to maintain the cherished iconic views that are at the heart of San Francisco
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AL-1

Finally, the EIS/EIR reads that NEPA requires that an EIS must: "[r]igorously explore and objectively evaluate all reasonable alternatives." Given this requirement, I request that Hope SF complete another EIS/EIR to evaluate an alternative in which the views from our public spaces at 23<sup>rd</sup> st. and the Potrero Recreation Center are not obstructed, and any assessed housing deficit is replaced with taller buildings further down the hill towards 25<sup>th</sup>.

AL-2

Thank you for your attention. Please do not hesitate to contact me with comments or questions at [Nathaniel.Robbins@ucsf.edu](mailto:Nathaniel.Robbins@ucsf.edu). I will look forward to your response and reconsideration of the Proposed Project as it currently stands.

GC-1

Sincerely,  
Dr. Nathaniel Robbins



**Schuett, Rachel (CPC)**

---

**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 1:42 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Potrero Terrace and Annex redevelopment EIR

---

**Sarah Bernstein Jones**  
**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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** Christopher Sabre [<mailto:csabre@mac.com>]  
**Sent:** Monday, January 05, 2015 11:54 AM  
**To:** Jones, Sarah (CPC)  
**Subject:** Potrero Terrace and Annex redevelopment EIR

2012 23<sup>rd</sup> Street

Sa Francisco, CA 94107

415.842.2013

[csabre@mac.com](mailto:csabre@mac.com)

Sarah Jones, Environmental Review Officer

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Re: Potrero Terrace and Potrero Annex Public Housing sites EIR

Dear Ms. Jones:

The proposed development is too dense and too high, obliterating existing views and increasing traffic congestion beyond tolerable levels.

AE-3  
PD-1  
TR-3

As currently designed, the proposed project would have a destructive impact on the surrounding neighborhood. Because Potrero Hill is shouldering two existing freeways, US 101 and I 280, there is limited access to the neighborhood from east or west directions. Existing streets such as 23<sup>rd</sup> and 17<sup>th</sup> Street are currently taxed to the maximum with traffic and cannot be re-engineered to meet increased demand.

TR-3

This proposed project more than doubles the size of the existing population with block-like, unaesthetic buildings designed only to maximize density. The proposed grid pattern with thoroughfares would create blind intersections throughout the development, contributing to unsafe conditions.

TR-8

As longtime neighbors, we attended early meetings that proposed 1200 units to replace existing 650 units. Later, developers proposed 1700 units and then said that they would reduce the number to 1600. Such tactics are disingenuous and deceitful.

GC-1

We ask that you consider the concerns we have raised about safety and the crushing effect of excessive density in our Potrero Hill neighborhood. We are not opposed to progress. We are only opposed to blind progress.

PD-1  
TR-8

Sincerely,

Christopher Sabre and Jean Loura

2012 23<sup>rd</sup> Street  
Sa Francisco, CA 94107

415.842.2013

[csabre@mac.com](mailto:csabre@mac.com)

RECEIVED  
JAN 07 2017  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

Sarah Jones, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

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GC-1

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PD-1  
TR-8

Sincerely,

  
Christopher Sabre and Jean Loura



Dear Sarah Jones,

I have been a resident of Potrero Terrace for over 30 years. I know HUD wants to redevelop all of the southeastern sector of public housing in San Francisco and have a few questions.

We were told we had the right to move back into the new units. We also have the right to vote but there are prerequisites - have to be 18 years old, a U.S. citizen, etc. So what are the prerequisites, criteria and stipulations to move back into the new residences?

Will there be wash machine and dryer hook-ups? Some of the new developments didn't have wash machine hook-ups because they didn't account for the square footage when being built.

How are parking spaces going to be incorporated into the plan - garage, on the street? What about garbage pick up? Will that be privatized or

GC-1

SE-2

GC-2

TR-6

UT-8

still the city pick up.

UT-8, cont.

Also, what happens to all the children attending this districts schools? Will they have to be relocated to other districts? The schools receive funding for these children so does that mean the schools lose out too?

PS-2

Time and again I've seen HUD try to rebuild and establish new residences for low income and fixed income people only to have these people turned away because they can't afford the new and improved home - just saying.

GC-3

Thankyou.

Yours truly,  
Marlene Schurnghammer

P.S. Wife is free in this area. Will that remain once redeveloped?

GC-2



**Sarah Jones**  
**Environmental Review Officer - Potrero Hill Master Plan EIR**  
**San Francisco Planning Department**  
**1650 Mission Street, Suite 400**  
**San Francisco, CA 94103**

**December 3, 2014**

RE: Rebuild Potrero – Comments relating to the DEIR/DEIS

Dear Ms. Jones,

As a homeowner, from the Parkview Heights development, on Potrero Hill adjacent to the proposed rebuild I strongly desire a successful outcome. This is a once in a lifetime opportunity for all of Potrero Hill and San Francisco to gain a thoughtfully well - designed, sunny, vibrant, model neighborhood.

GC-1

As a lucky homeowner in San Francisco, who has lived on the South Side of Potrero Hill for almost 18 years, I have personally received the benefits of home ownership and the positive effect that has on an entire community. Often families, who own or have the opportunity to own a home, generally take care of and are invested in the quality of life and safety in their neighborhood. Given that the whole United States and particularly the San Francisco Bay Area, have experienced a hollowing out of the middle class, "US 2010 discover America in a New Century". 1 I strongly believe that for the development to become a thriving environment for families of all kinds, each area of the development should offer a mix of affordable housing and ownership opportunities (i.e. rent to own), so that people of **ALL** income levels can be engaged stewards of their new community. Why shouldn't, Rebuild Potrero be the most integrated new project in SF populated by a diversity of income levels and maximized ownership woven throughout the entire project. For example, The Mosaica Family and Senior Apartments at Alabama and Florida have achieved a balanced thriving community of mixed income residential, and commercial in one square block "*The one-square-block site incorporates 93 units of housing for low-income families, 24 units for low-income seniors, 34 homeownership units, 11,000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment.*"<sup>2</sup>

SE-3

**Again, I support the inclusion of middle - income families to the new housing mix**, which includes folks (I believe) with incomes from 84,000 – 140,000\$

SE-3

per year and/or increase the moderate number of units to 210 units at 150% of median. I encourage the project planners to include workforce housing for teachers, firefighters, peace officers, librarians etc. as a segment of the middle class portion of the total 1,800 units. Currently, San Francisco political rhetoric touts efforts to create affordable housing for our civil work force and middle class, and this project is positioned to provide some of those badly needed housing units.

SE-3, cont.

Finally, safety and security must remain a top priority until the area is deemed to be free of the high levels of criminal activity that currently exist. I support maintaining the SFPD Substation in the new development and introducing a non-profit, such as Nadine Burke Harris' Center for Youth Wellness, which has created programs to overcoming trauma that the community of the Annex - Terrace has certainly suffered. In order to enhance the security and economic diversity of the new neighborhood, I strongly encourage increasing of the commercial square footage to 50,000 Square Feet from 15,000 Square Feet. I believe that the increase of commercial use space, will add needed vibrancy and pedestrians to the streets to inhibit criminal behavior, which can only elevate the overall quality of life. Not to mention, that the neighborhood could become less car reliant, provide jobs, and thereby be much more sustainable. It might even become a destination for residents from other parts of the city as well. One last thing, please keep most of the views from the Potrero Hill Recreation Center.

PS-1

PD-3

AE-3

Many aspects of the project are environmentally ambitious and commendable, for example the buildings will meet a high LEED certification. The project planners should maximize the solar and green roof potential of the site, to be a solar/green roof model for the rest of the city. I am very excited about the stitching back together of the street grids and the addition of the parks, I believe this will allow for the area to finally be physically integrated into the existing street grid pattern and allow for increased pedestrian and recreational activities.

ME-1

TR-7

I participated in many of the design workshops with many other people, and I am truly impressed by the work the Potrero Hill community achieved to get this far in the process. With a little more thought and action on the demographic composition and an

GC-1



increased proportion of ownership of the project units, I believe the potential for this new community to be exceptionally positive for all.

GC-1, cont.

Best,

Jennifer Serwer

Thomas Drechsler *Thomas Drechsler*  
Residents at 86 Caire Terrace

1. *"US 2010 discover America in a New Century Growth in the Residential Segregation of Families by Income, 1970-2009."* A large body of research suggests that the neighborhood context one lives in can directly affect that person's social, economic, or physical outcomes (and a large range of sociological theories predict such contextual effects; see, for example, Burdick-Will et al., 2011; Jencks & Mayer, 1990; Leventhal & Brooks-Gunn, 2000; Sampson, Raudenbush, & Earls, 1997). For instance, living in a severely disadvantaged neighborhood context is associated with a loss in learning equivalent to a full year of school among black children (Sampson, Sharkey, & Raudenbush, 2008) and lowers high school graduation rates by as much as 20 percentage points (Wodtke, Harding, & Elwert, 2011). Moreover, neighborhood violent crime rates as well as the prevalence of neighborhood associations are robust predictors of birth weight, an important health outcome among infants (Morenoff 2003). This suggests that income segregation will lead to more unequal outcomes between low- and high-income households than their differences in income alone would predict because households are also influenced by the incomes of others in their community.

2. [www.tndc.org/property/mosaica-florida-alabama-street](http://www.tndc.org/property/mosaica-florida-alabama-street)

*The Mosaica Family and Senior Apartments realize the full potential of mixed-use, mixed-income design principles. Mosaica became TNDC's first property in the Mission District in November 2009, when TNDC took over management of the project from the Citizens Housing Corporation. The one-square-block site incorporates 93 units of housing for low-income families, 24 units for low-income seniors, 34 homeownership units, 11,000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment. Mixed-use developments strive to build community by creating safe, communal spaces for residents to enjoy, and on a typical afternoon, the Mosaica courtyard is a vibrant scene of children playing while parents and neighbors look on. The project's commercial spaces support local entrepreneurs and are a nod to the Northeast Mission District's history as a center of light industry. This seamless weaving of housing for low- and middle-income people with places of work and recreation have earned Mosaica a Gold Nugget Grand Award for "Best Affordable Project" and made it a Finalist for Affordable Housing Finance Magazine's Readers' Choice Awards in the "Master-Planned/Mixed-Use" category.*



Sarah Jones  
 Environmental Review Officer - Potrero Hill Master Plan EIR  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

December 3, 2014

RE: Rebuild Potrero – Comments relating to the DEIR/DEIS

Dear Ms. Jones,

As a homeowner, from the Parkview Heights development, on Potrero Hill adjacent to the proposed rebuild I strongly desire a successful outcome. This is a once in a lifetime opportunity for all of Potrero Hill and San Francisco to gain a thoughtfully well - designed, sunny, vibrant, model neighborhood.

GC-1

As a lucky homeowner in San Francisco, who has lived on the South Side of Potrero Hill for almost 18 years, I have personally received the benefits of home ownership and the positive effect that has on an entire community. Often families, who own or have the opportunity to own a home, generally take care of and are invested in the quality of life and safety in their neighborhood. Given that the whole United States and particularly the San Francisco Bay Area, have experienced a hollowing out of the middle class, "US 2010 discover America in a New Century". 1 I strongly believe that for the development to become a thriving environment for families of all kinds, each area of the development should offer a mix of affordable housing and ownership opportunities (i.e. rent to own), so that people of **ALL** income levels can be engaged stewards of their new community. Why shouldn't, Rebuild Potrero be the most integrated new project in SF populated by a diversity of income levels and maximized ownership woven throughout the entire project. For example, The Mosaica Family and Senior Apartments at Alabama and Florida have achieved a balanced thriving community of mixed income residential, and commercial in one square block *"The one-square-block site incorporates 93 units of housing for low-income families, 24 units for low-income seniors, 34 homeownership units, 11,000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment."*2

SE-3

**Again, I support the inclusion of middle - income families to the new housing mix**, which includes folks (I believe) with incomes from 84,000 – 140,000\$

SE-3

per year and/or increase the moderate number of units to 210 units at 150% of median. I encourage the project planners to include workforce housing for teachers, firefighters, peace officers, librarians etc. as a segment of the middle class portion of the total 1,800 units. Currently, San Francisco political rhetoric touts efforts to create affordable housing for our civil work force and middle class, and this project is positioned to provide some of those badly needed housing units.

SE-3, cont.

Finally, safety and security must remain a top priority until the area is deemed to be free of the high levels of criminal activity that currently exist. I support maintaining the SFPD Substation in the new development and introducing a non-profit, such as Nadine Burke Harris' Center for Youth Wellness, which has created programs to overcoming trauma that the community of the Annex - Terrace has certainly suffered. In order to enhance the security and economic diversity of the new neighborhood, I strongly encourage increasing of the commercial square footage to 50,000 Square Feet from 15,000 Square Feet. I believe that the increase of commercial use space, will add needed vibrancy and pedestrians to the streets to inhibit criminal behavior, which can only elevate the overall quality of life. Not to mention, that the neighborhood could become less car reliant, provide jobs, and thereby be much more sustainable. It might even become a destination for residents from other parts of the city as well. One last thing, please keep most of the views from the Potrero Hill Recreation Center.

PS-1

PD-3

AE-3

Many aspects of the project are environmentally ambitious and commendable, for example the buildings will meet a high LEED certification. The project planners should maximize the solar and green roof potential of the site, to be a solar/green roof model for the rest of the city. I am very excited about the stitching back together of the street grids and the addition of the parks, I believe this will allow for the area to finally be physically integrated into the existing street grid pattern and allow for increased pedestrian and recreational activities.

ME-1

TR-7

I participated in many of the design workshops with many other people, and I am truly impressed by the work the Potrero Hill community achieved to get this far in the process. With a little more thought and action on the demographic composition and an

GC-1

increased proportion of ownership of the project units, I believe the potential for this new community to be exceptionally positive for all.

GC-1, cont.

Best,

Jennifer Serwer

Thomas Drechsler *Thomas Drechsler*  
Residents at 86 Caire Terrace

1. *"US 2010 discover America in a New Century Growth in the Residential Segregation of Families by Income, 1970-2009."* A large body of research suggests that the neighborhood context one lives in can directly affect that person's social, economic, or physical outcomes (and a large range of sociological theories predict such contextual effects; see, for example, *Burdick-Will et al., 2011; Jencks & Mayer, 1990; Leventhal & Brooks-Gunn, 2000; Sampson, Raudenbush, & Earls, 1997*). For instance, living in a severely disadvantaged neighborhood context is associated with a loss in learning equivalent to a full year of school among black children (*Sampson, Sharkey, & Raudenbush, 2008*) and lowers high school graduation rates by as much as 20 percentage points (*Wodtke, Harding, & Elwert, 2011*). Moreover, neighborhood violent crime rates as well as the prevalence of neighborhood associations are robust predictors of birth weight, an important health outcome among infants (*Morenoff 2003*). This suggests that income segregation will lead to more unequal outcomes between low- and high-income households than their differences in income alone would predict because households are also influenced by the incomes of others in their community.

2. [www.tndc.org/property/mosaica-florida-alabama-street](http://www.tndc.org/property/mosaica-florida-alabama-street)

*The Mosaica Family and Senior Apartments realize the full potential of mixed-use, mixed-income design principles. Mosaica became TNDC's first property in the Mission District in November 2009, when TNDC took over management of the project from the Citizens Housing Corporation. The one-square-block site incorporates 93 units of housing for low-income families, 24 units for low-income seniors, 34 homeownership units, 11,000 square feet of resident services and commercial space, and a private courtyard with green space and playground equipment. Mixed-use developments strive to build community by creating safe, communal spaces for residents to enjoy, and on a typical afternoon, the Mosaica courtyard is a vibrant scene of children playing while parents and neighbors look on. The project's commercial spaces support local entrepreneurs and are a nod to the Northeast Mission District's history as a center of light industry. This seamless weaving of housing for low- and middle-income people with places of work and recreation have earned Mosaica a Gold Nugget Grand Award for "Best Affordable Project" and made it a Finalist for Affordable Housing Finance Magazine's Readers' Choice Awards in the "Master-Planned/Mixed-Use" category.*



Thomas Shaw  
 1648 Revere Av.  
 San Francisco, CA 94124

December 27, 2014,

San Francisco Planning Department :  
 Attn. Rachel Schuett  
 1650 Mission Street - 4th Floor  
 San Francisco, CA 94103  
 Ph. (415) 575-9030

Dear, Rachel Schuett,

I am attempting to contact you. I called the above phone number and had to wait on a call back. I have no message phone to leave an answer to at this time. Therefore I am writing you this letter.

My anticipation ~~to~~ communicate with you concerns the Draft Environmental Impact Report (EIR) / Environmental Impact Statement (EIS) for the Potrero Hope SF Master Plan Project. There was a Public Notice issued for the December 11, 2014 Public Hearing on the adequacy and accuracy of this document. The Public Notice mentioned that if you wanted more information contact Rachel Schuett.

Therefore I would like to be placed on your mailing list pertaining to this document (EIR/EIS). I would like to receive more NOTICES concerning it. Most

(continued)



(2)

important I would like to receive a document titled "Response to Comments" which will contain all relevant comments on the Draft (EIR/EIS) that took place at the Hearing.

These comments came out at the Public Hearing on December 11, 2014. I went to testify at the Public Hearing, and did do so. The document the Draft (EIR/EIS) said that those who testify at the Hearing on the Draft (EIR/EIS) will automatically receive a copy of "Responses to Comments" document. Along with it they would receive the date reserved for certification of the Draft (EIR/EIS).

Thus I would like to receive more Notices and the document "Responses to Comments".

GC-1, cont.

Sincerely yours,

Thomas Shaw



**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 1:40 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Potrero Hope

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**Sarah Bernstein Jones**  
**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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** Carol Sundell [<mailto:casundell@yahoo.com>]  
**Sent:** Monday, January 05, 2015 1:10 PM  
**To:** Jones, Sarah (CPC)  
**Subject:** Potrero Hope

Please, please consider alternate 1. This is way too dense for our neighborhood. I support the new development....not the 60 foot heights or the density. Have lived on the hill over 40 years. Please consider the character of the neighborhood.  
Sincerely,  
Carol Sundell  
771 Wisconsin St.

AL-1



**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Wednesday, January 07, 2015 12:09 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** FW: Comments on Potrero HopeSF Draft EIR

Sarah Bernstein Jones  
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: 415-575-9034 | Fax: 415-558-6409  
Email: [sarah.b.jones@sfgov.org](mailto:sarah.b.jones@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)

**From:** Suling Wang [<mailto:suling@sulingwang.com>]  
**Sent:** Wednesday, January 07, 2015 11:10 AM  
**To:** Jones, Sarah (CPC)  
**Subject:** Comments on Potrero HopeSF Draft EIR

Date: 1/6/15

TO:  
Sarah B. Jones  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street  
Suite 400  
San Francisco, CA 94103

Dear Ms. Jones:

I hope you are doing well. I would like to comment on the Draft EIR for Potrero Hope SF. Will you please respond to let me know you received my comments?

GC-1

My concerns about the development are pretty specific and relate to the health risks associated with the construction activities. My 2 children attend Starr King Elementary School - which is located right across the street from the proposed development. Ever since I heard about this development it has worried me that my kids will have greater exposure to lead, asbestos or other toxic substances due to this construction.

AQ-2  
HZ-2

I appreciate that the EIR lists the measures to control dust and toxic emissions that are required by law, but I still have concerns about how these measures and the dust control plan will be enforced. I would feel a lot more comfortable if there is more detail about how the various safeguards to public health that are described in the EIR will be enforced and who will enforce them. As the consequences of not following the plans can be very serious, there should be a detailed plan for enforcement laid out in anticipation of things possibly going wrong rather than after the fact.

HZ-3

These are my questions:

1. Will the BAAQMD require air monitors specifically for asbestos? Where would the monitors be located?
2. Can the particulate monitoring results and asbestos monitoring results be posted on a website so they are easily viewed by the public? This way the community does not have to constantly chase down people in the building dept, BAAQMD or public health dept to find out the results.
3. How quickly are air monitoring results returned and interpreted? Is it possible to get real-time readings of the the air quality? If there is a significant delay in interpreting the results and a bad result is obtained. The harm is already done.
4. Who is the person that will be responsible for making sure that all the measures contained in the Dust Control Plan will actually be implemented everyday for the 10+ years duration of this construction project? Will this person be experienced and have expertise in construction and dust control methods? Will this person have the authority to stop construction activities should the activities approach hazardous levels of toxins to public health? Who will have the authority to stop construction activities if the dust control plan or other measures are not being adequately followed?
5. If there will be inspections of the construction site by an independent 3rd party, how often will they be? Who would this 3rd party be and what would be their level of expertise in public health or construction activities? If they are hired and paid for by the developer, would that not be a conflict of interest?
6. What will be the role and requirements of the building inspector, air management inspector and public health dept during the construction?

HZ-3, cont.

I understand that nobody involved in the construction intends any harm to public health. But this is the reasoning for my worries. I read about serious problems with construction activities relating to naturally occurring asbestos in the soil that occurred at the Hunter’s Point Shipyard construction activities a few years ago. The asbestos monitoring equipment wasn’t working properly and nobody noticed for months. The developer on many occasions went over the shut-down limit for asbestos in the air and did not shut-down construction activities. The Department of Public Health issued notice of violations to the developer. There were laws in place and there was a dust control plan, but this did not prevent harm to the community. As a result of these mistakes, people in the community were exposed to higher than legal amounts of asbestos dust for several months and are now left wondering for the rest of their lives if there is going to be any long term effect on their health or the health of their kids. Are there any assurances that the same mistakes won’t happen again at the Potrero development?

Generally I don’t worry about every construction site I pass by, but the Potrero development is exceptional, because it is going to go on for years and the potential for serious long-term health risks is great. The development is so huge and it is on top of serpentine rock - which contains naturally occurring asbestos. The asbestos in the rock and soil will be disturbed and released into the air during grading and removal. The dust control measures sound complicated and laborious. It seems like it would be easy to not follow all of them everyday for 10+ years unless there is a lot of oversight.

The potential exposure from this and other construction activities and toxins to the surrounding community is significant and for some children in the neighborhood the construction activities will last the greater part of their childhood, which is a time when exposure to such toxins has a greater and more serious effects on long term health than it would on adults in the form of respiratory illnesses and increased risk of cancer.

AQ-2

I have been studying the Draft EIR and focusing on the sections relating to air quality and hazards during construction. It seems that by law there are many mitigation measures that will be required by various agencies that are meant to reduce the health hazard to “Less than Significant” for many -but not all- health hazards. In the back of my head, I worry that “Less than Significant” is still not the same as zero. Some negative health impact on the community and my kids is unavoidable.

While it does make me feel better to see that there are laws in place to protect people from these health hazards, mistakes can be made and sometimes the rules aren’t followed. It is not enough to just have the plan and just have laws. In this situation, the negative consequences can be long term and serious. With such a large project it can be very confusing who is in charge or responsible for what and very hard for people to know what is really going on at the

HZ-3

construction site. For these reasons, I ask that the plan for enforcement of mitigation measures to be very thought out, detailed and made easily understood and accessible to the community. | HZ-3, cont.

Thanks for taking the time to consider my concerns,  
Suling Wang  
Parent at Starr King Elementary School



**Schuett, Rachel (CPC)**

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**From:** Jones, Sarah (CPC)  
**Sent:** Monday, January 05, 2015 3:31 PM  
**To:** Schuett, Rachel (CPC)  
**Subject:** Fwd: Potrero Public Housing

Sent from my iPhone

Begin forwarded message:

**From:** Terry Zwigoff <[pm12400@aol.com](mailto:pm12400@aol.com)>  
**Date:** January 5, 2015 at 3:23:31 PM PST  
**To:** [Sarah.B.Jones@sfgov.org](mailto:Sarah.B.Jones@sfgov.org)  
**Subject:** Potrero Public Housing

Hi -

I would urge you to keep the height of this project within the 40' norm.  
Thanks for your consideration,  
Terry Zwigoff, San Francisco

| AL-1





ATTACHMENT B **Draft EIR/EIS Public Hearing  
Transcript**



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**SAN FRANCISCO PLANNING COMMISSION**

**THURSDAY, DECEMBER 11, 2014**

**Pages 1 - 39**

**POTRERO HOPE SF PROJECT DRAFT EIR/EIS  
PUBLIC HEARING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT**

**CITY HALL, ROOM 400  
1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102**

**REPORTED BY KELLY POLVI, RMR, FCRR  
CALIFORNIA CSR NO. 6389**

-----

**JAN BROWN & ASSOCIATES  
WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES  
701 BATTERY STREET, 3RD FLOOR, SAN FRANCISCO, CA 94111  
(415) 981-3498 OR (800) 522-7096**

1                   MEETING OPENED AT 12:10 P.M., DECEMBER 11, 2014

2                   ---000---

3                   COMMISSION SECRETARY: Good afternoon, and welcome to the  
4 San Francisco Planning Commission regular hearing for Thursday  
5 December 11th, 2014.

6                   I'd just like to remind members of the audience the  
7 commission does not tolerate any disruption or outbursts of any  
8 kind. Please silence any mobile devices that may sound off  
9 during these proceedings and, when speaking before the  
10 commission, if you care to, please state your name for the  
11 record.

12                   I'd like to take roll at this time.

13                   (Whereupon, the initial proceedings were not reported or  
14 transcribed.)

15 REGULAR CALENDAR ITEM F. 9:

16                   (Whereupon, the proceedings commenced at 12:23 P.M.)

17                   COMMISSION SECRETARY: Excellent.

18                   Commissioners, that will place you under your regular  
19 calendar for Item 9, Case No. 2010.0515E. This is the Potrero  
20 Hope SF Project Draft EIR and EIS.

21                   Please note that written comments will be accepted at the  
22 planning department until 5:00 P.M. on January 5th, 2015.

23                   I actually do have several speaker cards.

24                   PRESIDENT WU: Okay.

25                   MS. SCHUETT: Thank you, Commission Secretary. Good

1 afternoon, President Wu, members of the commission. Rachel  
2 Schuett, planning department staff.

3 The item before you is the public hearing to receive  
4 comments on the Draft Environmental Impact Report and  
5 Environmental Impact Statement or EIR/EIS for the Potrero Hope  
6 SF Project. This is a joint CEQA/NEPA document prepared by the  
7 planning department and the Mayor's Office of Housing and  
8 Community Development.

9 Again, Case No. 2010.05 -- 0515 E.

10 I'm joined here today by my colleagues, Sarah Jones,  
11 Environmental Review Officer, also Eugene Flannery from the  
12 Mayor's Office of Housing and Community Development.

13 Members of the project sponsor team are also present.

14 The project site is located on the south slope of  
15 Potrero Hill between US Highway 101 and 280.

16 The site is generally bounded by Connecticut Street, 26th  
17 Street, Wisconsin Street, 23rd Street, Texas Street, and 25th  
18 Street.

19 The project sites within the Potrero Hill neighborhood  
20 and the southeast quadrant of the city and is currently  
21 developed with 620 public housing units and two public housing  
22 developments, the Potrero Terrace and the Potrero Annex.

23 The proposed project would include demolition of the  
24 existing 620 public housing units and development of up to  
25 1,700 residential units for a range of income levels, which

1 includes replacement of public housing units.

2 The project also includes new vehicle and pedestrian  
3 connections, new street and block layout, new transit stops,  
4 new water, waste water, and storm water infrastructure, and new  
5 retail uses, community facilities, and open space.

6 Construction of the proposed project would occur over  
7 approximately 10 years in three non-overlapping phases.

8 It should be noted that the majority of the impacts  
9 identified in the draft EIR/EIS are, in fact, temporary impacts  
10 related to this construction period.

11 Specifically, the draft EIR/EIS for the proposed project  
12 identified significant impacts related to construction-period  
13 aesthetic, socioeconomic, site circulation, noise and  
14 vibration, and air quality impacts, as well as impacts related  
15 to the accidental discovery of archeological, paleontological  
16 resources, as well as human remains.

17 Also, during the construction period the handling of  
18 hazardous building materials and also effects on migratory  
19 birds during construction.

20 Also, operational site circulation and geological effects  
21 due to the site topography were also identified.

22 However, mitigation measures were also identified to  
23 reduce these potentially-significant impacts to a  
24 less-than-significant level.

25 The draft EIR/EIS also identified significant impacts

1 related to transit capacity, delay at local intersections,  
2 exterior noise levels, construction-period criteria, air  
3 pollutants, and operational air quality.

4 Identified mitigation measures for these impacts would  
5 not reduce impacts to a less-than-significant level; therefore,  
6 these impacts would remain significant and unavoidable.

7 A hearing to receive the Historic Preservation  
8 Commission's comments on the draft EIR/EIS was held on December  
9 3rd, 2014. At the hearing, the HPC indicated that although no  
10 impact to historic resources would occur as a result of the  
11 proposed project, approval -- excuse me -- they would like to  
12 see the project sponsor make an effort to document the history  
13 of this site prior to demolition.

14 At this time I'd like to remind all speakers that this is  
15 not a hearing to consider approval or disapproval of the  
16 proposed project. Approval hearings will follow the final  
17 EIR/EIS certification. Your comments today should be confined  
18 to the adequacy and accuracy of information and analysis within  
19 the draft EIR/EIS.

20 The comments will be transcribed by the court reporter  
21 and responded to in the Responses to Comments document.

22 This document will respond to all verbal and written  
23 comments received and make revisions to the draft EIR/EIS as  
24 appropriate.

25 I would like to remind commenters to speak slowly and

1 clearly so that the court reporter can produce an adequate  
2 transcript of today's hearing. Also, commenters should state  
3 their name and address for the record so that they may be  
4 properly identified and so that we may send them a copy of the  
5 Responses to Comments document once it is completed.

6 After hearing comments from the general public, we will  
7 also take comments on the draft EIR/EIS from the planning  
8 commission.

9 I will note that the public review period for this draft  
10 EIR/EIS began on November 7th and will continue until 5:00 P.M.  
11 on January 7th, 2015. Comments that are not made verbally  
12 today should be submitted in writing to the planning  
13 department.

14 This concludes my presentation on this matter, and unless  
15 commissioners have questions, I would respectfully suggest that  
16 the public hearing on this item be opened.

17 PRESIDENT WU: Thank you. Okay. I'll call a number of  
18 names. The first person can come to the podium. If I call  
19 your name, please line up on the screen side of the room.

20 Patricia Hunting. Emily Weinstein. Maritza Aragon.  
21 Dadi Gudmundsson.

22 COMMISSION SECRETARY: President, I apologize. I should  
23 have mentioned this to you. We had a request for interpreters  
24 for this matter, and so if those persons seeking the need for  
25 Spanish and/or Chinese interpretation, if you could come



1 forward, we could accommodate that request now. I know that  
2 both interpreters are present. Are present.

3 If you're ready for Spanish interpretation?

4 No? Was that -- okay.

5 PRESIDENT WU: Thank you.

6 COMMISSION SECRETARY: You can use both mics.

7 THE INTERPRETER: Okay.

8 (Through the Spanish language interpreter.)

I-Aragón

9 MS. ARAGÓN: My name is Maritza Aragón. I'm a resident  
10 of Potrero Hill. I'm participating in the activities that are  
11 carried out there.

12 I feel better now, but sometimes I feel very stressed  
13 because of violent activity in that area.

14 My children are very afraid. We are hoping for a  
15 better -- we're hoping for changes in the new homes -- housing  
16 that will be built.

17 We're hoping there will be no more violence, that things  
18 will be different.

19 That's all.

20 PRESIDENT WU: Thank you.

21 Could we ask if there are additional Spanish speakers who  
22 need interpretation?

23 (No response.)

24 Okay. Thank you.

25 And then do we also have a group of people that need

GC-1

1 Chinese, Cantonese, or Mandarin interpretation?

2 COMMISSION SECRETARY: If our Chinese interpreter could  
3 approach. Thank you.

4 PRESIDENT WU: Thank you.

5 (Through the Chinese language interpreter.)

6 MS. ZEN: How are you doing?

7 PRESIDENT WU: Could you please speak into that  
8 microphone? Thank you. Yes.

I-Zen

GC-1 9 MS. ZEN: The reason why I'm here today is I hope to  
10 bring about improvement in our community and also improve the  
11 safety and then improve the living environment.

PD-4 12 And there are more extracurricular activities and space  
13 for recreation for the children.

PD-3 14 Oh, okay. And then there are more retail space and  
15 shops, so we can -- we can be out on the street and, you know,  
16 spend more time on the street and shop.

17 Because where we live, the reputation is not so good  
18 where -- in the neighborhood where we live.

GC-1 19 Oh. Oh. Oh. And then where we live people tend not to  
20 come and visit because of the area.

21 And I hope that there'll be some change to bring about.

22 That's all.

23 PRESIDENT WU: Thank you.

24 Sir, you're providing interpretation. If you could speak  
25 more loudly into the microphone, that would be helpful.

1 THE INTERPRETER: Certainly.

2 PRESIDENT WU: Thank you.

3 (Through the Chinese language interpreter.)

4 MR. ZHANG: Good morning.

I-Zhang

5 I'm happy to be here today at this community meeting.

6 I am sincere and hopeful that the -- the city  
7 (indiscernible) will rebuild the space or the neighborhood.

8 Currently, I reside on this side of Masonic [as spoken],  
9 708.

GC-1

10 Oh, okay. The housing in this neighborhood, it's over a  
11 hundred years old, and many of which is in disrepair and there  
12 are leaks.

13 Okay. And I sincerely hope that the city government --  
14 the city will rebuild this area and improve the neighborhood  
15 for the residents, community, and the children.

16 That's all I have to say today. Thank you.

17 PRESIDENT WU: Thank you.

18 And I believe one more person?

19 One more time, sir, could I ask you to just speak into  
20 the microphone because the interpreter --

21 THE INTERPRETER: Okay.

22 PRESIDENT WU: -- the recorder is having a hard time  
23 hearing.

24 (Through the Chinese language interpreter.)

I-Kwan

GC-1

25 MR. KWAN: Good afternoon. I reside in this area.

I-Kwan, continued

1 According to the information I got, currently there are 606  
2 living units in our area, and according to the plan, there can  
3 be 1,600 units to be constructed.

4 And also would like to feed back that our mayor has  
5 30,000 units planned in the future, so just want -- I think  
6 this is a great plan.

7 And then, using existing space to construct, to build  
8 this many units, can only bring good things to the neighborhood  
9 and area and no bad things.

10 And all these constructions and renewal will improve the  
11 area and bring, yeah, new elements, and it will bri- -- and the  
12 real estate will appreciate.

13 And I absolutely agree this proposal, this plan of  
14 constructing 1,600 units in this area.

15 This my opinion. Thank s.

16 MR. KWAN: (In English.) Thank you.

17 PRESIDENT WU: Thank you.

18 Okay, next speaker?

I-Hunting

19 MS. HUNTING: Good afternoon, my name is Patricia  
20 Hunting. I am a resident of 1512 25th Street. I'm a neighbor  
21 of the SF Hope reconstruction site.

22 While I'm very much in favor of seeing an improvement to  
23 the south end of our neighborhood, I have some concerns with  
24 the projected number of units being built.

25 I moved to Potrero Hill in 2003 and I moved there with

GC-1,  
cont.

GC-1

PD-1

1 the idea that I liked that it was not one of the most dense  
2 neighborhoods in the city.

3 I think tripling the number of units that we have  
4 existing is exaggerated and I would like to see some kind of a  
5 compromise reached so that we won't have that many additional  
6 people living there.

7 I would like to know, if all the new units were  
8 completely full with the maximum number of residents what that  
9 number will be, compared to the number of people that we have  
10 existing in the units that exist right now.

11 I am concerned about the issues with transit. There are  
12 very narrow streets going in and out of our neighborhood,  
13 especially on the south side where 25th Street is and also  
14 going out from 26th onto Cesar Chavez to get to the highways,  
15 both 280 and 101.

16 I've already seen increased traffic in our neighborhood  
17 before this project has even begun, and I would like to know  
18 how you plan to help mitigate the issues of coming and going  
19 from our neighborhood.

20 I think 10 years is a very long time to ask neighbors to  
21 be patient with a reconstruction project. I would appreciate  
22 very much if there could be some kind of a compromise struck  
23 with that proposal as well. I would like to see less time in  
24 construction.

25 On 25th Street, where I live, the wind blows from west to

PD-1,  
cont.

TR-3

PD-6  
WS-3

I-Hunting, continued

PD-6,  
WS-3,  
cont.

1 east, generally. It brings all the trash and garbage over the  
2 hill and onto our street. I would also appreciate that that be  
3 taken into consideration and perhaps you could put some kind of  
4 a plan in place to help keep our part of the neighborhood clean  
5 during the construction process.

GC-1

6 I think the things that Hope SF is planning -- the things  
7 that they're planning are very well designed. I've seen great  
8 improvement with the people that live in the projects right now  
9 and I would really like to see those people have a better place  
10 to live in the future, and I would like to see, like the rest  
11 have stated, more safety in our neighborhood.

12 Those are all my comments. Thank you very much.

13 PRESIDENT WU: Thank you.

14 Next speaker?

I-Gudmundsson (2)

15 MR. GUDMUNDSSON: My name is Dadi Gudmundsson.

16 For the spelling you're going to have to see the card.  
17 It's hard.

GC-1

18 And I live in 27 Blair Terrace, San Francisco. That's  
19 literally a few yards away from the site that we're talking  
20 about.

21 And for brevity, I will omit various appreciation for  
22 many well-done parts of the EIR and move on to my grievances.

PD-2

23 It appears to me that the authors of this report have, in  
24 regards to one fundamentally important aspect, lost sight of  
25 the forest from the trees.

1           What I'm referring to here, that this fundamental  
2 defining aspect is that we're increasing the density of this  
3 area, massively, to integrate low-income housing with a greater  
4 community.

5           That is -- if I'm not mistaken, is one of the core  
6 reasons for this controversial density increase.

7           So -- and there is no -- the report doesn't really  
8 define -- and hence, not review -- where, exactly -- and I say  
9 the word "exactly" -- the 606 low-income housing units will be  
10 located within this area.

11           So this may be an unfortunate omission because the  
12 developers aren't sharing that information anymore. But there  
13 exist previous disclosed plans that I've seen in public  
14 meetings that show the entire -- well, the southwest block --  
15 yards from where I live, incidentally -- will only be composed  
16 of low-income housing units.

17           This is, essentially, a new high-density project,  
18 microproject, within the larger area.

19           Of course then there are other -- two other clusters as  
20 well.

21           And I think this goes against the fundamental premise of  
22 increasing the overall population density in order to allow the  
23 low-income housing units to be integrated with the larger  
24 community.

25           The appendix shows -- to the reports, shows numerous

PD-2,  
cont.

1 letters received commenting on this, the report mentions that  
2 is a known controversy, but, still, it is not addressed  
3 adequately. But it cannot be avoided.

4 A final EIR can only be complete with exact locations of  
5 the low-income housing units defined in a diagram, along with a  
6 complex socioeconomic impact analysis of the proposed  
7 locations.

8 If this reveals that there is, indeed, the idea to create  
9 little micro high-density clusters, then the impact analysis of  
10 going to that -- and might even go into the community that I  
11 live in, Parkview Heights, which is a HOA with 200 units, and  
12 we would suddenly get a cluster -- high-density cluster of  
13 low-income housing right on our doorsteps.

14 This needs to be considered.

15 This has been sent in a letter that will be received. In  
16 the back of the letter there are also questions that I've  
17 frequently been encountered, such as what are these plans, why  
18 is the developer doing this, what is the ideal solution to the  
19 problem, is the ideal solution possible?

20 This is all addressed here.

21 And I would say the ideal solution is possible because,  
22 the report says low-income housing will be --

23 COMMISSION SECRETARY: Thank you, sir. Your time is up.

24 MR. GUDMUNDSSON: Thank you.

25 PRESIDENT WU: Thank you. We will take written comments



1 until January 7th.

2 As the next speaker comes up, I'll call more names.

3 Kim Christiansen, Thu Bahn, Joe Boss, Janet Carpinelli.

4 MS. WEINSTEIN: Great. I don't know if you can hear me  
5 here.

O-Bridge Housing

6 I'm Emily Weinstein. I'm with Bridge Housing, the master  
7 developer on the project, and I'm going to keep my comments  
8 very brief.

9 But we are excited that this project is moving forward.  
10 We're excited about this step in the public process.

11 And the public process, the project you have before you,  
12 represents a two-year public process of a master plan. And we  
13 take the public process very seriously.

GC-1

14 And so I just wanted to also make sure that on the  
15 record, you know, due to the storm, we had over 25 -- closed to  
16 30 -- public housing residents that were signed up to come  
17 today. Due to the storm and the closures of the school, many  
18 were not able to be in attendance.

19 So I just wanted to put that on record that this is not a  
20 great reflection of the public process and we're encouraging  
21 people to submit written comments.

22 But it's important that you know that we have an ongoing  
23 public process, we have meetings every other month to make sure  
24 that people are included in the development process.

25 So thank you.

1 PRESIDENT WU: Thank you.

GC-1

2 MS. BANH: Good afternoon. Thank you for allowing me  
3 this opportunity to speak. My name is Thu Banh. I'm with  
4 Bridge Housing. I am the Rebuild Potrero program director.

5 I just wanted to share a little bit of my perspective on  
6 behalf of the residents that aren't able to attend today.

GC-1

7 In my capacity, we do a lot of community building with  
8 residents and what I've heard from them is that obviously, as  
9 you know, the public housing was built back in the 40's and  
10 50's and hasn't meant to stand and be in use as long as it has.

11 And people are very excited and really looking forward to  
12 having new homes that -- where they don't have the fear of  
13 roaches or lead or mold and to live under the current  
14 conditions that they are living.

PD-4

15 They are also very excited about the opportunity of  
16 additional open space and parks and places where they can take  
17 their children and families.

18 Right now there really is a scarcity of those types of  
19 locations and safe locations in order to do that.

20 In addition, the additional community center retail space  
21 is another great amenity that people are looking forward to.

PD-3

22 On that side of the hill obviously there's not a lot of  
23 places for people to go to.

24 And on top of that, some residents have also expressed to  
25 me with the new retail and other opportunities they also feel

1 that they may have a chance to start their own business or  
2 somehow participate in that and really see it as an upward  
3 movement for themselves and for everybody in the community.

4 So we encourage you to support the project so that  
5 everyone's quality of life can be improved in the area.

6 Thank you.

7 PRESIDENT WU: Thank you.

8 Next speaker?

I-Christiansen

9 MS. CHRISTIANSEN: Hi. Good afternoon. My name is  
10 Kim Christiansen and I am also a resident of Potrero Hill, and  
11 I am enthusiastically in favor of this project and I hope we  
12 can get it going and start building right away because it has  
13 amazing potential for all the residents of Potrero Hill.

14 I've had the opportunity to work with Bridge Housing and  
15 SF Hope, the Mayor's Office on the Community Advisory Group  
16 this last two years, and we were working on the people plan,  
17 which is the kind of companion piece to the rebuilding  
18 component focusing in on, like, a community-in-need assessment  
19 and looking at opportunities to raise the quality of life and  
20 really embrace the residents of the neighborhood so that they  
21 are going to have solid, you know, improvements and investments  
22 in the community from a social aspect as well. And that's  
23 really critical.

24 I had a chance to get to know some neighbors through this  
25 community-building process and see folks that are living in the

PD-3,  
cont.

GC-1

I-Christiansen, continued

1 Terrace and Annex housing programs, have jobs in the planning  
2 process or work on the urban farm, and I've really seen my  
3 neighbors blossom, just having these opportunities, having  
4 mentoring, leadership training, and paid jobs. It's just  
5 changed lives.

GC-1,  
cont.

6 So I'd just like see to this be expanded and through the  
7 construction process and continued community building work that  
8 Bridges is doing has so much great potential for our  
9 neighborhood.

10 So thank you very much.

11 PRESIDENT WU: Thank you.

I-Boss

12 MR. BOSS: Good afternoon, Commissioners. My name is  
13 Joe Boss and I live in Dogpatch and have for 32 years and have  
14 always been frustrated with the city's inability to deal with  
15 the Potrero Annex and Terrace.

16 It's been skipped over a couple of times and we're  
17 finally at a point where it actually has a good development  
18 community. And the outreach has been absolutely the best I  
19 have ever seen. And I mean that.

GC-1

20 And probably 20, 25 years ago I worked with some people  
21 who were tenants of the Annex and Terrace and we did a cleanup  
22 that the housing authority was unable to and I guess there were  
23 probably about 25 people who showed up. They were either  
24 mothers of tenants or white people who lived down the hill.  
25 What can I say? It's reality.

1           We have worked so hard to bring this project to this  
2 point and the EIR and EIS has been painstakingly, rigorously  
3 followed.

4           Yes, there are always the problem of, "Oh, we're going to  
5 have an influx of people."

6           I live in Dogpatch. I mean, Central Waterfront, Pier 70,  
7 et cetera. And all the projects that are going on there, this  
8 will certainly augment what's going on at the Annex and Terrace  
9 for those people who live there.

10           And it also expands quite a bit the market-rate housing  
11 that really goes a long way to making it a mixed community.

12           I can't say enough about Emily and her work. I've seen a  
13 lot of projects falter when it comes to community involvement  
14 and this one certainly hasn't.

15           As far as, like I say, the EIR/EIS I think has been  
16 exhaustively gone over. The comments originally certainly did  
17 slow the process down, as answers were made to the questions  
18 raised.

19           I heartily support this EIR/EIS and I hope you guys will  
20 concur.

21           Thank you very much.

22           PRESIDENT WU: Thank you.

23           Next speaker?

24           I'll call some more names, also.

25           Bonnie Bergeron, Richard Lee, and Lee Able.

GC-1,  
cont.

1 MS. CARPINELLI: Good afternoon, Commissioners, my name  
2 is Janet Carpinelli. I am also a 30-plus-year resident of  
3 Potrero. I live in Dogpatch. I'm a member of the Potrero  
4 Boosters. And from where I am, we look up the hill to this  
5 project, the Potrero Annex and Terrace.

6 We've been looking forward to seeing the remodel for  
7 years and years and years.

8 And I would also like to concur with the last two  
9 speakers in that the group that's doing this project now,  
10 Bridge Housing Rebuild, has done a fantastic job of keeping the  
11 community involved and bringing very different people together.

GC-1

12 There have been many, many, many postcards, ads, articles  
13 in the Potrero View. They've been to the Potrero Festival for  
14 years. They do everything they can to be out there in the  
15 public and bring people together.

16 I've been up to many get-togethers and working workshops,  
17 et cetera, et cetera, and I really think that this project  
18 should go through and that it's been studied and it's got a lot  
19 of comments from people in the neighborhood.

20 I think the idea that there's going to be a new and  
21 extended street grid system so there'll be more transportation  
22 in and out, more ways to get in and out, and more ways to bring  
23 people around the hill is a plus.

24 In general, I would like to say -- this is really for the  
25 city, rather than the project, is that we must have more and

I-Carpinelli, continued

1 better public mass transit all over the city, and particularly  
2 Potrero Hill/Central Waterfront.

3 So as far as the project goes, I'm very much in favor of  
4 it and I'm looking forward to seeing it move ahead.

5 Thank you.

6 PRESIDENT WU: Thank you.

7 Next speaker?

I-Shaw (2)

8 MR. SHAW: Good afternoon, my name is Thomas Shaw.

9 And I think it's commendable that you're attempting to  
10 modernize Potrero Hill, but I wasn't served when the services  
11 came out, when they carried out the scoping, and I actually own  
12 Potrero Hill.

13 So I don't -- I support Alternative 3. I don't want any  
14 changes to take place in Potrero Hill.

15 The problem was in the zoning. They zoned it for public  
16 housing and it's really private property.

17 So I wanted to make a note today, before I carry out any  
18 more proceedings, that a mistake has been made. I don't want  
19 construction in the neighborhood and I think that any changes  
20 that have to be made is my responsibility.

21 So, again, I'll have to support Alternative 3, no changes  
22 is to be made.

23 PRESIDENT WU: Thank you.

24 Next speaker?

I-Abel (2)

25 MS. ABEL: Hi, I'm Lee Abel. I live on Wisconsin Street

GC-1,  
cont.

1 between 25th and 26th Street. And I think that my street is  
2 probably one of two streets that are the most impacted with the  
3 rebuilt.

4 First off, though, I would like to say that I am for a  
5 rebuild, I am no way against a rebuild; however, I do have some  
6 serious concerns.

GC-1

7 On my street right now I can only have one person at a  
8 time visit me because if they park across the street they  
9 probably have about a 50/50 chance of their car being broken  
10 into.

11 So this is going to be great that we're going to have  
12 some eyes on the street over there.

13 But my concerns are several, and I'll try and be brief.

14 I am concerned about the high density. I'm concerned, in  
15 specifically, about how that is going to affect Wisconsin  
16 Street.

TR-3

17 Right now we have the majority of the bus traffic, and  
18 that is supposed to continue, yet the buses will -- there'll be  
19 more of them. Then they turn on 25th Street and they go down  
20 the hill.

21 So we are the block that has the most bus traffic of  
22 anywhere.

23 We're a very narrow street. I understand they're going  
24 to enlarge the street and make perpendicular parking, but I'm  
25 still kind of frightened.



1 Right now, if two buses are going up, one's going down --  
2 happens all the time -- there's a gridlock on the street; we  
3 have to wait.

4 I am very concerned that they're going to be cutting down  
5 all the trees over there, there's going to be a lot of smog  
6 going on, then we don't have any mature trees.

7 My primary concerns also have to do with the  
8 Environmental Impact Report, the topics, the three topics with  
9 significant impacts that could not be fully mitigated. This is  
10 in the EIR: Noise, air quality, and transportation.

11 So I'm living across the street for 10 years where we  
12 can't mitigate noise, air quality, and transportation?

13 I work out of my home. Should I be moving? I mean, I'm  
14 not sure how to address that. I'd like the project to continue  
15 but significant impacts that cannot be fully mitigated is a  
16 little frightening.

17 I'm concerned there's serpentine rock, which has a known  
18 asbestos in it. I think in the report there was a percentage  
19 of how much asbestos, but I couldn't find it, again, when I  
20 went back. It's kind of thick.

21 I'd really like to know what that percentage is. I think  
22 it's critically important that that be right up front with the,  
23 you know, 10 years' of asbestos in the air.

24 Mostly concerned about the open space. And specifically  
25 on the maps I've seen Starr King open space, which is on the

I-Abel (2), continued

PD-4,  
RE-1,  
cont.

1 other side of Starr King school. They're showing how, "Well,  
2 that's just right across the street from the new rebuild.  
3 Won't that be great?" Yeah, that will be great. It's a  
4 wonderful open space. But it can't be the major open space of  
5 the project. There's only 2.5 acres of open space in the  
6 project and the Starr King is larger than that.

7 They need funding to fix the sidewalks. They need some  
8 help. That's going to be the space that people are gonna go  
9 into. And perhaps they could take that into consideration and  
10 help out with Starr King open space.

11 Thank you very much.

12 PRESIDENT WU: Thank you.

13 Next speaker?

I-Lee R (2)

14 MR. LEE: Hello. My name is Richard Lee and I live at  
15 1099 Mississippi Street, very close to the rebuild area.

GC-1

16 I'd like to voice my support of the project. I think it  
17 will be an excellent use of the currently low-density buildings  
18 to increase the density of that area. I think bringing  
19 additional people into that area will be a good thing.

TR-3

20 However, I do have some concerns about the extra traffic  
21 that that might entail.

PD-3

22 I would like to see an increase in the amount of retail  
23 space that's being planned for the project because I think that  
24 if there are more services in that area it will make it less  
25 likely that people feel the need to leave and come into the

I-Lee R (2), continued

PD-3,  
cont.

1 area and that will help reduce the amount of traffic in and out  
2 of the rebuilt area.

TR-5

3 Also, I would like to see more -- a new bus line added  
4 into that area because I think that with, you know, perhaps  
5 tripling the number of people in there I think we're going to  
6 need another bus line to help service all those people.

7 So that's all. Thank you very much.

8 PRESIDENT WU: Thank you.

9 Next speaker?

I-Montalto (2)

GC-1

10 MR. MONTALTO: Good afternoon, my name's Dennis Montalto  
11 and my wife's Bonnie Bergeron.

12 We've been residents of 25th Street -- we're at 1504 --  
13 for about 30 years, so we've seen a lot of changes come into  
14 that area.

PD-1

15 We are in support of the Rebuild Potrero idea. We just  
16 do have some concerns about, one, the project density, going  
17 from the 600 to 1,700, seems -- the infrastructure, I just am a  
18 little concerned about that.

TR-3

19 The corridors to 280 on-ramp, Cesar Chavez, I would just  
20 like to see how that could be worked into this plan where right  
21 now the corridor down to 280 is 25th Street and it's a very  
22 narrow street.

23 We put a bus line, the 48 comes down there now, that's  
24 been going on for about four years and it can barely -- if two  
25 buses are trying to pass on there, it can't happen.

I-Montalto (2), continued

TR-3,  
cont.

1           So I'm just wondering, with this kind of density, how  
2 they'll address the infrastructure of the surrounding area to  
3 make it flow.

4           Secondly, the mitigation, a 10-year project, we're in the  
5 wind path of anything that goes on up there. The wind, almost  
6 every day, blows from west to east.

PD-6  
WS-3

7           So I would like to see that addressed so that the people  
8 that live there -- there's quite a few people that live south  
9 and east of this project, and I'm just a little concerned about  
10 that. Ten years seems like a long time for a project to take  
11 place.

12           Thank you very much.

13           PRESIDENT WU: Thank you.

I-Bergeron

14           Is there additional public comment on this item?

15           MS. BERGERON: Hi there. I'm Bonnie Bergeron. I live at  
16 1504 25th Street and I have lived there for about 27 years.

GC-1

17           I've seen lots of changes on the hill. I am totally in  
18 support of this project. I've really participated in it in the  
19 first couple of years. It's been wonderful to see the  
20 community-building and to feel the vibrancy of the area and  
21 watch people take ownership and watch crossover between  
22 Potrero Hill and the Terrace and the Annex because they are all  
23 so separated. And so it's been really great to see all of that  
24 opening up.

TR-3

25           At the same time, my concerns are similar to a few other

I-Bergeron, continued

1 people who spoke who live directly in the area. The congestion  
2 and the traffic -- I'm trying to wrap my mind around it.

3 And when I come home now and I'm heading down  
4 Pennsylvania Street towards 25th and I'm a half a block away  
5 and it's during high traffic areas, I'll sit in my car for 10  
6 minutes. There's no light there; it's just stop signs.

7 And my concern is -- and what I'd like to encourage is  
8 there's so much building going on in Dogpatch and Potrero Hill  
9 that I wonder how the communication is happening around the  
10 overview of traffic flow. Because we're bringing in people --  
11 in terms of density, we're increasing it substantially.

12 And I think that that really needs to be looked at and  
13 addressed and I hope that that communication happens soon.

14 And I do support the project.

15 Thank you very much.

16 PRESIDENT WU: Thank you.

17 Next speaker?

O-Potrero Boosters

18 MR. EPPLER: Good afternoon, Commissioners. My name is  
19 J.R. Eppler. I'm the president of Potrero Boosters  
20 Neighborhood Association.

21 I want to start off by saying of course the condition of  
22 public housing on the south slope of Portrero Hill is  
23 catastrophically bad. It certainly needs to be redone.

24 And I also want to say that Bridge Housing has played a  
25 very positive role in our community and they have been very

TR-3,  
cont.

GC-1

GC-1

GC-1,  
cont.

1 excellent partners in this process.

2 However, that said, today I'm here to comment on the EIR  
3 and I do have a couple of concerns with the EIR as it's  
4 currently drafted.

5 First, I feel like there should be an expansion of the  
6 cumulative effects analysis. I understand that this is, of  
7 course, a moving target and a lot of projects take this  
8 sequentially. However, when they're all occurring at the same  
9 time the effect is massive.

CA-1

10 Right now we have actual data in pipeline for the eastern  
11 neighborhood's plan and not just a plan. This is information  
12 that should be integrated into the analysis of the effects of  
13 this project.

14 We also have additional plans nearby that are currently  
15 in process, or a draft plan, some, like, Pier 70 currently  
16 coming on line, some, the Warriors Arena.

17 How these play out will have a catastrophic effect on how  
18 transit in and out of what's a constrained geographic area will  
19 work.

20 Also, with respect to the dealing with transit issues,  
21 there needs to be, I think, an additional use at the transit  
22 effectiveness plan as it's being carried out and not just a  
23 cursory look at it using the principle transit analysis with  
24 the pre-TEP transit lines.

TR-5

GC-1

25 And I think that there are some identified features that

1 can be dealt with going forward after the EIR with just simple  
2 design features and back and forth among the neighbors.

3 Some of those, whether it's seen like vista from existing  
4 park space probably can be dealt with in design, might not be  
5 EIR related but should be pushed as part of the process going  
6 forward.

7 We have one chance to get the EIR right. We have one  
8 chance to get the planning process for this right.

9 Because of the size of this project, it is vitally  
10 important -- because of all the other things going on, it's  
11 vitally important for us to make sure that we take -- even if  
12 it's just a little bit of additional time to get this part  
13 right because it is what is going to make this project work for  
14 all these residents.

15 Thank you.

16 PRESIDENT WU: Thank you.

17 Is there additional public comment on this item?

18 (No response.)

19 Okay. Seeing none. Commissioners.

20 Commissioner Moore.

A- Commissioner Moore

21 COMMISSIONER MOORE: Notwithstanding that this is an  
22 outstanding project, I want to just jump into commenting on the  
23 EIR.

24 I think the EIR is very good. It's well structured.

25 However, I have a couple of questions, which I believe need to

GC-1,  
cont.

GC-5

PD-6

1 be elevated. It's in the area of construction impacts.

2 With funding for a project which has large public  
3 components, I think only focusing on construction impacts over  
4 a finite time frame of 10 years is potentially dangerous  
5 because, as you extend some of the construction impacts over  
6 more than 10 years, it becomes almost a generational issue that  
7 people basically live in a continued construction site.

8 This is exacerbated by extremely difficult grading  
9 conditions, which, on their own, require a large amount of cut  
10 and fill, and I'm not even talking about air quality and noise,  
11 two areas where I think the city has a lot of experience with,  
12 but the constant need for a large area, the perimeter of this  
13 site is huge, people feeling that it's never finished.

14 Can we get certainty about the public funding aspects as  
15 they effect construction impact, is there certainty about how  
16 the project can reasonably phase and what commitments can we  
17 bring to the front table in an EIR to say this will happen in  
18 X, Y, Z.

19 Most construction projects of this size take  
20 significantly longer than 10 years. We all know that. There  
21 is Bayview-Hunters Point, there is Treasure Island and on and  
22 on and on. All of them have public components, all of them  
23 have difficulties comparable to what we have in front of us  
24 here.

25 It is for this very reason, myself having worked on these

PD-6,  
cont.



A- Commissioner Moore, continued

1 things for the last 9 years, that I ask you to be very  
2 conservative in how you set finite time frames for construction  
3 impact and comment on them.

PD-6,  
cont.

4 It might be a larger issue to examine, and even if there  
5 is deferral to other things, I think the EIR/EIS needs to be  
6 very clear and precise for this type of an important project.

7 PRESIDENT WU: Thank you.

8 Commissioner Antonini.

A- Commissioner Antonini

9 COMMISSIONER ANTONINI: Thank you.

10 I think the draft EIR has a lot of things that are very  
11 well done, in my opinion.

GC-5

12 There was one place that I spotted -- it's only a  
13 projection and it was probably done quite a while ago -- on  
14 page 4 -- 4 point -- dash 4, and it talks about the population  
15 of San Francisco and it basically deals with census track 614.

16 And this is just not that critical to the report itself,  
17 but the projected population of San Francisco on this for 2015  
18 is 816,400. And as we'll see in our Commerce and Industry  
19 Report, the projected population of San Francisco in 2014 or  
20 2013 is already 636,000.

SE-1

21 So, I mean, I know it doesn't mean we have to redo any of  
22 the report, but the projection, for what it's worth, is  
23 probably not accurate, as far as the reality is concerned,  
24 right now.

25 I can't comment on the accuracy of the census track in

SE-1,  
cont.

1 particular; we're just looking at the overall picture.

PD-1

2 The other thing that I think will need to be answered as  
3 comments and responses is there were a lot of comments about  
4 the density, which, you know, is very appropriate in my mind if  
5 it's denser, but I think comparisons of the density in the  
6 areas surrounding the project area with the projected project  
7 density so that we have an idea of the differences in density  
8 -- it's not like -- Potrero Hill does have a variety of  
9 densities. It's not all just single-family homes. There are  
10 many parts of it who already have much denser parts. So that  
11 would be good to answer.

12 I think it's -- you know, the report is good. I think we  
13 have to talk a little bit about the phasing of the plan and a  
14 little bit more detail about how it's going to reach its goal,  
15 as Commissioner Moore was talking about, in the ten-year period  
16 of time.

PD-6

17 But I think, from my understanding, the fact that it's  
18 being done together over a finite period of time makes it more  
19 efficient because for this project to work we need to have all  
20 the parts of it. It's not going to work if there's just a part  
21 of it. We need to get the financing and it's going to provide  
22 economic and physical integration in a neighborhood which was  
23 segregated from the very beginning from the rest of  
24 San Francisco and the articulation of that neighborhood into  
25 the San Francisco grid, which will be a big improvement.

1 I did see one thing on View 5.3-13 -- and this is only an  
2 alternative, but it does show very well articulated area, but  
3 then it shows an area that looks like it's almost the same  
4 height.

5 I think this is probably -- this is a reduced development  
6 alternative, so I don't think that's representative of what the  
7 project would be looking like in the planned alternative. But  
8 I want to make sure that all the parts of the development are  
9 well articulated and are not just the same height all along in  
10 any part of the development.

11 And so that was one area that I wasn't quite sure what  
12 it's going to look like in the preferred alternative.

13 And of course the inclusion of retail is very important,  
14 and the open space. Those are a couple of other things.

15 And finally, the transportation issue, which was raised  
16 by many speakers. I mean, I think some attention should be  
17 given to looking at trying to get some sort of extension from  
18 the Third Street Light Rail that would service Potrero Hill  
19 would be a big benefit and also improvement of the existing  
20 Caltrain station that would also cause an easy commute from  
21 there to downtown San Francisco as far as other parts of the  
22 Peninsula.

23 So I think those are a couple of areas that might solve  
24 some of the problems that everyone has talked about about buses  
25 coming in, limited numbers of streets.

A- Commissioner Antonini, continued

1 If we had a Light Rail extension from Third Street that  
2 came onto the hill we'd probably solve a lot of problems. Then  
3 people could walk to that, rather than having to wait for the  
4 bus to come to them.

5 Thank you.

6 PRESIDENT WU: Thank you.

7 Commissioner Johnson.

A- Commissioner Johnson

8 COMMISSIONER JOHNSON: Thank you very much. I also will  
9 echo strong support of this project. Public housing has always  
10 been a challenge in San Francisco. The lack of federal funding  
11 has mean that there hasn't been enough funding for maintenance,  
12 let alone improvement. So this is a fantastic move in the  
13 right direction, along with Alice-Griffith and some of the  
14 other public housing sites that will be rebuilt in the future.

15 I just have a couple of questions. I echo some of  
16 Commissioner Moore's comments about construction impacts and  
17 the length of time in which they are going to be considered.

18 Ten years is a wide enough berth that you have to think  
19 that there might be impacts that are going to linger after  
20 that, even after the last unit is built.

21 But my comments are about the population, housing  
22 section, and also transit, transportation and circulation.

23 So on the population and housing section the EIR has to  
24 consider changes to the population and housing if the rebuild  
25 will require provision of housing units in other parts of the

TR-5,  
cont.

GC-1

PD-6

SE-2

1 city. So if you need to create more housing units somewhere  
2 else, then you have to consider that a physical impact of the  
3 project for population.

4 And I question -- I question the determination that that  
5 is not the case for this project.

6 Unlike Alice-Griffith, where there's an open site right  
7 next to the housing development, so you're building the new  
8 housing while people are still living there and moving them as  
9 units are complete, for this project you need to bulldoze  
10 buildings in phases and people need to move either somewhere  
11 else on the site or probably somewhere else in the city, if  
12 there's not enough empty units in other buildings.

13 And I question that given all of the efforts that are  
14 being made around the city to build new units, that there's  
15 going to be room for the residents of complete sections of  
16 Potrero Hill and Potrero Annex and other parts of San Francisco  
17 in the phases when their section of the project are being  
18 demolished.

19 So I really would like more description as to the  
20 relocation plan and where those people are supposed to go.

21 I know relocation plans are pretty complex, there's a lot  
22 of moving pieces to them, but we can at least talk about the  
23 projection of where these people are supposed to go, whether  
24 it's where it is in San Francisco or even potentially where  
25 outside of the city, so we can make sure that there's no

SE-2,  
cont.

SE-2,  
cont.

1 physical impacts in the population change.

2 The other thing is for transit and transportation I  
3 thought that the -- this is more about the project and less  
4 about the analysis of the project, but if the project needs to  
5 change, the analysis will have to change as well.

TR-7

6 Certain streets are going to be realigned with the grid  
7 as well as graded to decrease their steepness while they're  
8 rebuilding parts of this project. And I think that that will  
9 change the equation for the amount of bicycle facilities that  
10 are going to be needed and wanted by the population. And I  
11 thought that the plan for bicycle facilities was woefully  
12 inadequate, and therefore the analysis of where they are  
13 supposed to go and the impact of cycling on the transit and  
14 circulation is also inadequate because the project doesn't  
15 account for it enough.

16 So I think that that needs to be added in some --  
17 someone's alternative.

18 And then for the transportation, I know people have  
19 talked a lot about transit and issues with buses getting up and  
20 down the narrow streets.

TR-5

21 Again, a lot of the streets will be re-gridded, some of  
22 them will be widened, there will be changes to the circulation  
23 patterns, so I think that that is less of an issue.

24 The only thing that I would say is that the transit  
25 impacts included the increase in transit from the Phase II EIR

1 for Hunters Point Shipyard/Candlestick Point.

2 And while I do think that that's pretty much as far as  
3 you can go in terms of projecting the future -- I mean, you can  
4 theoretically talk about Pier 70, but you really don't know  
5 until you start seeing the first phases of those projects  
6 what's actually going to be there and what people are going to  
7 need.

8 But I would say that I would like to see a little bit  
9 more direct information about how the express lines that are  
10 going to be running down Third Street from Hunters Point  
11 Shipyard/Candlestick Point are going to impact the transit, the  
12 TEP lines that are planned.

13 So right now, you know, it only talks about the Muni  
14 lines that go through the project sites, Potrero Hill and  
15 Potrero Annex, but I think that the Hunters Point  
16 Shipyard/Candlestick Point plan accounts for multiple express  
17 lines that will be going down Third Street that will be  
18 accessible to people who live in Potrero Hill and potentially  
19 alleviate some of the demand on lines like, I think the  
20 Fillmore 11 and the 10 Townsend, which will be renamed  
21 something.

22 So I would like to see -- even if it's already been  
23 considered, I'd like to see that at least mentioned in the EIR  
24 explicitly because I think that that's impacted.

25 Thank you. (Coughing.) Hold on.

TR-5,  
cont.

GC-1

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PRESIDENT WU: Okay. I wanted to also express a lot of support for this project, happy that we're at this movement in it.

There was some public comment asking to look at new bus lines. There is a lot of analysis on existing and also on the TEP.

TR-5

But I know there may be a process happening at the Transportation Authority right now at looking at transportation on Potrero Hill. But the more that any impacts can be looked at within this EIR to make sure that we can get all the improvements and all the additional transit that we can to this site on board as soon as -- as soon as we can align it with this project, I think that that would be very helpful.

So seeing no further comments, again, the department is taking comments until January 7th.

COMMISSION SECRETARY: If there's nothing further, we can move on to item 10.

(Whereupon, the proceedings regarding Item F. 9. were concluded at 1:19 P.M.)

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I, Kelly Lee Polvi, CSR, RMR, FCRR, do hereby certify to the following:

That I was present at the time of the above proceedings;

That I took down in machine shorthand notes all proceedings had and testimony given to the best of my ability;

That I thereafter transcribed said shorthand notes with the aid of computer transcription and supplemented with the SFGovTV audio- and videotaped recording.

That the above and foregoing is a full, true and correct transcription of all proceedings had and testimony taken;

That I am not a party to the action or related to a party or counsel;

And that I have no financial or other interest in the outcome of the action.

IN WITNESS WHEREOF, I have hereunto set my hand this 30th day of December, 2014.



\_\_\_\_\_  
Kelly Lee Polvi  
CA CSR No. 6389  
Registered Merit Reporter  
Federal Certified Realtime Reporter

