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City & County of S.F.
Dept. of City Planing

August 9, 2005

AUG 15 2005

OFFICE OF
ENVIRONMENTAL REVIEW

VIA FACSIMILE and U.S. MAIL

Mr. Paul Maltzer
Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103

Re: Draft Environmental Impact Report for the Market and Octavia Neighborhood Plan

Dear Mr. Maltzer:

We are writing on behalf of our client, Safeway Inc., to provide comments on the Draft Environmental Impact Report (the "Draft EIR") for the Market and Octavia Neighborhood Plan (referred to herein as the "Plan" or the "Project").

Without having sought input from Safeway as to the desirability or viability of tearing down the existing, recently remodeled Market Street Safeway store, the Plan proposes a redevelopment strategy that would entail demolishing all structures on the site (the "Property") and constructing housing over a Safeway store.[1] As a result, the existing store would shrink in size by 40% (from 63,480 square feet to 38,000 square feet, thus failing to satisfy customer grocery needs) and its parking area could be reduced to a mere 15 parking spaces. Although Safeway made it abundantly clear early in the EIR process that the proposed redevelopment strategy was totally infeasible, the Draft EIR nonetheless and inexplicably proceeded to analyze it. S-1

As explained in detail in our November 18, 2003 letter to you commenting on the scope of environmental review for the Project, the proposed redevelopment strategy is infeasible, would not meet the basic objectives of the Project to provide additional housing, and is otherwise unreasonable. For instance, according to the Plan, the proposed redevelopment strategy "should be considered as part of any proposal for new construction, addition, or extensive remodeling" of the Property. Plan, p. 156. This could mean that a small addition to one of the retail uses, or S-2

[1] All of the citations herein are to the December 2002 version of the Plan. The December 2002 version of the Plan is the version analyzed by the Draft EIR. Although the Planning Department prepared a February 2004 Summary of Proposed Revisions to the Plan, none of the proposed revisions relate to the Plan's proposed redevelopment strategy for the Property.

(taken to the extreme) even interior remodeling, could trigger a requirement for the entire Property to be redeveloped in accordance with the Plan. As a result, Safeway and the other tenants would likely forego improving the existing structures on the site in order to avoid application of the redevelopment strategy. As a result, the Project objectives to "maximize housing opportunity" and "[s]trengthen neighborhood-serving retail and services" would not be met. Plan, p. 14. Moreover, instead of a successful commercial site providing for the essential retail needs of the community, the Property could eventually be forced to become vacant and blighted, thereby producing urban decay impacts. Such impacts have not been analyzed or otherwise accounted for in the Draft EIR. In addition, the redevelopment strategy is oblivious to the fact that the Property is not owned by Safeway, but rather by multiple parties. Safeway thus cannot simply elect to construct housing in conjunction with store renovation or expansion activities. Moreover, the strategy — which would replace a completely remodeled store with a much smaller store with far fewer parking spaces — is completely infeasible from an economic standpoint and would fail to meet Safeway's basic objectives to operate a profitable and thriving grocery store. Despite our comments, which have never been addressed by the City, the Draft EIR proceeded to analyze this infeasible strategy for the Property. *See, e.g.*, Draft EIR, pp. 1-7, 3-33, 4-884-100, 4-102, 9.B-13. Our November 18, 2003 letter, which applies with equal force to the adequacy of the Draft EIR and should be considered comments on the Draft EIR, is attached hereto and incorporated herein by reference as Exhibit A.

S-2

In addition to analyzing an infeasible proposed project, the Draft EIR fails to adequately analyze the potential air quality, noise, and traffic impacts that would likely ensue if the proposed off-street parking standards set forth in the Plan were implemented. *See, e.g.*, *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco*, 102 Cal.App.4th 656 (2002) (secondary environmental impacts resulting from parking deficits and mitigation for such impacts must be evaluated in an EIR). For instance, the Plan would allow for a maximum of 1 parking space per 2,500 square feet of commercial development. Plan, p. 24. As applied to the Property, this would result in a total of 15.2 parking spaces for the 38,000 square foot store proposed by the Project. By comparison, the existing 69,780 square feet of retail space on the Property are currently served by 217 parking spaces. Further compounding the problem, no parking minimum would be required for the proposed 185 new residences. This would likely lead to motorists clogging city streets searching in vain for parking spaces that do not exist under the current Plan, thereby adding to traffic congestion and worsening air quality conditions. The potential environmental impacts associated with such vastly reduced off-street parking requirements must be analyzed and addressed as part of the Draft EIR, especially considering that off-street minimal parking standards such as those referenced above would apply to all 4,400 net new housing units (7,620 new residents) proposed by the Plan. *See*, Draft EIR, p. 4-231 to 4-232 (noting that under the allowed and conditional use development conditions, "the Project Area would not accommodate the entire parking demand and would result in an estimated shortfall of 3,560 spaces and 2,480 spaces, respectively, during the weekday evening.").

S-3

The Draft EIR acknowledges that the Project may have significant traffic impacts, but contrary to CEQA fails to propose feasible mitigation measures (or alternatives) to address such impacts. *See*, Public Resources Code § 21002.1 ("The purpose of an environmental impact

S-4

report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.") and CEQA Guidelines § 15126.4 (a)(1) ("An EIR shall describe feasible measures which could minimize significant adverse impacts . . .."); *see, also*, Public Resources Code § 21081. Instead, the Draft EIR concludes that the impacts are significant and unavoidable since the feasibility of proposed traffic improvements to mitigate such impacts (*e.g.*, signal timing changes) has not been fully assessed. *See, e.g.*, Draft EIR, Sections 5.7.C, 5.7.D, 5.7.E, 5.7.F, 5.7.G2, 5.7.H. This amounts to a dereliction of the City's responsibility under CEQA to propose feasible mitigation measures to avoid or substantially lessen the Project's significant environmental effects. The City cannot evade its responsibility to impose feasible mitigation measures to address potentially significant impacts by simply failing to analyze such mitigation measures. Such measures also amount to a blatant and impermissible deferral of mitigation. *See*, CEQA Guidelines § 15126.4(a)(1)(B) and *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296 (1988). S-4

Contrary to CEQA Guidelines § 15126.6, the Draft EIR also fails to consider a reasonable range of alternatives to the proposed Project. Other than the mandatory No Project alternative, the Draft EIR only considers a reduced density/reduced height alternative. The infirmity of the range of alternatives considered by the Draft EIR is underscored by the fact that neither alternative would reduce the Project's significant and unavoidable traffic impacts to a less than significant level. *See, e.g.*, CEQA Guidelines § 15126.6(b) ("Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives, or would be more costly."). S-5

In addition, the Draft EIR contains no substantive analysis of the Project's potentially significant air quality impacts. Instead, the Draft EIR simply discusses the Project's conformity with the Clean Air Plan. S-6

Also, no water supply assessment has been prepared and circulated with the Draft EIR as required by Water Code § 10910 *et seq*. *See, also*, CEQA Guidelines § 15083.5. S-7

In closing, Safeway appreciates the opportunity to comment on the Draft EIR. As we have mentioned on previous occasions, Safeway very much supports the concept of mixed-use development where such projects are feasible. As explained above (and in more detail in our November 18, 2003 letter), the Plan's proposed redevelopment strategy for the Market Street Safeway site, however, is simply not viable. As such, prior to certification of the Plan EIR, the redevelopment strategy for the Property must be either eliminated from consideration as part of the Plan or substantially revised to include reasonable alternatives that create incentives for future redevelopment, make such redevelopment entirely voluntary, and embody physical development criteria that will enhance the feasibility of mixed use development of the site. S-8

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November 18, 2003

Paul Maltzer
Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103

Re: 2003.0347E- Market and Octavia Neighborhood Plan

Dear Mr. Maltzer:

We are writing on behalf of our client, Safeway Inc., to provide comments on the scope of the proposed environmental impact report (the "EIR") for the Market and Octavia Neighborhood Plan (referred to herein as the "Plan" or the "Project").[1] We write pursuant to Public Resources Code § 21083.9 and CEQA Guidelines §§ 15083 and 15126.6.

At the outset, however, we must strenuously object to the notion that the Plan is ripe for preparation of an EIR. Safeway, whose property rights and business interests would clearly be affected by the Plan's redevelopment vision for the Market Street Safeway store site (the "Property"), was never consulted during preparation of the Plan. As a result, the Plan is based on inaccurate data and, as described below, proposes an infeasible redevelopment scheme for the Property. A fundamental error in the Plan is its premise that the existing Safeway is 50,000 square feet and that the Property includes 200 parking spaces. In fact, the footprint size of the existing Safeway store is 63,480 square feet (not including the basement). The Property also includes another 6,300 square feet of space devoted to retail shops, for a total of 69,780 square feet of existing retail space (nearly 20,000 more than depicted in the Plan). There are currently 210 parking spaces on the Property. At this point, the brakes should be put on any EIR process. The Planning Department should meet with Safeway and other affected retail interests to develop an accurate and workable plan before the EIR is initiated. Otherwise, the lengthy and costly EIR process will be meaningless and for naught.

S-9

[1] Although no notice of preparation has yet been published, the Notice of Public Scoping Meeting for the Project states that an EIR will be prepared. The Notice also explains that a scoping meeting is being conducted because the Project is of statewide, regional, or areawide significance.

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EXHIBIT A

Moving onto the environmental issues, since there is substantial evidence of a fair argument that the Project — with its emphasis on substantially increasing residential development in the Plan area — may have significant environmental impacts, we concur with your assessment that an EIR is required for the Project.[2]

As noted, without having sought input from Safeway as to the desirability or viability of tearing down the existing, quite new Safeway store at Church and Market Streets, the Plan proposes a redevelopment strategy for the Property that would entail demolishing all structures on the site and construction of housing over a Safeway store reduced in size from 63,480 square feet to 38,000 square feet (a 40% decrease). Safeway strongly supports creative mixed-use development where such projects are feasible, *i.e.*, they are voluntary and meet certain economic and physical development standards. Safeway's commitment to high density, urban infill projects is evidenced by the mixed-use (Safeway and housing) Mission Place project currently under construction in Mission Bay, as well as Safeway's other mixed-use projects on the west coast. However, the redevelopment strategy set forth in the Plan for the Property is by no stretch of the imagination feasible, would not meet the basic objectives of the Project to provide additional housing, and is otherwise patently unreasonable. As such, the Plan's redevelopment strategy must — from both a legal and practical standpoint — be eliminated from consideration as part of the Plan and the Plan EIR. S-10

In the remainder of this letter, we will summarize the contents of the Plan pertaining to the Property, set forth the legal constraints that apply when formulating a project description or alternative for analysis and consideration, and detail the countless reasons that the Plan's proposal for the Property cannot survive scrutiny under the applicable legal criteria. As a result, we are confident you will agree that the Plan must be altered to remove the Property from it, and that (if the Property for some reason remains in the Plan at all) the EIR must consider reasonable alternatives that create incentives for future redevelopment, make such redevelopment voluntary and embody physical development criteria that will enhance the feasibility of mixed-use development.

A. The Plan's Proposal for the Property

On December 17, 2002, the City released the Plan for public review and comment. The Plan encompasses an area of roughly two to three blocks along Market Street from about 9th Street to the east to Noe Street to the west, north along the former Central Freeway alignment to Turk Street, between Laguna and Franklin Streets, and south along Howard and Sixteenth Streets. Included in the Plan's list of broad objectives (Plan, p. 14) are the following: S-11

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[2] *See, e.g.*, Public Resources Code §§ 21080(d), 21082.2(d); CEQA Guidelines § 15064; *Laurel Heights Improvement Association v. Regents of University of California*, 6 Cal.4th 1112, 1123 (1993); *No Oil, Inc. v. City of Los Angeles*, 13 Cal.3d 68, 75, 82 (1974); *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas*, 29 Cal.App.4th 1597, 1602 (1994); *Friends of "B" Street v. City of Hayward*, 106 Cal.App.3d 988 (1980). *See, also*, CEQA Guidelines § 15064(f)(1) ("[I]f a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.").

- Encourage building forms that maximize housing opportunity, provide comfortable street enclosure and sun access, and enhance the area's established physical fabric by contributing to the quality of the place;

- Strengthen neighborhood-serving retail and services on established commercial streets well served by transit and within easy walking distance of all residential areas, reducing the need to drive.

The Plan specifically identifies the Property (in addition to the Central Freeway parcels)[3] as one of the key sites for infill housing development.[4] The Plan states that the current Safeway site configuration "creates an 800-foot void in the streetwall along Market Street and seriously diminishes its quality. While a supermarket-type use is appropriate here, the configuration and low level of development is not appropriate to the level of transit service provided to this site and the area by the city nor to the level of importance and prominence of this key intersection." Plan, p. 156. The Plan then states that "[t]he Safeway Site could be brought to Market Street, where it would have greater visibility, structured parking could be provided on one side of the site, and lined with a mix of smaller, accessory ground floor retail uses (similar to those currently lining the Safeway). Several floors of housing would be possible on top of the ground-floor commercial uses." *Id.* S-11

Policy 6.1.2 of the Plan states: "Encourage the redevelopment of the Church and Market Street Safeway site with a mix of housing and commercial uses, supportive of Church Street's importance as one of the city's most well-served and important transit centers and integrated into the urban character of the area." The Plan goes on to say (Plan, p. 156) that "[a]ny proposal for reuse of the site should strive to accommodate the supermarket's continued operation and meet the following goals: S-12

- Build to the street wall along Market and Church Streets, at a height appropriate for a street of its scale.

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[3] The Plan's inclusion of the Property to begin with seems somewhat disjointed and overreaching in that the impetus for the Plan was the passage of Proposition E. Plan, p. 12. Proposition E called for the removal of the Central Freeway and construction of a new Octavia Boulevard. The Property is not located on or in the direct vicinity of the former Central Freeway parcels. Thus, removing the Property from the Plan would not in any way impede the goals behind or purpose of the Plan.

[4] *See*, Objective 6.1 ("New Development on the Central Freeway Parcels and the Market Street Safeway Site that Heals the Physical Fabric of the Neighborhood and Adds to its Character and Quality"); *see, also*, Plan, p. 154 ("The Market Street Safeway site is another important opportunity site, where new housing above revitalized ground-floor commercial activities will strengthen the area. . . . If designed well, new development on both the Central Freeway parcels and the Market Street Safeway will greatly enhance the vitality and character of the Market and Octavia neighborhood.").

- In keeping with the development pattern of the area, integrate the supermarket into a mixed-use program for the site, including a significant amount of housing on upper floors.

The Plan sets forth a mixed-use redevelopment strategy for the Property whereby the existing 63,480 square foot store would be replaced with a 38,000 square foot store (inexplicably resulting in a far smaller store) and 185 new housing units along with other retail. *See*, Plan, p.157. Such substantial change in the present land use on the site would be accomplished via a tortured, unviable series of construction phases, including the building of a temporary parking structure. *Id.* According to the Plan, ***this strategy "should be considered as part of any proposal for new construction, addition or extensive remodeling on the Church and Market Safeway site."*** Plan, p. 156 (emphasis added). In practical terms, this could mean (depending on the ultimate language of implementing Planning Code provisions) that interior remodeling of the Safeway store or associated retail shops would trigger mandatory redevelopment of the Property in accordance with the Plan.[5] As discussed below, the Plan's proposal for the Property — in the abstract alone, but even more so if such redevelopment is mandatory — does not comport with legal mandates and should be altered or discarded before the EIR is begun. S-12

B. CEQA requires that any alternative studied in an EIR (including the proposed project) be feasible, meet the basic objectives of the project, and be reasonable.

Public Resources Code § 21100 requires that an EIR contain a detailed statement setting forth "[a]lternatives to the proposed project." As explained below, the very specific provisions of the CEQA Guidelines, together with abundant case law on the topic, define the universe of criteria for permissible alternatives. As a result, an EIR may only examine alternatives that are feasible, reasonable and will satisfy the basic objectives of the proposed project. Naturally, the proposed project must satisfy these same legal criteria. All alternatives considered and weighed against each other in an EIR, including the option of the proposed project, must pass the tests of feasibility, reasonableness and ability to meet the project objectives.[6] S-13

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[5] Please be aware, though, that any such Draconian regulatory framework would be legally deficient if it were more stringent than the non-conforming use provisions that apply to other properties within the City. *See*, Planning Code §§ 180 et seq.

[6] Most discussion of the criteria applicable to alternatives centers around alternatives other than the proposed project. The obvious reason for this is that most EIRs are prepared for privately proposed development projects. Thus, the "project" studied in an EIR will generally meet the relevant criteria for alternatives since the proposal has been developed by the very individual or entity that will implement it and whose economics are affected by the project. In such a situation, the lead agency under CEQA must develop the range of alternatives to be included in the EIR, and must be guided by the feasibility and other factors discussed herein. In an instance such as this where the "project" for the EIR is a land use plan developed by the lead agency itself, and not by the affected property owners, the very formulation of the "project" for the EIR is subject to the same standards as the formulation of alternatives for the EIR.

CEQA Guidelines § 15126.6(a) specifies:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain ***most of the basic objectives of the project*** but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. ***Rather it must consider a reasonable range of potentially feasible alternatives*** that will foster informed decisionmaking and public participation. ***An EIR is not required to consider alternatives which are infeasible.*** (emphasis added)

CEQA Guidelines § 15126.6(c) likewise provides:

> ***The range of potential alternatives*** to the proposed project ***shall include those that could feasibly accomplish most of the basic objectives of the project*** and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. ***The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.*** Additional information explaining the choice of alternatives may be included in the administrative record. ***Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility,*** or (iii) inability to avoid significant environmental impacts. (emphasis added)[7]

S-13

See, also, Kostka & Zischke, *Practice Under the California Environmental Quality Act* § 15.9 ("When selecting alternatives for an EIR, the lead agency's task is to identify a range of alternatives that will satisfy basic project objectives while reducing significant impacts. Alternatives that are not at least potentially feasible are excluded at this stage because there is no point in studying alternatives that cannot be implemented or that will not succeed."); *id.* at § 15.25 ("CEQA is concerned with concrete alternatives that will actually provide an alternative means of carrying out the project. It is not concerned with unrealistic, hypothetical alternatives.").

As noted, the determination of whether an option is "feasible" is fundamental to the process. CEQA Guidelines § 15364 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." *See, also,* CEQA Guidelines § 15126.6(f)(1) (emphasis added):

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[7] In addition, noted CEQA commentators have observed that a fourth category of reasonableness should be added to this list in accordance with case law. Kostka & Zischke, *Practice Under the California Environmental Quality Act* § 15.10.

> Among the factors that may be taken into account when addressing the feasibility of alternatives are **site suitability, economic viability**, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), **and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)**.

These concepts are borne out time and again in case law. The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553, 574 (1990), acknowledged that ownership or control of property may decidedly affect the choice of alternatives to examine in an EIR. ("Surely whether a property is owned or can reasonably be acquired by the project proponent has a strong bearing on the likelihood of a project's ultimate cost and the chances for an expeditious and 'successful accomplishment.'")

In *Save San Francisco Bay Association. v. San Francisco Bay Conservation Commission*, 10 Cal.App.4th 908 (1992), involving development of the aquarium project at Pier 39, petitioners challenged the EIR for failing to describe an alternative waterfront site that would not require placing any new fill in the bay. The Court upheld the EIR, noting that the lead agency/City had undertaken a comprehensive analysis of numerous alternative sites for the project:

> . . . [T]he City did not default in its responsibility to the public or to BCDC to consider a full range of alternatives. As we have seen, in Citizens of Goleta Valley v. Board of Supervisors, supra, 52 Cal.3d 553, the Supreme Court stressed that **the range of alternatives to be included in an EIR should focus on those that could "feasibly" attain the basic objectives of the project**, and that **CEQA does not require the examination of alternatives that are so speculative, contrary to law, or economically catastrophic as to exceed the realm of feasibility**. This principle is important for this case because the requirements for the aquarium project were very specific and limited in scope (waterfront access, proven attendance base, transportation and parking), which in turn severely limited the 'feasible' alternatives.

S-13

Id. at 922 (emphasis added). *Accord, Bowman v. City of Petaluma*, 185 Cal.App.3d 1065, 1084 (1986) (evidence in record that alternative of building new arterial road to serve housing project could not be justified economically and would substantially delay project justified exclusion as infeasible alternative); and *Marin Municipal Water District, supra*, 235 Cal.App.3d at 1666 (EIR properly rejected various suggested alternatives as infeasible given economic, environmental, and technological factors involved).

The alternatives discussed in an EIR (including the so-called "project") must also be reasonable in nature in order to foster meaningful environmental analysis. CEQA Guidelines

§ 15126.6(a). Thus, an EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative. *See*, CEQA Guidelines § 15126.6(f)(3); *see, also*, *Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School District*, 24 Cal.App.4th 826, 845 (1994) ("An EIR does not have to contain the results of unfruitful investigations or pursuits down blind alleys, but only an analysis of those alternatives necessary to permit a reasoned choice."). An alternative may be found to be remote and speculative if it is unlikely as a practical matter to be carried out within the reasonable future or is contingent on the occurrence of uncertain future events. *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners*, 18 Cal.App.4th 729, 745 (1993); *Bowman v. City of Petaluma*, supra, 185 Cal.App.3d at 1084. For instance, a lead agency may conclude that an alternative is remote or speculative if significant changes in governmental policy or legislation are necessary to carry it out. *Residents Ad Hoc Stadium Committee v. Board of Trustees*, 89 Cal.App.3d 274, 286 (1979).

S-13

C. In order to pass legal muster, the Plan's redevelopment proposal for the Property must be eliminated or substantially altered.

Based on the foregoing, the proposed redevelopment strategy for the Property should be eliminated from the Plan and rejected from detailed consideration in the Project EIR because it fails all of the legal tests articulated above. Specifically, the Plan's proposal for the Property is impermissible for each of the following reasons, any one of which would be sufficient to dismiss the option: (1) it is infeasible, (2) it would not meet the basic Project objectives, and (3) it is unreasonable. Though the infallible elements of the proposal are almost too numerous to list, the following points demonstrate many times over how the proposal is infeasible, unreasonable and would not satisfy the Project objectives:

S-14

Potentially Mandatory Nature of Proposal. According to the Plan, the proposed redevelopment strategy "should be considered as part of any proposal for new construction, addition, or extensive remodeling" of the Property. Plan, p. 156. This could mean that a small addition to one of the retail uses, or even interior remodeling, could trigger a requirement for the entire Property to be redeveloped in accordance with the Plan.[8] Clearly, such a hard and fast requirement provides no incentive to build housing, and would merely serve as a disincentive to beneficial maintenance and continued investment in the retail structures and uses on the Property. Particularly since the redevelopment strategy outlined in the Plan is infeasible (for myriad reasons detailed below), such mandatory requirement would itself ensure that the Project objectives — to "maximize housing opportunity" and "[s]trengthen neighborhood-serving retail and services" — will not be met. If a minor modification to the Property were to trigger the Plan's redevelopment strategy, Safeway and its fellow retailers may be forced to choose not to

[8] It strikes us that any such mandatory redevelopment regulatory scheme not only flies in the face of the permissive land use regulatory provisions that apply throughout the remainder of the City (raising equal protection and due process concerns), but attempts to mirror a redevelopment plan without adhering to the stringent procedural and substantive requirements that pertain to redevelopment plans under state law. *See*, Health and Safety Code § 33000 et seq.

remodel or upgrade any element of the existing neighborhood-serving retail center. Obviously, this would not advance the City's objectives either of providing housing or of strengthening essential neighborhood retail services. Moreover, in the long run, it could lead to blighted conditions, which generate their own set of potential environmental issues. *Cf.* CEQA Guidelines § 15064(d),(e); *Citizens Association for Sensible Development of Bishop Area v. County of Inyo*, 172 Cal.App.3d 151, 169-171 (1985) (agency failed to consider potential environmental impacts of proposed shopping center and loss of patronage for existing businesses that might result in physical deterioration of the downtown area); *Citizens for Quality Growth v. City of Mount Shasta*, 198 Cal.App.3d 433, 446 (1988) (EIR should consider whether potential economic problems caused by project could result in business closures and physical deterioration of downtown area). Naturally, to the degree that the Plan threatens the future viability of the retail enterprises on the Property (including the grocery store and other uses), forcing the large number of nearby resident patrons to drive further for essential needs, traffic and air quality will worsen; the EIR should address these issues. S-14

Lack of Property Ownership. The Plan overlooks the fact that the Property is not owned by Safeway, but rather by multiple parties, leased to Safeway under numerous leases. In turn, Safeway is bound as a lessor to leases with the shop space tenants, and cannot disrupt its tenants' rights to those retail spaces. This ownership structure means that Safeway cannot simply elect to construct housing in conjunction with store renovation or expansion activities. Not only is there little to no incentive for the underlying owners (or the retail tenants) to consent to such a project, but most housing developers would be unwilling to build housing on leased land, and financial institutions would be unable and unwilling to finance such projects. Moreover, general plan and zoning changes cannot (and, practically, will not) force the hand of underlying owners and cause them to agree to extended or different lease provisions or to selling their lands to allow mixed-use development. Furthermore, because the Property consists of multiple, oddly-shaped parcels, the Plan's redevelopment strategy would not be allowed under applicable law (including the Uniform Building Code) unless the parcels were merged so as to avoid buildings straddling property lines. Particularly given that the parcels that comprise the Property are owned by different entities, any such prerequisite merger is both practically infeasible and legally impermissible. These substantial hurdles alone make the Plan's redevelopment strategy infeasible and unreasonable, and demonstrate that the objectives of the Plan will not be satisfied. S-15

Recent Redevelopment of the Property. The Plan's redevelopment strategy is inexplicably oblivious to the fact that Safeway in 1998 completely renovated the Market Street Safeway Store and associated retail shops. Indeed, over the course of the last six years, Safeway has spent approximately $14 million to upgrade its store and the Property, primarily in connection with the grocery store expansion and construction of adjacent retail shops in 1998. The buildings on the Property have been seismically upgraded and are in substantial compliance with all current building codes. Generally, commercial buildings such as those on the Property have a useful life of 50 years. Clearly then, demolishing the existing, recently remodeled store S-16

and adjacent shops to build a smaller store beneath and adjacent to new housing units would not represent a prudent business decision[9] and is in no way economically viable.

Smaller Store. The Plan envisions that Safeway would spend millions of dollars to demolish a 63,480 square foot store and replace it with a 38,000 square foot store. While, as noted, Safeway supports mixed-use projects and regularly considers whether its sites to be remodeled are candidates for housing over retail, Safeway is primarily in the grocery business. Particularly as grocery needs continue to expand and to demand larger stores with full-service departments, multi-cultural foods and wider aisles to accommodate persons of limited mobility, Safeway would never accede to demolishing a store to replace it with a smaller store. As mentioned above, the Market Street Safeway was only recently renovated at its current size, and such size is critical to the function of the store to serve established needs of the community. Plainly, any proposal that entails a smaller store is flatly infeasible and must be discarded. In addition, such a drastically smaller store and the likely loss of the existing retail shops, as envisioned by the Plan, would force the substantial number of neighborhood patrons to look elsewhere for fulfillment of their essential shopping needs. The EIR should analyze the resulting inevitable traffic and air quality impacts. S-17

Inadequate Commercial Parking. The Plan's replacement of parking requirements with extraordinarily low parking maximums further underscores its infeasibility. The Plan would allow for a maximum of 1 parking space per 2,500 square feet of commercial development. Plan, p. 24. To the extent that this standard were applied to the Property, this would result in a total of 15.2 parking spaces for the proposed inadequate 38,000 square foot store. By comparison, the existing 69,780 square feet of retail space on the Property are currently served by 217 parking spaces. It goes without saying based on observations at the existing Safeway store (more than verified by even passing knowledge of every other grocery operation in the City) that a grocery store simply must have sufficient parking to support its customers' needs. Otherwise, confusion and gridlock will reign, and significant traffic and air quality impacts will result. Plainly, a mere 15 parking spaces could not possibly support a grocery store. Even if the Property were redeveloped with 250-300 parking spaces, as indicated on page 157 of the Plan, parking for the grocery use would be inadequate. Assuming that 250 spaces were provided and that 139 spaces were devoted to the residential units (.75 spaces per unit, as discussed below), only 112 parking spaces would be available for Safeway (not even factoring in any parking for other retail uses on the Property). This would be insufficient to meet proven demand. These parking deficiency issues make the Plan's proposal for the Property undeniably infeasible and unreasonable, and at odds with the Project objective to strengthen neighborhood-serving retail. S-18

Inadequate Residential Parking. Further compounding the problem, no parking minimum would be required for the proposed 185 new residences. While existing Neighborhood Commercial regulations throughout the City require that 1 parking space be provided for each S-19

[9] As you are no doubt aware, Safeway, Inc. is a publicly traded corporation that owes a fiduciary duty to its shareholders. Therefore, Safeway cannot merely decide to tear down a recently-constructed, productive shopping center into which substantial company funds were invested.

housing unit, the Plan proposes that a maximum of a mere .75 spaces per unit would be conditionally permitted. Plan, p. 24. Not only is this residential parking ratio far too low, but such a regulatory scheme would give decision-makers the discretion to require that absolutely no parking be provided for the residential units. This is unacceptable. Inevitably, residents and grocery patrons would be forced to compete for the few spaces, and the viability of the grocery store would be further jeopardized by the incursion of residential cars in the grocery parking spaces. This is yet another reason that the Plan's proposal for the Property is infeasible and will hinder, rather than further, the stated objectives of the Plan. S-19

No Visible Grocery Parking. Based on experience, Safeway has determined that in order for a grocery store to flourish in a mixed-use context where most of the parking for the store is within a structure, at least 30 parking spaces must be provided at grade outside the parking structure to entice customers in and assure them that parking is available. The Plan fails to include this important physical component to success, making the Plan's proposal infeasible. S-20

Expensive Construction/Staging Plan. The Plan sets forth a five phase construction plan for implementation of the proposal on the Property. That plan includes construction of a temporary three level garage to serve Safeway while a portion of the remainder of the site is redeveloped. To begin with, any economically viable redevelopment of a grocery store to a mixed-use project will generally necessitate closure of the existing store during construction, leaving area residents with no grocery store for an extended period. Furthermore, a construction concept such as that outlined in the Plan would eliminate all economies of scale (with its five phases, it would really be five separate projects), and the temporary garage would be far too costly to be justified. For this reason alone, the Plan's redevelopment strategy is not feasible, nor will it satisfy Project objectives. S-21

Remote and Speculative Plan. For the reasons outlined above, implementation of the Plan's redevelopment strategy could aptly be described as remote and speculative. Further, as a practical matter, it is unlikely to be carried out within the foreseeable future and is contingent on the occurrence of uncertain future events. In addition, significant changes in government policy and legislation would be necessary to carry out the reuse strategy. Given these facts, as indicated by the cases cited above, the redevelopment strategy is unreasonable and should be eliminated from further consideration. S-22

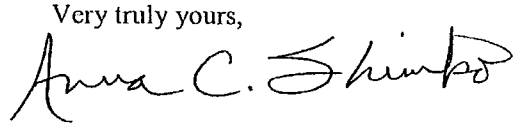
****

In closing, Safeway appreciates the opportunity to comment on the scope of the Plan EIR. As we have mentioned, Safeway very much supports the concept of mixed-use development where such projects are feasible. Safeway is committed to partnering with the City to promote mixed-use development opportunities if we can agree on a regulatory framework that will encourage, but not require, mixed-use development where it is viable. As amply illustrated above, however, the Plan's proposed redevelopment strategy for the Market Street Safeway site is not viable. For the multitude of reasons detailed above, any one of which would suffice to make the proposal an impermissible alternative, the Plan must be altered to eliminate all S-23

reference to the Property before the EIR process is begun in earnest. If the City insists on studying a proposal for the Property within the Plan and associated EIR, the inaccurate data in the Plan must be corrected and any such redevelopment proposal must be dramatically modified from its current form (with participation by Safeway) to be a reasonable, feasible alternative consistent with the comments and concerns outlined herein. S-23

Representatives from Safeway will attend the November 18th scoping meeting. In the interim, please do not hesitate to contact me with any questions or comments.

Very truly yours,



Anna C. Shimko

cc: Kathleen Gallagher
Bruce Qualls
Kimberly Smith
Richard Zlatunich
Matthew Francois
Jon Billovits
Rana Ahmadi

Letter S – Anna C. Shimko, Cassidy Shimko Dawson, Attorneys at Law

S-1

The *Draft Market and Octavia Neighborhood Plan* proposes an alternative development concept for the properties where the Safeway shopping complex is located at Market and Church Streets should redevelopment of the property be undertaken in the next twenty years. The design concept includes a phased restructuring of the site with a supermarket of approximately 38,000 square feet, 185 units of housing, ground-floor retail, and 250 to 300 parking spaces. As noted by the commentor, the modifications to the draft Plan published in February 2004 did not recommend any changes to the Plan for these properties nor are any changes recommended at this time.

The intent of the Plan is to identify a design approach to the properties on the site located at the corner of Market and Church Streets that would more efficiently use the space on the site and introduce mixed uses, including a supermarket and housing with parking. The design concept for these parcels identified in the Plan would be considered in the future should any major remodeling or upgrading of the site be proposed. There are no specific redevelopment proposals for this property at this time nor are these properties located within a redevelopment area. The future of the property would be subject to these guiding policies only as modifications to the site occurred.

The purpose of the DEIR is to analyze the impacts of the proposed Plan. The Planning Department determined subsequent to the scoping process that the request to drop the design concept for the site at the corner of Market and Church Street would not be integrated into the modified Plan as it was only an illustrative concept and not a specific design proposal. Therefore, the changes requested on behalf of the Safeway store are not analyzed in the DEIR. Any major renovations to this site in the future would be the subject of a collaborative effort between the property owners and the Planning Department and would be subject to independent environmental review at a project level. The Planning Department has already met with representatives from Safeway and continues discussions with them to ensure that the final Plan language is clear on the intent of the Plan for the future of this parcel.

S-2

The reintroduction of housing to the site at the corner of Market and Church Street would be

feasible if major redevelopment of the site were proposed by the property owner, not if minor modifications to or remodeling of the existing buildings and businesses were proposed. The intent of the Plan is to direct change over time in the neighborhood, not to restrict improvements to properties with the intent of seeing them fall into disrepair. It would be considered beyond the scope of an EIR to attempt to conjecture whether property owners would in the future choose not to maintain their properties, thereby allowing them to become blighted.

The design concept presented in the Plan does not assume that Safeway is the property owner and has the power to redevelop this site. The property owner(s) would make the determination as to whether they chose to aggregate property to increase the density on the site and at what point in time that might be economically feasible given the recent investments in renovating the Safeway store and the rest of the shopping complex. The policy guidelines provided in the Plan are intended to provide some direction for future private investment on these properties.

As noted under Response to Comment S-1, the Planning Department reviewed the request made on behalf of Safeway during the scoping process to remove the design concept for the property and chose not to incorporate the request as part of the Plan modifications published in February 2004.

S-3

See Response to Comment C-1 regarding future parking demand and Response to Comment S-6 regarding air quality impacts.

The DEIR did analyze the traffic impacts (pages 4-212 to 4-223), air quality impacts (pages 4-252 to 4-260), and noise impacts (pages 4-268 to 4-277) associated with the implementation of the Plan. The impacts associated with a reduction in the parking requirements was assessed on pages 4-230 through 4-238 of the Transportation Section. The analysis compares the parking impacts associated with the parking minimums and maximums as proposed in the Plan with the conditions that would exist should the development occur using the existing code requirements for residential parking (see Tables 4-25 and 4-26 on pages 4-232 and 4-233). As no new employment growth was projected for the Project Area, no major changes in parking conditions related to employment are assessed.

San Francisco does not consider parking supply as part of the permanent physical environment as

parking conditions are not static, varying by time of day, time of week, and time of year as people change their modes and pattern of travel. Parking deficits are considered to be social effects rather than physical impacts as defined by CEQA. Under CEQA a project's social impacts need not be treated as significant impacts on the environment. The circling of cars to find parking may lead to secondary physical impacts such as traffic congestion, air quality, safety, or noise impacts (see page 4-204 of DEIR for the significance criteria used in the assessment of parking impacts). These impacts have been taken into account in the transportation, air quality, and noise analyses assuming that all cars would come directly to their site and then move away in search of parking. This effect would be offset by a shift to other modes when parking is in short supply.

According to the significance standards adopted by the City and County of San Francisco, "the social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion." The secondary impacts associated with the circling of cars in search of parking, as identified above, are analyzed in the DEIR and the impacts were not found to be significant, therefore, the DEIR does not need to mitigate the effect of changes to the off-street parking requirements proposed by the Plan.

The predominant noise source in the community is traffic noise. Future noise contour mapping shows very little change in background sound conditions between traffic level of service 'C,' 'D', or 'E', such as along Market Street. Once traffic is slowed to these levels, the effects of tire and engine sound emissions diminish, offset by additional horn honking, etc. The change in off-street parking standards is not the sole contributor to the change in level of service and therefore is not a predominant cause for significant changes in ambient sound levels.

Elimination of the open parking lot at Safeway would in fact have some minor mitigative effects as the density of building construction along a major thoroughfare, such as Market Street, acts as a noise barrier to residences on the backside of the buildings in areas of less dense traffic. The overall effect of these changes on noise conditions is considered minimal.

S-4

The DEIR does present mitigation measures to reduce the significant impacts associated with the

Plan. However, in some cases, the impacts would be considered significant and unavoidable, since no feasible mitigation measures could be identified. In other cases, mitigation measures have been proposed, but their implementation could potentially result in secondary impacts; therefore, detailed additional analysis would be necessary before these measures could be adopted.

Subsequent to the DEIR, additional review of Mitigation Measures 5.7.B, 5.7.G and 5.7H was conducted (see Response to Comment L-3). As such, the potential for a significant and unavoidable impact would still exist if these mitigation measures were implemented.

S-5

See Responses to Comments R-20 and AA-65 regarding the development of alternatives.

S-6

The evaluation of potential air quality impacts, which could result due to the implementation of the *Market and Octavia Neighborhood Plan* was performed in accordance with Bay Area Quality Management District guidelines (*BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999). The District is the agency primarily responsible for assuring the national and State ambient air quality standards are attained and maintained in the San Francisco Bay Area. For the Plan, there are two main potential sources of air emissions that may impact air quality, construction activities and vehicle emissions. Vehicle emission may impact local air quality through carbon monoxide emissions or regional air quality through emissions of reactive organic gases (ROG) that for ozone or fine particulate matter (PM10 and PM2.5). No stationary sources of air emissions are identified within or in close proximity to the Project Area.

The air quality impact due to construction-related emissions that is of primary concern to the District is PM10 and is generally short-term in duration. There are a number of feasible control measures that can be reasonably implemented to significantly reduce PM10 emissions. The District's approach to CEQA analyses of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions. The DEIR presents mitigation measures in Section 5.8.A., page 5-19, which conform to the PM10 control measure identified by the District as being effective. The District's policy is that if the recommended control measures are implemented, then air pollutant emissions from construction

activities would be considered a less than significant impact. In addition, Section 5.8B, page 5-20, also identifies mitigation measures to reduce short-term exhaust from construction equipment.

To evaluate the local air quality impact due to vehicle emission associated with implementation of the Plan, an estimate of the carbon monoxide concentrations at 14 major intersection was performed in accordance with the California Department of Transportation guidance document, Transportation Project-Level Carbon Monoxide Protocol, December 1997, using a computer modeling program, CALINE4, developed and maintained by the California Air Resources Board (CARB). Traffic projections from the traffic study performed for this project and vehicle emission rates from CARB's EMFac2002 computer program are used as inputs to the modeling. The modeling indicates that under current conditions, the 8-hour average carbon monoxide concentrations at five major intersections may exceed national and State ambient air quality standards. However, the estimated carbon monoxide concentration in 2025 with the Plan implementation would be well below the national and State ambient air quality standards. Therefore, implementation of the plan would not have a significant impact on the local air quality (see page 4-257 of the DEIR). .

To evaluate the regional impact to air quality, the State CEQA Guidelines requires that CEQA evaluations of plan impacts, such as the *Market and Octavia Neighborhood Plan*, discuss the Plan's consistency with the local Air Quality Management Plan. For the Bay Area District, this is the *Clean Air Plan* (CAP). The purpose of this requirement is to ensure that future developments do not impede the air quality improvement or maintenance goals set by the District. Implementation of the Plan is not expected to cause an increase in the population growth rate beyond what was assumed in CAP emission projections and the Plan includes traffic control measures in accordance with the CAP's strategy to reduce regional ozone levels. The evaluation demonstrated that the Plan was in conformance with the CAP and therefore would not have a significant impact on regional air quality (see page 4-255 of the DEIR).

S-7

As required under California Water Code 10910 and CEQA Guidelines (15083.5), a water supply assessment was received from SFPUC on February 1, 2006 (see letter on the following page) indicating that its total project supplies are adequate to meet incremental demand associated with the

SFPUC
WATER
WASTEWATER
POWER

SAN FRANCISCO PUBLIC UTILITIES COMMISSION
OFFICE OF THE ASSISTANT GENERAL MANAGER – WATER ENTERPRISE
1155 Market Street, 11th Floor, San Francisco, CA 94103 • Tel. (415) 934-5787 • Fax (415) 934-5751

February 1, 2006

Rana Ahmadi
Citywide Policy Planning
1660 Mission Street, #500
San Francisco, CA 94103

Re: Market Octavia Water Supply Assessment

Dear Ms. Ahmadi:

I am writing in response to your email dated January 9, 2006 regarding whether the Market Octavia Area Plan would result in a major expansion of water facilities.

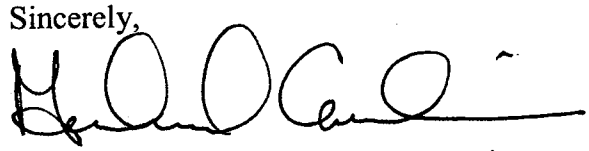
SFPUC staff has evaluated your estimates of projected water use resulting from the proposed project. The SFPUC 2005 Urban Water Management Plan Update (UWMP) projects water use in the City and County of San Francisco through year 2030. The water use projections are related to population and business trends forecast by the Association of Bay Area Government's (ABAG's) Projections 2002 as well as San Francisco's city future development provided by City Planning in its Land Use Allocation (LUA) 2002. The LUA 2002 is a forecast of a total 25-year city-wide growth expected in San Francisco.

We consider the Market Octavia Area Plan cited in your email to have minor variations with the planning estimates in the 2005 UWMP. The Market Octavia Area Plan is a subset of the total city-wide LUA 2002 estimates. Despite the slight variations of household and employment growth in the Market Octavia Area Plan, it is assumed that with the regular five year updates of the UWMP verifications of accurate projections will be conducted and adjustments made accordingly. Additionally, the 2005 UWMP forecasts flat water demand in San Francisco through the year 2030 as a result of plumbing code savings and that the growth under the City's general plan and specific area plans will not change this estimate.

Therefore, the SFPUC has included the water demands associated with the proposed project in future water demands for the City and County of San Francisco. The 2005 UWMP provides plans to meet the City and County of San Francisco's future water demands. The proposed project will not result in a major expansion of the water utility system.

Please feel free to contact Paula Kehoe, Manger of Water Resources Planning, with any further questions or concerns at (415) 554-0792.

Sincerely,



Michael Carlin, AGM Water Enterprise

cc: Paula Kehoe, San Francisco Public Utilities Commission
Ellen Levin, San Francisco Public Utilities Commission
Josh Milstein, City Attorney

proposed Plan.

S-8

Comment regarding the infeasibility of the Plan's proposed redevelopment strategy is noted. See Responses to Comments S-1 and S-2 for a discussion of the redevelopment strategy included in the Plan for the Safeway site.

The Planning Department has determined that they would not make any changes to the design concept for the site at Market and Church Streets as the concept is intended only as a guide for changes to the site in the future and would not be implemented unless major renovation of the site was undertaken by the property owners.

S-9

See Response to Comment S-1 regarding the requested changes to the Plan. The errors noted in the existing footprint for the Safeway building would not invalidate the impact analysis that was conducted for the Plan, as a whole, as the design concept did not change. The purpose of the DEIR is to analyze the impacts of the proposed Plan. The Planning Department determined subsequent to the scoping process and after meeting with the Safeway representatives that the request to drop the design concept for the site at the corner of Market and Church Street would not be integrated into the modified Plan because it was only an illustrative concept and not a specific proposal. Therefore, the changes requested on behalf of the Safeway store are not analyzed in the DEIR. Any major renovations to this site in the future would be the subject of a collaborative effort between the property owners and the Planning Department and would be subject to independent environmental review at a project level.

S-10

See Response to Comment S-2 regarding the potential redevelopment of the Safeway site.

S-11

Comment regarding the elements of the Plan relevant to the Safeway site is noted.

S-12

See Response to Comment S-2 regarding the potential redevelopment of the Safeway site. The design concept for the Market and Church site is not mandating redevelopment of the site. It is providing guidelines for future redevelopment of this site, among others, should major remodeling of the existing buildings be undertaken by the property owners in the future. The DEIR analyzes the design concept at a general level and future development on the site would be subject to independent environmental review when a specific proposal has been developed for the site.

S-13

Comments regarding the analysis of alternatives to the proposed project are noted. See Response to Comment R-1 for a general discussion of alternatives analysis and Response to Comment R-20 for a discussion of alternatives development specific to the *Market and Octavia Neighborhood Plan* DEIR.

Alternatives to the Plan which reduced the density and the heights of the project area are evaluated as part of the DEIR. The Planning Department determined that they would not consider additional alternatives to the site at Market and Church because the design concept presented in the Plan was intended to be illustrative only and is not a specific development proposal. The analysis for the DEIR was done at a program level and the design concept for the site provides only general guidance should future redevelopment occur.

S-14

See Response to Comment S-2 regarding the potential redevelopment of the Safeway site.

S-15

See Response to Comment S-2 regarding the potential redevelopment of the Safeway site.

S-16

See Response to Comment S-3 regarding the assessment of impacts associated with the reduction of parking in the Project Area.

S-17

The Plan does not advocate that Safeway spend millions of dollars to demolish the existing store and

replace it with a smaller store. The design concept does suggest that if major renovation of the site is undertaken in the future, an alternative to the current design would be to place a supermarket directly adjacent to the street and introduce mixed uses to the site. The smaller store is provided as an example of the type of development that might occur on the site should a decision be made in the future to redevelop the site with a different approach that is more transit-oriented.

S-18

See Response to Comment S-3 regarding the assessment of impacts associated with the reduction of parking in the Project Area. There are other supermarkets in San Francisco, for example, the Safeway on Jackson Street, that were built as part of mixed-use developments without independent parking supplies. This development prototype is appropriate in densely developed areas where trips to the grocery store are frequent and are made primarily on foot or by transit. This is the type of development that is advocated in the Project Area.

S-19

The Plan proposes that the Project Area be developed as a transit-oriented neighborhood that relies on transit, walking, and biking for mobility more than the private auto. To accomplish this goal, the Plan advocates a reduction in parking requirements. To provide an understanding of the potential impacts of this parking reduction, the DEIR analyzes the impacts of providing parking at a level proposed by the Plan and at a level that would be required should the existing code regulations remain in place for comparative purposes. The analysis also considers the difference in parking impacts if auto ownership was reduced as would be expected by implementation of the policies of the Plan versus if it remained at the levels that are usually assumed for new development in the City (see pages 4-230 through 4-238). It is noted that the commentor disagrees with the parking reduction policies proposed in the Plan.

S-20

See Response to Comment S-19 regarding the reduction in parking requirements proposed by the Plan.

It is noted that the commentor advocates a greater amount of parking, including some surface parking, for successful operation of a Safeway store at this site in the future. The Planning

Department reviewed these comments as part of the scoping process and made a determination not to incorporate these recommendations into the Plan. As the Plan is intended to provide general guidance for future development in the Project Area, there would be an opportunity to collaborate with the Planning Department and possibly incorporate needs specific to a Safeway store should the property owners decide to redevelop the site in the future for mixed-uses with a supermarket and housing. Any specific proposal for redevelopment on this site would be subject to review by the Planning Department and its own independent environmental review.

S-21

It is noted that the commentor disagrees with the phasing plan of the conceptual design that is presented in the Plan. Construction phasing and the determination of whether the existing Safeway store could remain viable during the development of a second store on the site would be the subject of a future specific development proposal, but supermarkets have continued to operate on sites where the store is being relocated within the shopping complex. The conceptual phasing was intended to identify a phasing plan that allowed such continuous operation of the Safeway store. The cost of building a temporary parking structure may, however, not be economically viable, given the cost of structured parking and the resources required for such a project. As previously noted, any specific development proposal for the site at Market and Church Streets would need to be developed in collaboration between the property owners and the Planning Department at such time the property owners deems it appropriate.

S-22

The design concept for the site at Market and Church Streets, as proposed in the Plan, is a long-term development strategy for the site as there are no specific plans by the property owner or the City to redevelop the property at this time. The commentor is correct in noting that significant changes in policy would be required to implement the *Market and Octavia Neighborhood Plan.* That does not, in itself, make the long-range vision of the Plan unreasonable. The intent of the EIR is to analyze the impacts of the proposed policy changes so that the decision-makers in the City can determine whether they wish to take action to adopt the Plan and put the proposed policies in place.

S-23

Comment requesting an alternative development concept for the Safeway site that is consistent with

the current land uses on the site is noted. After reviewing the scoping comments, the Planning Department determined that they would not consider alternatives to the site at Market and Church because the design concept presented in the Plan is intended to be illustrative only and is not a specific development proposal. The analysis for the DEIR is done at a program level and the design concept for the site provides only general guidance should future redevelopment occur.

GOODWILL INDUSTRIES
of San Francisco, San Mateo & Marin Counties

Tuesday, August 09, 2005

Rana Ahmadi, Chief Environmental Review Officer
City & County of San Francisco
City Planning Department
30 Van Ness, 4th Floor
San Francisco, CA 94103

Re: Market & Octavia Draft Plan Comment

Dear Ms. Ahmadi,

Goodwill Industries of San Francisco, San Mateo and Marin Counties, Inc. owns and occupies a parcel of land located in the southeastern portion of the Market & Octavia Boulevard area. The physical addresses for that parcel are 1500, 1570, and 1580 Mission Street.

The Market & Octavia Plan calls for two different height limits (250 ft., 200 ft., and 85 ft.) on that parcel. We are recommending that the San Francisco Planning Department establish a single height limit of 250 ft. for the entire parcel. See attachment.

T-1

Thank you for the opportunity to comment on Market & Octavia portion of the Better Neighborhood Plan.

Sincerely,

Malik Looper
Director, Community & Business Services

Corporate Office & San Francisco Career Services
1500 Mission Street
San Francisco, CA 94103
Phone: (415) 575-2100
FAX: (415) 575-2170 TDD: (415) 575-2115

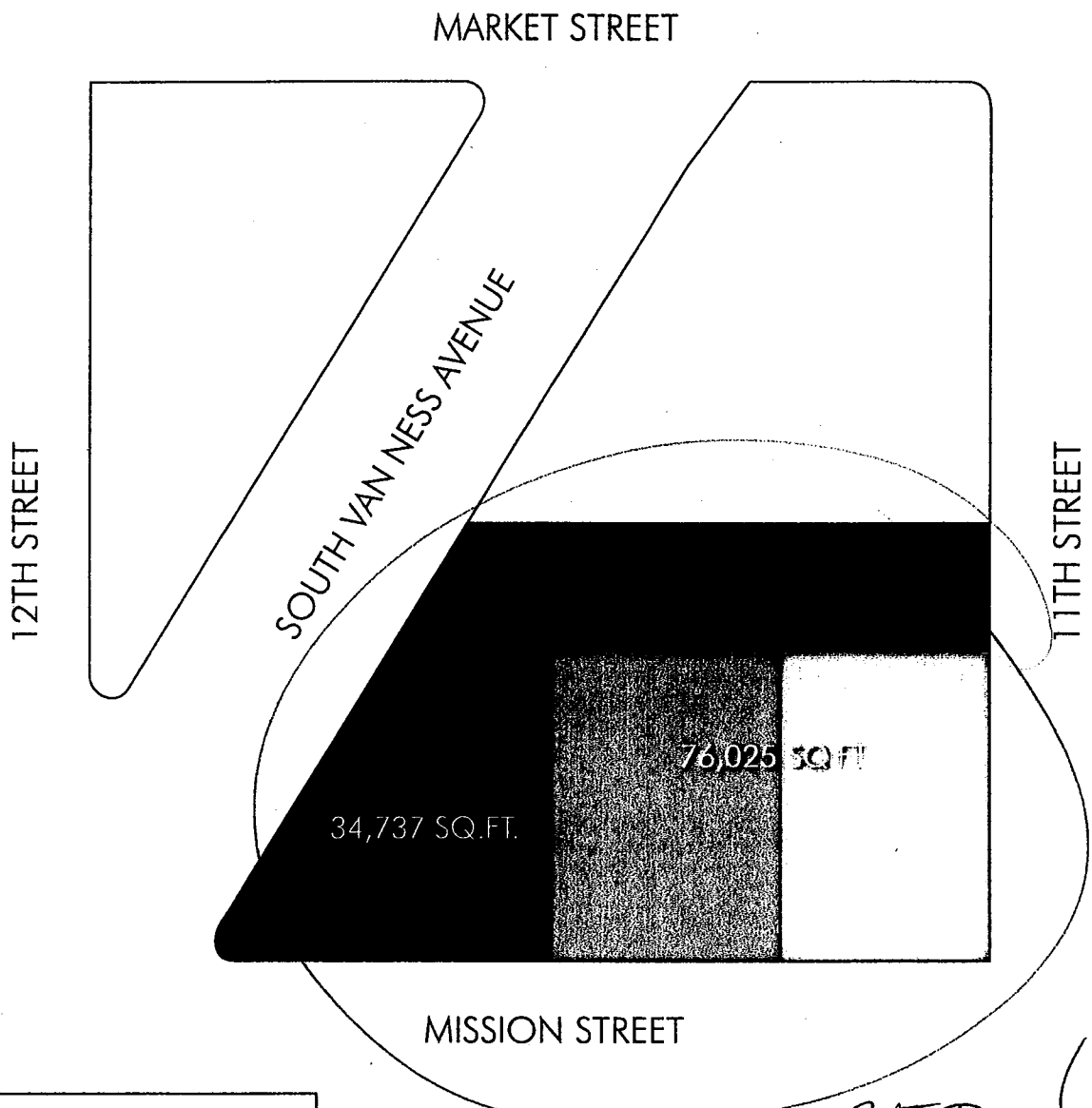
San Mateo Career Services
28 West 25th Avenue
San Mateo, CA 94403
Phone: (415) 525-2784 ext. 210
FAX: (415) 525-2789
TTY: (415) 525-2788

Marin Career Services
809 Lincoln Avenue
San Rafael, CA 94901
Phone: (415) 456-5273
FAX: (415) 456-7012

Donations: 1-888-4GOODWILL

www.sfgoodwill.org

GOODWILL SITE



Total:	110,762 sq.ft.
Zoning:	C-36 Downtown

EXISTING

Density:	1per 125 sq.ft.
Total Units:	886
Height:	120-f/200-s

MARKET-OCTAVIA:

Density:	No Restriction
Total Units:	No Restriction
Height:	85-250 feet

250 ft.
200 ft.
85 ft.

250 FT. (HEIGHT LIMIT)

FOR ENTIRE SITE
1500 MISSION ST.
1570 MISSION ST.
1580 MISSION ST.

Letter T – Malik Looper, Goodwill Industries of San Francisco, San Mateo & Marin Counties

T-1

Comment regarding the request height change is noted. The Planning Department has reviewed all of the requested changes for height designations and made a determination that this requested change would not be incorporated into the Plan because it is not consistent with the height and development patterns recommended for this area. Any requests for additional changes to specific properties will be addressed independent of the process for adoption of the Plan.

FROM: Mary Miles, #230395, and
Coalition for Adequate Review (CFAR)
364 Page St., #36
San Francisco, CA 94102
(415) 863-2310

TO: Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., Ste. 500
San Francisco, CA 94103

DATE: August 9, 2005

PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) ON MARKET AND OCTAVIA NEIGHBORHOOD PLAN
Planning Department Case No. 2003.0347E
State Clearinghouse No. 2004012118

I am a resident and taxpayer in San Francisco. Coalition for Adequate review is an unincorporated association of persons interested in assuring complete and accurate review and public input of projects affecting the environment and people in it. This Comment is submitted in the public interest. The DEIR on the "Market and Octavia Neighborhood Plan" (hereinafter "Plan") will have significant adverse impacts on the environment and quality of life of residents of the "neighborhood" it will radically alter, and portends high-rise incursion into areas where high rises do not presently exist, and in which they are completely incompatible, as well as eliminating parking and reasoned controls and restrictions on density, height, and bulk in the General Plan, Planning Code, Zoning Maps, and other Codes and ordinances.

The project area is huge, representing an incursion of unregulated development in the core and central areas of San Francisco by exempting developments from existing regulations under the aegis of claiming that several areas from east of the Civic Center to the Western Addition, to the South of Market areas and beyond are in some newly-minted "neighborhood" which the Plan coins as the "Market and Octavia Neighborhood." That heretofore unknown "neighborhood" has been condemned by the unnamed authors and proponents of the Plan to be destroyed by unregulated, full-scale, ugly modern, density development where none has previously existed. The DEIR fails to accurately describe the project, except in fictitious terms, and fails to identify and analyze the obvious adverse significant impacts on the immediate surrounds and the entire city from the Plan's sweeping proposals for giveaways of this large area to developers. U-1

This DEIR is severely flawed and falls far short of the legal requirements of the California Environmental Quality Act (CEQA), Cal. Pub. Res. Code, §§21000 *et seq.*

A. THE DEIR IS FLAWED BEYOND LEGAL COMPLIANCE UNDER CEQA.

1. **The DEIR fails to evaluate traffic and parking impacts from the "new" Octavia Boulevard on the entire project area.**

The astounding omission of any evaluation of parking impacts from the expansion of Octavia Boulevard from two to six lanes and 130 feet in width in order to accommodate ingress *and* egress to the Rte. 80 Freeway is so egregious as to render the entire DEIR absurd and invalid. U-2

The DEIR claims no significant adverse impacts will result from reducing the amount of parking required under the existing Planning Code (one parking space per housing unit); eliminating existing parking facilities; the elimination of 600 ***(six hundred)*** parking spaces when the skyway was replaced with the "new" Octavia Boulevard; raising parking rates in the Civic Center and other public garages to "downtown" rates (twice to four times the existing amounts); eliminating employee and institutional parking now provided; eliminating street residential parking permits and raising their price; eliminating access to street parking and eliminating parking on streets; increasing the price of parking meters; eliminating parking in order to establish bicycle lanes and paths, and at the same time urging massive residential and retail development in an area that is already densely populated and traveled. The DEIR makes no attempt to analyze the impacts from each and all of these and other proposals of the Project to eliminate existing and future parking. (E.g., pp. 4-230 – 4-240; Appendices.) U-3

a. ***The DEIR admits there will be severe parking shortfalls of 2,480 to 5,640 parking spaces as a result of the Project, then makes the amazing claim that causing these shortfalls is not a significant adverse impact on the environment.***

The DEIR makes the unsupportable claim that "parking shortfalls relative to demand are not considered significant environmental impacts in the urban context of San Francisco," but are merely "an inconvenience to drivers." (pp. 4-236, 4-238). There is no support in CEQA or in case law for this proposition; nor may San Francisco declare itself above the law.

It is settled law that elimination and exacerbation of already-severe parking shortfalls is, on its own, a significant adverse impact on the environment. U-4

b. ***The DEIR misstates existing ("baseline") conditions, engages in pure, unsupported speculation about future demand, and makes the preposterous claim that if the Project eliminates parking, the need for parking will magically disappear. The DEIR improperly deletes the loss of parking due to the skyway demolition, and improperly includes parking facilities outside the Project area within its "baseline" description.***

With no empirical support, the DEIR makes the preposterous claim that "[w]ith the new parking requirements and reduced vehicle ownership as anticipated by the Plan," U-5

the parking shortfall of 2,480 to 5,640 would magically disappear and become a "surplus." (pp. 4-234, 4-237.) There is no support for this preposterous notion, and it has no place in the serious analysis required by CEQA in an Environmental Impact Report. [1] U-5

The DEIR makes the entirely unsupported claim that car ownership is less in the area of the Project, claiming the outdated U.S. Census from 2000 supports this claim, though it does not. The DEIR then incorporates this phony data as its "baseline" for analyzing the quantitative shortfall of parking. U-6

The DEIR leaves completely out of its "existing" or "baseline" description the fact that an estimated 600 ***(six hundred)*** parking spaces were eliminated in the project area by the demolition of the skyway, which itself is unmentioned though it is the hallmark of the entire Project. U-7

The DEIR also includes in its false "baseline" the Civic Center garage (approximately 850 parking spaces), which is not in the Project area at all, recommending huge rate increases which would penalize and significantly impact residents, visitors and workers in the Civic Center, performing arts, and Courthouse areas, along with the drastic adverse impacts on residents and visitors within the Project area. U-8

The shortfall should therefore be 3,930 to 7,090 parking spaces in the Project area if an accurate baseline is used. This is a radical, drastic parking shortfall which is, without ancillary impacts, on its own a severe, drastic, significant, adverse impact on the environment which is completely unaddressed in the DEIR. The proposed Project may not legally go forward without addressing and completely mitigating this shortfall with actual physical solutions which do not further penalize the residents and visitors to San Francisco who own, drive, and need a place to park cars. U-9

2. The DEIR is premature, because the new Octavia Boulevard freeway ingress-egress has not yet opened, and its significant adverse impacts have neither been ascertainable nor seriously evaluated. The premature release of the DEIR deprives the public of input on the significant adverse impacts to the Project area from the Octavia Boulevard expansion and freeway ingress-egress. U-10

The timing of the DEIR is transparently evasive, because it requires public comment by August 9, 2005—just *before* the opening of the new Octavia freeway ingress-egress. Thus the public is deprived of giving comment based on actual physical experience of the drastic impacts this freeway ingress-egress will create on immediate and surrounding streets. No reason is give for rushing the DEIR comment in this fashion; nor is any reason provided for the project sponsor to wait for the opening of the freeway turnoff to assess the significant impacts it will cause.

The banner of the Market-Octavia starship was the "new" six-lane Octavia Blvd. The DEIR fails to acknowledge its impacts on traffic and the impacts on traffic, parking, U-11

[1] The DEIR

air quality, noise, congestion, neighborhood transit, pedestrian travel and other obvious impacts from creating a "boulevard" that may carry 80,000 (eighty thousand) vehicles per day onto and off of the freeway. Yet there is NO analysis of any of these impacts in the DEIR. U-11

The removal of the Central Freeway off-ramp onto Fell Street has been replaced with a surface ingress-egress under construction on Octavia Street. Octavia has been expanded from two to six lanes (as wide as Geary) to accommodate a newly-constructed on- and off-ramp just south of Market. That freeway ingress-egress will serve the entire Civic Center and northern and western portions of San Francisco.

The former off-ramp moved traffic from the Freeway onto Fell St. CalTrans estimated that 40,000 cars per day used the two-lane off-ramp to Fell. It is reasonable to assume that there will now be at least twice that amount of traffic, because the "new" Octavia surface on- and off-ramp will provide both ingress and egress to and from the Freeway, as well as other traffic on Octavia. The "new" Octavia abruptly ends at an ugly median strip decorated with concrete benches, palm trees, and junk-food style children's play structures, euphemized as "Hayes Green." U-12

Yet the DEIR makes ***no*** mention of traffic impacts on Octavia, Market or any of the *lateral* streets in the area which will be impacted by cars seeking ingress-egress to the freeway.

Severe and significant adverse traffic impacts are inevitable and will affect every other aspect of the proposed project.

3. **The DEIR fails to analyze the significant impacts on the environment from increased surface traffic in the entire project area from the expansion of Octavia Blvd. to a six-lane freeway ingress-egress, and impacts on all lateral and surrounding streets.**

There is no accurate study or data within the DEIR on the impact of traffic from the newly-expanded Octavia Blvd., which is six-lanes wide and both ingress and egress to and from the freeway. Caltrans estimated traffic on the former Fell off-ramp at 40,000 cars, and with ingress and egress, it is reasonable to assume there will be more than 80,000 cars on the four lanes (of six) of the new Octavia Blvd., which will provide ingress-egress to and from the entire central, northern and western areas of San Francisco. U-13

The DEIR admits drastic, significant adverse impacts from this Project, and yet cheerleads for more development, which will cause even more traffic and other impacts. The DEIR makes no studied analysis, but merely concludes without support that the Project's development proposals will not on their own or cumulatively impact the already-severe impacts from Octavia Blvd. U-14

The DEIR further fails to analyze the impacts on traffic, including automobile, public transit, and emergency vehicles, from traffic lane elimination, parking elimination, bicycle amenities, and changes in the physical configuration of traffic and streets. U-15

The DEIR admits radical, significant impacts from degradation of LOS throughout the project area, but proposes neither accurate analyses of these impacts nor reality-based mitigation measures. In fact, the Project must not go forward because of the already-severe impacts that Octavia Blvd. has, and will, generate. U-16

4. <u>The DEIR fails to accurately assess the existing overcrowded and underserving conditions on public transit, and the Project's significant adverse impacts on public transit.</u> U-17

5.. <u>The DEIR fails to analyze the significant impacts on the environment from changing the existing General Plan, Planning Code, Zoning Maps, and other legally binding requirements to exempt developers in the Project area from existing and necessary zoning, height, bulk, density, open space, and parking requirements.</u>

The following are examples of some of the radical changes proposed in the Plan's DEIR: U-18

- Complete rezoning of the entire area to permit exemptions from existing zoning restrictions on height, bulk, density, setbacks, and open space (Plan at pp. 1-3,
- High-rise construction of **up to 400 feet** (forty stories) (pp. 1-3,
- Establishment of minimum heights (p. 1-3,
- Increased use and height reclassifications in every district and "more concentrated" in "the Van Ness Avenue/Market Street/Mission Street/South Van Ness Avenue intersection and SoMa West areas and extending out along Market and Mission Streets." (p. 1-4)
- "eliminating housing density maximums; establishing a minimum residential-to-commercial use ration of two –to-one in the DTR district; requiring housing for all building areas above the street wall height in some areas." (p. 1-4)
- "reducing residential parking requirements and establishing a maximum parking cap." (p. 1-4)
- "encouraging new accessory units in existing residential uses through additions or garage conversions, without the requirement for additional parking" (p.1-4)
- "reducing discretionary review and conditional use requirements for new housing." p. 1-4)
- requiring that "most new buildings be built to the property lines of public rights-of-way" (p.1-4)
- that "buildings facing on public spaces be articulated with strong vertical elements." (p. 1-4)
- "Special building elements such as towers would be located at intersections or near important public spaces." (p. 1-4)
- "mixed-use development" (p. 1-4)
- limitations on "use of street frontage for parking and garage access." (p. 1-4)

- limiting "garage access and parking and encourage ground floor residential uses" in the "alley network" throughout the project. (p. 1-5)
- "larger buildings on Market Street." (p. 1-5)
- "residential open space" at "upper housing levels" (p. 1-5)
- "reclaim[ing] street space for pedestrian use" (p. -5)
- traffic calming (physical obstructions to movement of traffic) (p. 1-5)
- penalizing all residents and visitors whose transportation options are automobiles by eliminating parking and efficient movement of traffic (pp. 1-2, 3, 4, 5
- limit the "amount of required on0site parking and discourage new parking facilities." (p. 1-5)
- eliminating minimum parking requirements. (p. 1-5)
- requiring "caps on the mount of parking permitted in new development to…0.25 spaces per dwelling unit." (p. 1-5)
- replacing minimum parking required for commercial uses to maximum parking caps. (pp. 1-5, 1-6)
- required changes in citywide parking policy (p. 1-6)
- requiring separate tenant leases for parking (p. 1-6)
- forbidding subsidized employee parking (p. 1-6)
- raising the price of parking in city-owned parking facilities to "encourage short-term use" (p. 1-6) U-18
- discouraging new parking facilities in the entire Plan area. (p. 1-6)
- discouraging "commuter parking" (p. 1-6)
- squeezing residents from being able to obtain Residential Parking Permits (pp. 1-6
- eliminating code requirements for independently accessible parking spaces (p. 1-6)
- restricting driveways ("curb cuts") (pp. 1-6)
- prohibiting new "curb cuts on transit preferential streets" (p. 1-8)
- pricing Civic Center parking at prohibitive "downtown rates" (p. 1-6)
- "phasing out public subsidies at garages serving institutions" (p. 1-6)
- reducing on-street parking around City Hall (p. 1-6)
- reducing parking availability at public garages including Civic Center Garage (p. 1-6)
- eliminating and/or obstructing traffic lanes with "bike lanes" on Valencia Street, Octavia Boulevard and both sides of Howard Street; demanding "bicycle parking at activity centers and new developments; an shower and locker facilities in new commercial development." (pp. 1-6, 1-8)
- installing bike lanes on both sides of Howard street (p. 1-8)
- converting Fell and Hayes Streets to two-way streets (p. 1-6)
- converting Gough to a two-way street between Market and Otis Streets (p. 1-7)
- extensive "infill" development on the 22 former Central Freeway parcels and "the parcels at the corner of Church and Market Streets (site of Safeway market) (p. 1-7)

- removing the Safeway market and "integrating the supermarket into a mixed-use development with housing," and eliminating parking (p. 1-7)
- claiming the freeway touchdown is "open space" (p. 1-8)

The DEIR makes no attempt to accurately assess or evaluate any of the significant adverse impacts from any of the above-described radical changes and violations of existing Codes and the General Plan. U-18

The impacts of incursion of high-rises and density development where these blights have never existed are dismissed only as possibly causing "wind conditions in this area." (p. 1-8). U-19

6. **The DEIR fails to analyze the significant adverse impacts from the project's introduction of high rise development into neighborhoods and areas where there have never been high rises and where high rises are incompatible with surrounding and historic structures.**

The DEIR fails to accurately describe the existing and historic character of the Project area, and its inevitable degradation by the Project's proposal to insert high-density, high-rise ugly, modern structures which will subsume the older, smaller structures that characterize the area, and will create a monolithic barrier to the aesthetic enjoyment of San Francisco from every direction. U-20

The incursion of ugly, modern density and high rise development into the western portions of San Francisco is an ill-conceived visual degradation of the entire city and its central core, which has not been analyzed or accurately described in the DEIR or the "Project Description," thus denying the public the opportunity to know and comment on it. The proposed scale, character, and architectural features of massive development proposed by the Project are incompatible with existing conditions and violate the City's "Residential Design Guidelines" and the principles of CEQA. U-21

The DEIR's omission of the obvious adverse aesthetic effects—both by creating ugly edifices throughout the area—and by blocking existing views with them, flaws the DEIR beyond legal acceptability under CEQA.

7. **The DEIR fails to analyze the significant adverse impacts from elimination of open space.**

The DEIR fails to analyze the significant adverse impacts on the Project area and the entire city from elimination of relatively open areas and filling them up with ugly, modern density residential developments. The Project and DEIR propose that heavily-trafficked median strips and bus stops are "open space"—a ludicrous alteration and dismissal of the concept, meaning and legal requirement of open space within existing Codes and the General Plan. U-22

8. The DEIR fails to analyze significant adverse impacts from growth. U-23

The DEIR fails to analyze significant adverse impacts on the Project area from growth, and does not accurately describe the magnitude of proposed development in the area. The DEIR claims that the Project will increase the population of the already densely-populated Project area by 26.4% and 11.7% of the entire growth in the city, the Households by 29.4% and 14.5% of the entire growth in the city. (p.4-67, Table 4-2). The DEIR claims the Project would create 4,440 new housing units by 2025 in the Project area, and yet amazingly claims that the Project would "not cause an adverse physical impact" or "concentration." (p. 4-68). U-23

The DEIR claims with no support that the Project would "indirectly" increase "affordability" of housing. (p. 4-69) In fact, only the giveaway of the "Central Freeway" parcels to the San Francisco Redevelopment Agency (a private development entity) would mandate any "affordable" housing, and that only to entitled persons, not to the general public or existing residents in the Project area. U-24

9. The DEIR does not accurately describe the Project or existing conditions (baseline) in the Project area.

The DEIR misstates existing conditions within the Project area, and obfuscates is real purpose with fuzzy, feel-good verbiage. The Project's obvious purpose is to exempt developers from existing density, height, bulk, setback, open space, and parking requirements, among others, and to create a wholesale giveaway of the center-city area to ugly, modern density and high-rise development. U-25

At the same time, both the Project and the DEIR engage in an improper ideological bent to punish the majority of existing residents and visitors to the Project area and San Francisco, who own, drive, and need a place to park automobiles. This purpose disserves the majority of residents and visitors, and the DEIR's endorsement of it lacks objectivity and is improper. Leaving out analysis of severe and significant adverse impacts for unwritten ideology advocating punishing car-owners does not comply with CEQA. U-26

Analysis of aesthetic and human impacts from overdevelopment and incompatible, bulky, ugly modern structures as proposed by the Project are completely missing from the DEIR. The DEIR misstates that new developments would have lower heights, but the proposed re-zoning states the contrary in virtually every area. U-27

The DEIR amazingly claims that "increases in building height" to 400 feet would not result in "adverse change in regard to visual quality." (p.4-98) The Project also proposes increases in height, bulk and density in virtually every area, e.g., along the new Octavia, where the Project proposes an increase in height to 5 stories of every building on the "Central Freeway" parcels-- on a street characterized by two- and three-storey residential structures. The illustrations at, e.g., pp. 4-101 through 4-103 and 4-109 are the only "projections" in the DEIR, and those describe incredible increases in height and U-28

bulk and incursions right to the respective sidewalks of ugly developments. There is not one single projection of the numerous, vaguely-described "towers" of up to 400 feet, which the Project and DEIR would invite, but which neither describes. U-28

Other Project increases are ill-described, except as generalized exemptions for developers from existing Code and General Plan requirements. U-29

10. The DEIR fails to properly analyze noise impacts and propose mitigation.

11. The DEIR does not accurately or adequately describe the significant adverse impacts from the Project's proposed demolition of the Safeway and other neighborhood-serving retail establishments in the Safeway center in order to create yet another ugly, modern, sterile residential development with inadequate parking. U-30

The DEIR claims the Project advocates "neighborhood-serving retail," but proposes to demolish the only supermarket in the entire Project area, the Safeway at Market and Church. In its place the Project and DEIR cheerlead for yet more residential development and less parking. The DEIR makes no attempt to analyze the significant adverse impacts from this alteration.

12. **The DEIR does not accurately assess cumulative impacts from each component within the Project and the Project as a whole on the immediate Project area and the larger cumulative area.** U-31

It is well-established that CEQA requires an analysis of cumulative impacts. There is no objective analysis of cumulative impacts from the Project and its components in the DEIR.

13. The DEIR improperly piecemeals the Project by claiming that impacts have not yet been assessed but implying they will be assessed at some unstated time in the future. U-32

It is settled law that a whole Project and every part of it must be analyzed and not piecemealed by putting off parts of it to some other, indefinite time.

14. The DEIR proposes no reality-based mitigations for the many significant adverse impacts of the Project.

At pp. 5-1 – 5-21, the DEIR pronounces it does not have to propose mitigation measures for major, significant, adverse impacts described above, declaring as a mantra that "no significant impacts have identified at the program or project level." The circular rationale seems to be that if the DEIR blanketly refuses to analyze impacts, that means there are none, and thus no mitigations need be discussed. This "rationale" is illegal under CEQA. U-33

B. WE SUPPORT THE "NO PROJECT" ALTERNATIVE.

The commenters herein endorse and support NO PROJECT, because the proposed Project will have severe, lasting, significant adverse impacts on the environment of the Project area and the entire City and will result in permanent degradation of the physical environment and quality of life for residents and visitors to the entire area.

The Project proposes permanent, degrading physical changes to the entire Project area, as well as radical changes to the General Plan, Planning Code, Zoning Maps and other governing laws. It offers nothing to any persons now residing in the Project area except adverse impacts on their environment and quality of life. Instead, it is a windfall for developers, creating permanent degrading exemptions from existing density, height, bulk, setback, open space, and parking requirements. Thus it disserves the public at large in favor of creating financial incentives for development in an already densely-populated area.

U-34

Instead of objectively identifying and analyzing the numerous adverse impacts from this Project, the DEIR—assembled by the same corrupt City department that is the Project proponent—abuses the CEQA process by advocating for a pro-development policy in the City. That purpose is patently improper and makes the DEIR a largely useless document.

U-35

CONCLUSION

For the above-described and other reasons, the DEIR is flawed beyond legal acceptability under CEQA, and the commenters herein endorse the "NO PROJECT" ALTERNATIVE.

DATED: August 9, 2005

Mary Miles

Letter U – Mary Miles, Coalition for Adequate Review

U-1

Comments regarding the applicant's statements that the Plan will have significant impacts are noted. As presented in the DEIR summary in Table 1-1 starting on page 1-9, the implementation of the Plan would result in potentially significant and unavoidable shadow, traffic, and transit impacts. These impacts are discussed in greater detail in sections 4.5 and 4.7 of the Chapter 4 Environmental Setting and Impacts of the DEIR.

The Project Area for the *Market and Octavia Neighborhood Plan* is the area that has been affected by removal of the Central Freeway and by the Octavia Boulevard replacement project and the reconstruction of the Central Freeway, south of Market Street, as well as adjacent areas along the Market Street corridor that are within a quarter mile walking distance of a major transit hub and are considered likely candidates for transit-oriented development. While the Plan would allow for increased density in some parts of the Project Area, particularly around the Market and Van Ness Avenue intersection, in many sections of the Project Area the heights would either remain the same or would be reduced. Chapter 3 of the DEIR describes the proposed project and the impacts are addressed in Chapter 4 of the DEIR as required by CEQA.

U-2

As noted in the DEIR, page 3-29 and 3-30, the Octavia Boulevard Project and the new Central Freeway touchdown at Market Street were the subject of independent environmental review completed in 2000. Construction of these projects was completed in 2005. The transportation analysis conducted for the DEIR assumes that these projects were completed and adjustments were made to earlier traffic counts collected to reflect the anticipated changes to traffic patterns associated with these new transportation facilities.

Subsequent to the DEIR, additional count data was collected in November 2005 to determine actual shifts in traffic patterns related to the Octavia Boulevard freeway touchdown. These existing counts were applied to background growth rates developed from the model (as documented in the DEIR) and compared to future 2025 volumes without the Plan. The attached appendices present detailed figures and count survey information. As a result, these latest counts were consistent with

assumptions based on output from the San Francisco County Transportation Authority's (SFCTA) travel demand model for future 2025 Conditions. The results of this analysis was also compared to spot counts conducted in October 2005 by Korve Engineering as well as spot counts conducted in December 2005 by DPT. It was determined that the volume estimates are consistent with actual traffic volumes after the ramps and the boulevard were opened.

The new count information found approximately 3,200 vehicles use the Octavia Boulevard during the weekday PM peak hour. Of those, around 95 percent are traveling to and from the freeway ramp.

U-3

As stated on page 4-230 of the DEIR, parking impacts are analyzed at the program level to determine the potential parking shortfalls under the proposed zoning districts. Parking policies such as revising provisions of the Residential Parking Permit program and adopting a parking fee structure in city-owned garages were analyzed as long-term transportation projects at a program level. These long-term projects would be subject to additional environmental review when more specific plans are developed.

The removal of existing parking facilities due to the redevelopment of the Central Freeway Parcels is discussed in Response to Comment C-4. In general, parking shortfalls relative to demand are not considered significant environmental impacts in the urban context of San Francisco. Parking deficits may be an inconvenience to drivers, but are not considered significant physical impacts on the environment. The elimination of the parking spaces from the freeway parcels for the construction of the Octavia Boulevard were evaluated as part of the Central Freeway and Octavia Boulevard environmental review concluded in 2000 and while discussed in the DEIR are not part of the proposed Plan.

U-4

See Response to Comment S-3 regarding the assessment of parking impacts.

U-5

As discussed in Response to Comment U-3, the Plan is not responsible for the elimination of off-street parking resulting from the demolition of the elevated Central Freeway. The effects of this demolition were addressed as part of existing and future conditions, but an independent environmental review for the Central Freeway and Octavia Boulevard were completed in 2000.

Approximately 17 off-street public off-street parking facilities were incorporated in the discussion of existing parking conditions, including the Performing Arts garage and the Civic Center garage, two large facilities with over 600 parking spaces, located in or adjacent to the Project Area. See Response to Comments A-26 and C-1.

Subsequent to the DEIR, additional parking information was collected to compare existing conditions (as stated in the DEIR), conditions after the opening of the Octavia Boulevard touchdown, as well as future conditions after the redevelopment of the Central Freeway parcels. The Plan does not assume that parking demand would be completely eliminated or "magically disappear" based on the supply of parking. The Reduced Vehicle Ownership parking demand was prepared as a comparison to the standard citywide value, if the current vehicle ownership within the Project Area is maintained by new residents. The Plan also offers recommended strategies for managing parking demand and compares various scenarios of minimum and maximum supply allowances. Under a scenario assuming a reduced parking demand and a maximum supply (allowed through conditional use), there would be a Project Area surplus of around 730 spaces during weekday midday and 110 spaces during the weekday evening. In comparison, a scenario was also prepared assuming 1.0 parking space per 1.0 housing unit, which results in a shortfall of around 70 spaces during the midday and 1,200 spaces during the weekday evening. Decision-makers are presented with information on different parking demand and supply scenarios to assist them in making policy decisions.

U-6

Average vehicle ownership rates per household are based on Census 2000 journey-to-work information within the Project Area (census tracts 124, 162, 163, 168, 169, 176-01, 176-02, 177, 178, 201, 202, and 203) as well as for San Francisco as a whole. Using U.S. Census journey-to-work information is also the standard approved methodology of *SF Guidelines* to determine the

distribution of all residential trips based on the geographic destinations indicated in the relevant census tract data.

Census information is collected every ten years, most recently in April 2000. During each decennial census, the Census Bureau collects data from every household in the U.S. and its territories. Besides the decennial census, the Census Bureau conducts nearly one hundred other surveys and censuses every year. The information collected for each census and survey is summarized by geographic area and then published.

A separate demand scenario was developed based on the standard methodology used by the Planning Department. The reduced vehicle ownership parking demand is not intended as a "baseline" scenario as the commentor suggested. As stated in Response U-5, decision-makers are presented with information on different parking demand and supply scenarios to assist them in making policy decisions.

U-7

See Response to Comment U-5 regarding future parking demand and parking impacts associated with the removal of the Central Freeway.

U-8

As stated on pages 4-197 to 4-198 of the DEIR, although outside of the Project Area, the Civic Center garage was included in the analysis due to its size. See Response to Comment M-20 regarding the implementation of parking policies to make more efficient use of existing parking to serve Civic Center patrons, visitors and residents.

U-9

The documentation of the parking shortfall within the Project Area does not include the supply and demand of existing parking facilities; it focuses solely on the parking shortfall associated with the Plan's proposed land use changes. As such, inclusion of the Civic Center garage in the DEIR (which was only included in the existing parking conditions as supplemental information) does not affect the findings of the future parking analysis.

The DEIR is not required to mitigate the identified parking shortfall, as discussed in Response to Comment S-3, because no significant parking impacts have been identified.

U-10

See Response to Comment L-1 for a detailed discussion of the schedule for Plan development and review of the DEIR. The DEIR, which was released in June 2005, had a 45-day public review period consistent with the requirements of CEQA. The public review period was extended until August 23 in response to requests from some neighborhood representatives for additional response time.

In response to the many comments received regarding the traffic impacts, new traffic data was collected at select intersections in fall of 2005 to assess the impacts of the new traffic patterns associated with the opening of the new freeway ramp and Octavia Boulevard. The data is summarized in Response to Comment U-2.

U-11

The recently opened Octavia Boulevard and freeway touchdown are identified as elements of the Plan, however, they were reviewed and approved as independent projects prior to the publication of the Plan. Therefore, the Plan is not required to expressly address the potential transportation-related impacts of the new facilities.

Traffic conditions related to the Octavia Boulevard freeway touchdown are included as part of future 2025 impact analyses (see pages 4-212 to 4-214 of the DEIR). Subsequent to the DEIR, supplemental field counts were conducted in December 2005 during the weekday PM peak hour (post-opening). It was determined that these current traffic counts are consistent with the projected traffic volumes for the freeway on- and off-ramps and the Octavia Boulevard. Therefore, it is concluded that the traffic analysis contained in the DEIR accurately reflects conditions with the ramps and Octavia Boulevard. This analysis confirms that the rerouting of traffic to and from the freeway is addressed adequately in the DEIR.

U-12

Future 2025 traffic conditions related to the Central Freeway and the adjustments to existing

volumes to account for the demolition of the Fell Street off-ramp and rerouting of traffic to city streets are included in the DEIR (see page 4-207). These traffic volumes illustrate the changes to the vehicular travel patterns with the new freeway ramps, including the shifting to traffic volumes to Octavia Boulevard.

As stated in Response to Comment U-11, the recently opened Octavia Boulevard is identified as an element of the Plan, but was the subject of independent environmental review prior to the publication of the Plan. Note that 2025 future traffic conditions have been analyzed with and without the Plan's Travel Projections (see pages 4-212 to 4-214 of the DEIR).

U-13

See Response to Comment U-12 regarding the analysis of the impacts of the Octavia Boulevard and the freeway ramp projects in this DEIR.

U-14

Pages 4-212 and 4-223 of the DEIR describe the traffic impact analysis with and without the Plan as well the contribution of the Plan to the 2025 with Plan intersection turning movement volumes. Additional details of the traffic analysis can be found in the *Market & Octavia Plan EIR Transportation Study – Final Report*, dated May 31, 2005 (available for public review by appointment at the Planning Department, 1660 Mission Street, Fifth Floor).

U-15

Pages 4-214 through 4-223 of the DEIR describe the impact analyses related to any street configuration changes proposed by the Plan. Impacts associated with the project level transportation improvements identified on pages 4-179 through 4-181 are also assessed under 2025 Central Freeway Parcels/Near –Term conditions as well as 2025 with Plan conditions.

U-16

The DEIR proposes mitigation measures that would reduce the effect of the project traffic to less-than-significant levels. However, as documented in the DEIR, there would be some locations where adequate mitigation measures cannot be developed; at these locations, the Plan would result in significant unavoidable traffic impacts.

U-17

Pages 4-192 through 4-197 of the DEIR present the existing transit service analysis for both the Muni corridor as well as regional transit service. Page 4-223 through 4-230 of the DEIR describes the impact analyses related to the Plan's transit demand. In general, transit service within the Project Area is not currently overcrowded; with the Plan, there would still be adequate service to accommodate the future demand for transit service.

U-18

Contrary to assertions by the commentor, the purpose of the DEIR is to assess the environmental impacts that would occur with the implementation of the *Market and Octavia Neighborhood Plan.* The main objectives of the Plan and the specific elements of the Plan are described in detail in the Project Description, Chapter 3 of the DEIR. A detailed assessment of environmental impacts related to land use and zoning (pages 4-42 to 4-62 of the DEIR); population, housing, and employment (pages 4-64 to 4-74 of the DEIR); urban design and visual quality (pages 4-96 to 4-111 of the DEIR); shadow and wind (pages 4-119 to 4-130 and pages 4-133 to 4-136 of the DEIR); historical resources (pages 4-152 to 4-177 of the DEIR); transportation (pages 4-203 to 4-244 of the DEIR); air quality (pages 4-252 to 4-260 of the DEIR); noise (pages 4-4-268 to 4-277 of the DEIR); hazardous materials (pages 4-289 to 4-298 of the DEIR); geology, soils, and seismicity (pages 4-307 to 4-316 of the DEIR); and public facilities, services, and utilities (pages 4-325 to 4-328 of the DEIR) is contained in Environmental Setting and Impacts, Chapter 4 of the DEIR. Chapter 5 recommends mitigation measures for all significant impacts as required by CEQA. Potentially significant and unavoidable adverse shadow, traffic, and transit impacts are identified in the DEIR as no feasible mitigation measures were identified to mitigate certain impacts to a less than significant level.

U-19

The potential concentration of new high rises in certain sections of the Project Area is not dismissed in the DIER as suggested by the commentor. The potential for compounding "existing wind conditions in the area" as referenced on page 1-8 is in fact alerting the public that the potential for additional wind impacts in an area already experiencing high wind conditions due to building construction and configuration may be a controversial issue.

The detailed wind discussion is presented on pages 4-130 through 4-136 of the DEIR. As noted in the analysis on page 4-135, the wind impacts resulting from individual development allowed in the Project Area where height increases are proposed, would be potentially significant. Implementation of standards, similar to those imposed for the C-3 District or the Van Ness Avenue Special Use District as outlined in Mitigation Measures 5.5.B1 and 5.5 B2, page 5-3 of the DEIR, would reduce the impact to a less than significant level.

The visual impacts and the impacts to archaeological and architectural resources in the Project Area are discussed on pages 4-96 through 4-111, pages 4-152 through 4-158, and pages 4-168 through 4-174 of the DEIR, respectively. See Response to Comment U-20 for a more detailed discussion of the visual impacts.

U-20

Commentor's opinions about the merits of high-rise development are noted.

The historical context of the Project Area is presented on pages 4-137 through 4-142 of Chapter 4 of the DEIR. See Response to Comments A-18 through A-24 for additional clarification. The visual impacts and the impacts to archaeological and architectural resources in the Project Area are discussed on pages 4-96 through 4-111, pages 4-152 through 4-158, and pages 4-168 through 4-174 of the DEIR, respectively.

The greatest height increases proposed in the Plan are primarily confined to three sections of the Project Area: along the west side of Franklin Street between Turk and McAllister Streets; the blocks between Franklin Street and Van Ness Avenue from Fell to Mission Streets and continuing along South Van Ness Avenue between Market and Howard Streets; and upper Market Street between Fillmore and Noe Streets. The heights in the remaining sections of the Project Area would either remain as they are today, be reduced, or be increased by only five feet.

Also see Responses to Comments H-1 and H-2 regarding the protection of historic resources in the Project Area and the impacts of the proposed height increases on these resources.

U-21

See Responses to Comments U-18 and U-20 regarding the assessment of impacts associated with the implementation of the Plan. A comprehensive Project Description and impact analysis, including a visual analysis, are included in the DEIR consistent with the requirements of CEQA. The policies of the Plan are consistent with the citywide, "Residential Design Guidelines" as described on pages 4-23 and 2-24 of the DEIR. The Residential guidelines were used as the foundation for the guidelines developed for the *Market and Octavia Neighborhood Plan.* To the extent that the policies of the Plan provide more specific development guidance in the Project Area, the Plan guidelines shall apply.

Section 4.4 of the DEIR discusses at length the visual and urban design context and the effects that would result if the Plan were to be implemented. The DEIR discusses the proposed scale, character, and architectural features of the Plan as well as the existing conditions and then considers the potential impacts of the Plan. For example, see the DEIR discussions of visual impact and the accompanying visual simulations, Figures 4-14 and 4-15, showing the effects of the taller buildings along Market Street and the high-rise development closer to the Civic Center Area, as well as Figure 4-16, which shows the projected heights along Octavia Boulevard. This overall method of analysis and public disclosure is the essence of achieving compliance with the requirements of CEQA. Since the commenter presents no specific reference to specific faults in the DEIR to which this comment applies, no further response can be made.

Urban and residential design guidelines are discussed in DEIR, Section 4-3. The current set of "Residential Design Guidelines" was adopted by the City Planning Commission in December 2003. The "Residential Design Guidelines" promote design that will protect neighborhood character and enhance the attractiveness and quality of life in the city. These replaced the first "Residential Design Guidelines" adopted in November 1989. The Guidelines address basic principles of urban design to govern residential development so that it maintains cohesive neighborhood identity, preserves historic resources, and enhances the unique setting and character of the city and its residential neighborhoods. The compatibility of these guidelines with the Plan is considered in Section 4-3 of the DEIR.

U-22

The Plan proposes the creation of a dense transit-oriented neighborhood that builds on the existing character of the Project Area. Well-designed infill housing is proposed as a means of increasing the housing opportunities in the neighborhood. As part of the concept to improve the neighborhood, the Plan advocates improvements to the Project Area's public streets and open spaces including traffic calming, street tree planting, new park creation, and streetscape improvements. While the public street enhancements would add to a positive pedestrian environment in the neighborhood, the major open spaces would be created at Octavia Plaza on Market Street adjacent to the Central Freeway touchdown; McCoppin Square off the Street right-of-way west of Valencia Street; and Brady Park at the northeast corner of the Brady and Colton Streets intersection. The greatest opportunities for infill housing would occur on parcels vacated by removal of the Central Freeway and along major streets such as Franklin Street, South Van Ness Avenue, and Upper Market Street as noted in Response to Comment U-20. Other infill housing could occur on parcels throughout the Project Area, however, the height limits on these other parcels would be decreased, remain the same, or be increased by only five feet. The impacts on the Project Area and the entire city are discussed in Section 4.4.

U-23

The last sentence in the first paragraph on page 4-68 of the DEIR concludes that the increase in population that would result from implementation of the *Market and Octavia Neighborhood Plan* would not be a significant adverse physical impact. An increase in residential population is not considered an adverse physical environmental impact unless the increase results in other physical impacts which would cause a significant adverse effect on the environment. As stated in the fourth and fifth sentences in the first paragraph on page 4-68 of the DEIR, potential environmental effects associated with population growth would be increased traffic congestion, and associated air quality and noise, and increased demand for public services that would result in the construction of new facilities. These impacts are discussed in Sections 4.7, 4.8, 4.9, and 4.12 of the DEIR.

U-24

See Response to Comment M-17 regarding the affordability of housing as it relates to the provision of on-site parking.

The second paragraph under the Housing Affordability discussion on page 4-69 of the DEIR states that the *Draft Market and Octavia Neighborhood Plan* contains polices that would indirectly make housing more affordable by reducing housing and household costs associated with driving. The indirect "increase" in housing affordability referred to by the commentor is tied directly to housing costs associated with driving and the cost of parking. As stated on page 4-69 of the DEIR in the second sentence of the second paragraph of the Housing Affordability discussion, these policies include eliminating off-street minimum residential parking requirements; establishing residential parking caps; and separating the cost of parking from the cost of housing.

This statement is substantiated by data contained in the *Draft Market and Octavia Plan.* Page 114 of the Plan states:

> "A parking space adds $20,000 to $30,000 to the cost of building a unit of housing – upwards of $50,000 in some parts of the city. These costs are very real; they are passed directly on to residents. Forcing people to rent or buy parking raises the costs of housing – which means fewer units get built. That's money that people could use for other things, especially lower income San Franciscans who struggle with the rising costs of living here."

This analysis is further supported by a Legislative Analyst Report to the Board, which researched barriers to residential development in San Francisco. That report estimates the cost of constructing parking in a dense urban area such as San Francisco at between $17,000 and $50,000 (Supervisors Office of Legislative Analyst, San Francisco Housing Development, June 11, 2003).

The text in Chapter 4, page 4-69 of the DEIR, third paragraph, is revised to read as follows:

> ~~"The Plan also contains policies that would indirectly make housing more affordable by reducing housing and household costs associated with driving. These measures include, eliminating off-street minimum residential parking requirements; establishing residential parking caps; and separating the cost of parking from the cost of housing. The Plan policies aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing.~~ The Plan policies

aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing. The Plan also contains policies that would indirectly make housing more affordable by reducing housing and household costs associated with driving. These measures include eliminating off-street minimum residential parking requirements; established residential parking caps; and separating the cost of parking from the cost of housing. Elimination of minimum off-street parking requirement would reduce the unit cost of housing by allowing a developer to build more housing on site. According to the San Francisco Legislative Analyst, approximately 20 percent more San Francisco households would qualify for mortgages for units without parking than for units with parking (Office of Legislative Analyst, San Francisco Housing Development, June 11, 2003). Establishing residential parking caps would have the same effect, by not creating an incentive to "over-park" new residential development and, thus, increase housing costs per unit. Separating the cost of parking from the cost of housing also makes housing more affordable because it enables potential buyers to choose if they want to include parking in their housing costs instead of parking being a built- in price factor. With materials, construction and land costs somewhat fixed during development, parking is one of the few direct costs to a developer that could be reduced by these policy changes. The Plan policies aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing."

The San Francisco Redevelopment Agency is a public agency, created under the provisions of the State of California Community Redevelopment Law. Affordable housing, as developed by the Redevelopment Agency, is broadly marketed to the public and generally available to households who qualify at certain income levels, usually through a neutral selection process, such as a lottery. The creation of new affordable housing on the Central Freeway parcels, and within the Project Area is discussed under Response to Comment AA-6.

U-25

The commentor has provided no specific references as to where the existing conditions are misstated. Contrary to the assertions of the commentor, the existing conditions, with text corrections as noted in this document, are accurately presented in the EIR. The purpose of the

DEIR is to present the elements of the proposed Plan in the Project Description and to analyze the environmental impacts associated with the implementation of the Plan. The objectives of the Plan as stated on pages 3-1 and 3-2 of the DEIR are to create a dense and vibrant transit-oriented neighborhood that reflects the unique character of the neighborhood and provides opportunities for infill housing. High-rise development would be limited to sections of Franklin Street and the area surrounding the Market Street and South Van Ness Avenue intersection.

U-26

As noted by the commentor, the Plan advocates a certain ideological approach of dense, transit-oriented infill development for the Project Area. The Plan's emphasis on parking control and promotion of alternative travel modes to the private automobile are broadly consistent with existing *General Plan* policies, though the policies in the Plan that promote transit-oriented development are more aggressive than existing policies. Determining whether the philosophical approach of the Plan is valid or not, is not the responsibility of the environmental analysis. To the extent that the DEIR must describe the Plan and its elements for informational purposes, the ideological approach is represented in the DEIR. The DEIR is an objective document, however, intended to provide decision-makers with an understanding of the environmental impacts associated with the implementation of the Plan and does not advocate a specific position on the validity or merits of the Plan. The Planning Commission and the Board of Supervisors will make a decision to support or oppose the proposed Plan after the Final EIR is certified.

The potentially significant traffic and transit impacts associated with implementation of the Plan are summarized in Table 1-1 on pages 1-28 through 1-34 and the transportation impacts are discussed in detail on pages 4-203 through 4-244. Potentially significant impacts have not been left out of the discussion.

U-27

The urban design and visual analysis for the Plan is included on pages 4-96 through 4-111 of the DEIR.

The commentor misstates the proposed height changes in the Plan. Figure 4-3 as revised in Section 5, page 5-25 of this document, shows the existing height limits in the Project Area and Figure 4-4 as

revised (see Response to Comment O-1) shows the proposed height limits in the Project Area. As can be seen on the figures, and noted in Response to Comment U-14, the concentrations of heights above 100 feet occur in the vicinity of the Van Ness Avenue/South Van Ness Avenue/Market Street intersection and on Franklin Street around Golden Gate Avenue and Turk Street. The heights in the majority of the neighborhood areas would remain at 55 feet and below.

U-28

The commentor is taking language from page 4-98 of the DEIR out of context. Paragraph three notes that heights would increase approaching the Market Street/Van Ness Avenue intersection with the implementation of the Plan. At the heart of this intersection building heights would be increased from the current maximum of 320 feet to 400 feet. The fifth paragraph on page 4-98 states that in the heart of the South of Market District, where heights would range from 250 to 85 feet, "the increases in building height would not, in themselves, result in an adverse change in regard to visual quality" as building heights in this area already range from 200 to 400 feet.

The commentor's statement about the height changes on Octavia Boulevard proposed by the Plan is incorrect. Parcels directly bordering Octavia Boulevard, north of Fell Street, would have height limit increases of five feet. The heights on the parcels bordering Octavia Boulevard, south of Fell Street, would be reduced from the existing 80-foot height limit to a 50- or 55-foot height limit.

Figure 4-14 on page 4-101 of the DEIR is intended to show the potential height increases at the corner of Market Street and Van Ness Avenue, the location where the highest height limits of 400 feet would be allowed under the Plan. The view is from Market Street, looking east to Van Ness Avenue. As can be seen in the figure, there are already numerous high-rise buildings in the vicinity of this intersection. See also Response to Comment AA-22 regarding revisions to Figure 4-14.

The DEIR describes the buildings only within the parameters of the envelope that is defined by the lot shape and building height. The resulting envelope is only a gross approximation of what any building would look like, but to do more to define the buildings now would be speculative. Figure 4-14, page 4-101, presents bulk building outlines based on the defined building envelopes within the photograph's field of view. This figure includes the part of the Project Area with the greatest concentration of new high-rise structures. Given that these envelopes define the largest structures

that would fit on the individual lots, the actual buildings that could be built would be somewhat smaller, given that visual design features and various design modifications, such as upper level setbacks, volume reductions and tower orientation, could be needed to mitigate adverse shadow and wind effects of the building.

The Plan is not recommending exemptions from the existing code and *General Plan* requirements for developers. The Plan recommends a policy change in how parking is provided in neighborhoods well served by transit that would be translated to changes in the *Planning Code* and the *General Plan* should the Plan be adopted by the Planning Commission and the Board of Supervisors after certification of the Final EIR. The DEIR, which is a program level environmental document, analyzes the general impacts associated with the implementation of the Plan. The City would subject future projects, with the exception of those analyzed at a project level in this EIR, to independent environmental review in the future as specific development proposals are put forward.

The general nature of the Plan does not permit the detailed analysis and precise determination of all the visual effects that could occur, because these effects depend substantively on the details of the designs of buildings proposed and the details of the buildings that surround them.

U-29

See Response to Comment S-3 regarding the assessment of direct and secondary parking impacts in the DEIR.

The existing noise conditions and the noise impacts resulting from the implementation of the Plan are discussed in Chapter 4.9, Noise on pages 4-261 through 4-277 of the DEIR.

U-30

See Responses to Comments S-1 and S-2 for a discussion of the redevelopment strategy included in the Plan for the Safeway site.

A design concept for the site at the corner of the Market and Church Street intersection, where the existing Safeway store is located, is presented in the Plan. The Plan policies call for a mixed-use development on the site. The design concept includes a supermarket adjacent to Market Street, 3-4

story residential buildings (185 residences) above parking or retail, small ground floor retail establishments, and 250 to 300 parking spaces. This design concept is intended only as a guide for future development, however, and is not a specific development proposal analyzed in this EIR. If in the future a specific development proposal were to be presented by the property owner(s), a project level environmental review would be required.

The policies and design concept for the site at the Market and Church Street intersection are, however, evaluated at a program level in this DEIR. The population and employment projections for the Project Area assume that redevelopment would occur in the future on this site as part of the overall Project Area, which would increase the overall number of residential units. These population and employment projections were also used as the basis for the transportation, air quality, and noise analysis in the DEIR. The hazardous materials; geologic, soils, and seismic; and public facilities, services, and utilities impacts were addressed at a program level with respect to implementation of the Plan. Other environmental impacts of the redevelopment of this site were specifically addressed on the following pages of the DEIR: Urban Design and Visual Quality, pages 4-98, 4-100, and 4-102; Shadows, page 4-121; Wind, page 4-134; and Historical Resources, pages 4-154.

U-31

The commentor does not state what aspects, if any, of the cumulative analysis that were included in the DEIR are incorrect. The City agrees that CEQA requires an analysis of cumulative impacts. Each section of Chapter 4, Environmental Setting and Impacts of the DEIR contains a discussion of cumulative impacts. The cumulative impacts discussions begin on the following pages of the DEIR, Land Use and Zoning, page 4-61; Population, Housing, and Employment, page 4-73; Urban Design an Visual Quality, page 4-111; Shadows, page 4-130; Wind, page 4-136; Historical Resources, pages 4-158 and 4-172; Transportation, page 4-220; Air Quality, page 4-259; Noise, page 4-277; Hazardous Materials, page 4-297; and Public Facilities, Services, and Utilities, page 4-327.

U-32

CEQA prohibits segmenting or piecemealing of a project into smaller components for the purposes of avoiding full disclosure of the environmental impacts of a project (or plan). The rule against segmenting does not, however, require that every component of a project be included in a single environmental document. CEQA only requires that all reasonably foreseeable project components

be included; those that are remote or speculative are not required to be included. The many specific transportation improvements recommended in the Plan that do not have an identified funding source and are expected to be implemented in the long-term only if funding becomes available are not included as part of this program level environmental review.[36]

U-33

The commentor contends that the DEIR does not adequately address mitigation measures because she does not concur with many of the environmental findings that there were no significant impacts. The DEIR objectively analyzes the environmental impacts in Chapter 4, the results of which are summarized on Table 1-1 beginning on page 1-9, and concludes that potentially significant and unavoidable shadow, traffic, and transit impacts would occur as a result of implementation of the Plan. Potentially significant wind, archaeological, traffic, air quality, hazardous waste, and soils impacts are also identified, but are noted to be reduced to a less than significant level through the implementation of mitigation measures which are also summarized in Table 1-1.

U-34

Comment expressing support for the No Project Alternative is noted.

U-35

See Responses to Comments U-26 and U-33 for a discussion of the impact analysis and the identification of significant impacts identified in the DEIR.

[36] This position was upheld in the *Laurel Heights Improvement Association v. Regents of the University of California* (1998) case.

COALITION FOR SAN FRANCISCO NEIGHBORHOODS
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August 9, 2005

City & County of S.F.
Dept. of City Planing

AUG 10 2005

OFFICE OF
ENVIRONMENTAL REVIEW

Mr.Paul Maltzer
Environmental Review Officer
Planning Department
1660 Mission Street, Ste.500
San Francisco, CA 94103

Re: Case #2003.0347E, Market Octavia EIR

Dear Mr.Maltzer:

With the Octavia Market EIR, the City is promoting historic change in land use policy without directly saying so.

It is promoting densification of housing along transit corridors without 1:1 parking. V-1

The EIR and the policy it contains is not consistent with the eight priority policies of PROP M and invite a voter backlash or lawsuits.

This is because you have failed to fully inform and get approval from the people of San Francisco who are your employers. V-2

The Better Neighborhoods EIR calls for the construction of 6,000 units of housing in the Octavia & Market area while it declares that no parking is necessary. V-3

The EIR also distinctively establishes minimum as well as maximum height limits of 400 feet at Van Ness & Market, and it requires conditional use authorizations for parking which is just the reverse of present policy. V-4

The City is proposing increased density that is only made possible by the waiver of parking for new residential construction. V-5

Thus many of the elements of the Market & Octavia Plan are precedent setting.

Yet approval is being sought in August, the month when many are away on vacation.

The City is heading for a collision with its Citzens--a collision as big as Props K, L & M. V-6

You are ahead of public awareness and understanding of these tradeoffs and that you run the risk of promoting a counterattack at the ballot and courts.

The following key issues need to be addressed by the Planning Commission prior to the adoption of this EIR in order to meet your legal requirements.

1. It is unwise to pack the City with new residents densely congregated in highrise construction given our acute seismic risk. V-7

2. We need a specific Seismic Public Safety Element to the General Plan. What about EIRs for buildings over say, 100 feet that addresses and details emergency evacuation. V-7

3. The public hearing last March indicate that most buyers want/need parking V-8

4. Studies on projects built without parking indicate that the residents simply rent parking in adjoining lots and garages. V-9

5. The assessment of fees for the substantial public benefit conferred on developers for parking waived are required to build transit improvements. V-10

6. 50% of the cost-savings provided to project sponsors for waived parking be captured to build such things as the Bus Rapid Transit system which is presently unfunded. V-11

7. There be a requirement that adequate public facilities such as Bus Rapid Transit, water/sewer, police/fire precede or be concurrent with densification? V-12

8. Thousands of new residents without parking will demand the City construct garages as street parking becomes increasingly difficult. V-13

9. New units without parking will shift the burden of providing parking from developers to the taxpayer. V-14

Conclusion V-15

In the past when you have been too far ahead of the public--the Fontana, the Federal Building, downtown development, work space lofts--the result is a ballot initiative.

We do not think the public is aware of or accepts the concept of the waiver of parking for housing on transit corridors.

This question must be put to the people directly and forthrightly in order to maintain their trust. V-16

Finally, companion legislation supporting mitigations for densification must be incorporated as part of your EIR in order to demonstrate that your proposal is balanced.

Sincerely,

Judy Berkowitz

Judy Berkowitz, President

Letter V – Judy Berkowitz, Coalition for San Francisco Neighborhoods

V-1

See Response to Comment D-1 regarding the purpose of the proposed Plan and its presentation in the DEIR.

V-2

See Response to Comment D-2 regarding the process for adoption of the Plan, including consistency with the priority policies of Prop M.

V-3

See Response to Comment D-3 regarding the amount of new housing projected in the Project Area.

V-4

See Response to Comment D-4 regarding the recommendations in the Plan related to parking and height minimums.

V-5

See Response to Comment D-5 regarding the Plan's emphasis on transit-oriented development.

V-6

See Response to Comment D-6 regarding the approval schedule for the Plan.

V-7

See Response to Comment D-7 regarding the assessment of seismic safety impacts in the DEIR.

V-8

See Response to Comment D-8 regarding seismic safety provisions in the Community Safety Element of the *General Plan* and requirements for environmental review for seismic safety considerations.

V-9

See Response to Comment D-9 regarding public opinion on provision of parking in new housing developments.

V-10

See Response to Comment D-10 regarding studies conducted on housing built with and without accessory parking.

V-11

See Response to Comment D-11 regarding the assessment of an in-lieu development fee for projects built without on-site parking.

V-12

See Response to Comment D-12 regarding the provisions of the City's Transit Impact Development Fee and applications in the Project Area.

V-13

See Response to Comment D-13 regarding the City's commitment to Transit-First and the status of the Van Ness Avenue Bus Rapid Transit Project.

V-14

See Response to Comment D-14 regarding parking demand characteristics in the Project Area.

V-15

See Response to Comment D-15 regarding the provision of public versus private parking in the Project Area.

V-16

See Response to Comment D-16 regarding the opportunities for public comment on the *Market and Octavia Neighborhood Plan.*

Robin F. Levitt, Architect
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9 August 2005

Paul Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: MARKET/OCTAVIA EIR – COMMENTS ON EVALUATION OF TRANSPORTATION PROPOSALS

Dear Mr. Maltzer,

I am a resident of the Market/Octavia Plan area and have been involved with the evolution of the proposed plan since the beginning of the process. I support most of the plan recommendations particularly the density, zoning, parking and transportation elements of the plan.

I have read parts of the draft EIR and would like to make the point that the one way system on Hayes and the accompanying double right and left turns at Hayes and Franklin, Hayes and Gough and Gough and Fell were put in place as TEMPORARY measures to handle traffic in the interim between the closure of the Central Freeway and the opening of the new ramp and Octavia Boulevard. The ramp and Boulevard are scheduled to open on September 9th.

W-1

It was always the intent to restore Hayes and the aforementioned intersections to the way they were before the closure of the Central Freeway. The retention of those measures after September 9th is inappropriate and possibly illegal. I suggest the EIR be revised to reflect this.

Thank you very much for your consideration.

Sincerely,

Robin F. Levitt

Letter W – Robin Levitt, Architect

W-1

The one-way configuration along Hayes Street existed prior to the 1996 Central Freeway closure and therefore was not a measure to manage traffic in the interim between the Central Freeway and the opening of the Octavia Boulevard. On-street parking changes near the intersections of Hayes Street/Franklin Street, Hayes Street/Gough Street and Fell Street/Gough Street have occurred as a result of the 1996 Central Freeway closure, however, these changes were not conditional as part of the Octavia Boulevard freeway ramps. The ultimate configuration of the streets is a policy matter for the Board of Supervisors and is not a question that is decided by this EIR. Comments should also be directed to the appropriate policymakers during the consideration of the Plan adoption.

See Response to Comments D-2 and D-6 regarding the approval process and schedule for the Plan.

Paul Maltzer
Environmental Review Officer
S.F. Planning Dept.
1660 Mission St., Suite 500
S.F. CA 94103

S.F.

EN

Public Comment on the Draft Environmental Report for the Market and Octavia Neighborhood Plan, Case No. 2003.0347E

1. The DEIR presents *no justification for this project*, which essentially involves encouraging housing development in the project area. According to the Planning Dept., there are already 10,500 housing units and more than 23,000 people living in the project area (Draft of the Market/Octavia Plan, page 45). For reasons unexplained, the Planning Dept. now proposes 4,440 *new* housing units for the area (1-2, DEIR), which would mean more than 40% more people living in that area. Since the "project sponsor" is the Planning Department itself, the final EIR needs to justify encouraging such a dramatic population growth for one neighborhood of San Francisco. The DEIR itself notes that, even *without* this project, the area will add 1,520 new housing units (4-43) in the same time frame. Why isn't that enough housing growth for the area? X-1

As the DEIR notes, there are already 800-900 new housing units planned for the old Central Freeway parcels. The proposed Plan recklessly proposes, without justification, encouraging more housing development in the area. Nor does the DEIR count of 4,440 new housing units by 2025 include the additional 450 housing units proposed for the old UC Extension site, which is in the center of the Plan area. X-2

The DEIR talks about creating "a dense, vibrant and transit-oriented neighborhood" in the project area. Yet there already is just such a neighborhood in that area. The final EIR needs to make this counter-intuitive case: Specifically how will encouraging up to 10,000 more people to live in the project area *improve* that neighborhood/area? X-3

2. Even though the Planning Dept. proposes a huge growth in the project area's population, it wants to *discourage* developers from providing parking spaces for the new housing units. The theory behind this is that, since the project area is near the Market St. transit X-4

corridor, residents of the new housing units won't need cars/parking. They can simply take a streetcar or a bus, or, even less plausibly, ride a bike. But it defies common sense to think that anyone who can afford an apartment in the project area---especially the market-rate housing units, which the DEIR notes at 4-209, will be 90% of the new units---will not own a car. The final EIR needs more than a dubious interpretation of selected census data to justify the irrational parking policy proposed in the DEIR. X-4

3. Octavia Blvd.: "The new Octavia Boulevard (approved and under construction) would be the centerpiece of the neighborhood, accommodating both regional and local traffic" (1-6). Octavia Blvd. will carry six lanes of traffic through the heart of the project area. According to Caltrans and the US government, the Central Freeway used to carry 100,000 vehicles a day over the project area ("San Francisco Central Freeway Replacement Project: Environmental Assessment," 1997, page 3). How many of those vehicles will be using the new Octavia Blvd. when the new freeway ramp opens up on Market St.? It's irresponsible of the Planning Dept. to *encourage* development in an area that already faces serious traffic problems without this project. The final EIR must contain an honest appraisal of the area's traffic both *before and after* implementation of this plan and, in particular, *after* the new freeway ramp becomes operational on Market St. later this year. X-5

4. "San Francisco does not consider parking supply as part of the permanent physical environment" (4-204). The city invites litigation on this issue if this assumption is included in the final EIR. Indeed, in the very next paragraph the DEIR back-peddles, as it notes that the "social effect" of deliberately encouraging inadequate parking for new housing units "may lead to physical environmental impacts such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion." X-6

5. Travel Demand, Methodology/Approach (4-205): This section of the DEIR does not include any realistic assessment of the impact of the new freeway ramp on Market St. across from Octavia Blvd. Since the ramp will open up before the end of this year, the EIR should include a specific study of the impact the ramp is already having on the project area. X-7

6. The DEIR is basing its analysis of the project's impact on public transit on 2002-2003 SF Muni data, which was collected before the recent round of cuts in Muni service due to budget problems (4-196). It should be noted that all of the transit lines in the area are already standing room only during commute hours. X-8

7. Residential highrises: The Plan also rather casually proposes an undetermined number of "elegantly designed" residential highrises up to 40 stories high for the area, which would mean a radical change in demographics (many more wealthy people), physical character, and population density in general for the area. This is not prudent planning. Rather, it is reckless social engineering that will be impossible to undo once it is done. Again, as in the Plan in general, there is no justification even attempted for this radical change in the physical and demographic character of that part of town. X-9

8. A note on style: Everyone in the Planning Dept. should be prohibited from using the overused word "vibrant" in all public documents. Its use in this DEIR is particularly inappropriate, since that part of town is already "vibrant" enough, thank you, without any misguided "enhancing" or "improvements" from the Planning Dept. X-10

In short, the big question unanswered---in fact, no answer is even attempted---in the DEIR is, How will radically increasing the population density and altering the physical makeup of this area "enhance the neighborhood character of the Project Area"? (4-337) The final EIR should at least try to answer that question. X-11

Rob Anderson
1516 McAllister St.
SF CA 94115

Letter X – Rob Anderson

X-1

It is not the role of the EIR to justify policy that is recommended in the Plan; the role of the EIR is to analyze the potential impacts of the policy proposals. Decision makers will decide the wisdom and the justification of the policies.

One of the primary goals of the Plan is to increase housing opportunities in the Project Area through the addition of "well-designed infill housing," as stated on page 3-1 of the DEIR. These new housing opportunities occur not only on the parcels vacated by the Central Freeway, but also on other sites where housing could be introduced in a manner that is consistent with the character of the surrounding neighborhood. A further goal of the Plan is to create a dense, urban neighborhood that takes advantage of the well developed transit service. As the density increases along with a commensurate level of neighborhood-serving retail and a high level of transit service, the need to rely on private automobile travel is reduced and the opportunities for taking the bus or train, walking, and bicycling increase.

The Housing Element of the San Francisco General Plan calls for the provision of "new housing, especially permanently affordable housing, in appropriate locations which meet identified housing needs..." The policies call for higher density residential areas adjacent to the downtown in neighborhood commercial districts. See page 4-6 of the DEIR for a summary of the relevant Housing Element objectives and policies. The projected increase in housing advocated by the Plan is consistent with established city policy.

In addition, the introduction of new housing units in the city would improve the jobs housing balance. As noted on page 4-65 of the DEIR, currently about 31 percent of the work force in the Project Area are in-commuters living in other parts of San Francisco or the Bay Area.

X-2

See Response to Comment X-1 regarding the role of the EIR and Response to Comment N-1 regarding the specific proposal for the UC Extension site. The Plan does not call for any changes to the UC Extension site and therefore the housing proposed for this site is not included in the initial

population, housing, and employment projections, *LUA 2002*, by the Planning Department. Subsequent to preparation of the Plan, the University of California Regents proposed a redevelopment of the site that would include approximately 500 housing units. If the plans go forward on the UC Site, it could increase the number of housing units in the neighborhood. The UC proposal is the subject of an independent environmental review. A preliminary assessment of the impacts of these additional housing units was made for the transportation analysis (see page 4-207 of the DEIR for a discussion of the travel demand assumptions regarding the UC site and pages 4-212 to 244 of the DEIR for a discussion of the transportation impacts).

X-3

The projected population growth associated with the addition of 4,440 housing units would be 7,620 additional residents in the Project Area by 2025, rather than 10,000 as stated by the commentor (see page Table 4-2, page 4-67 of the DEIR for the population projects for the Project Area). As noted in Response to Comment X-1 one of the primary goals of the Plan is to increase the amount of housing in this urban neighborhood that is already well-served by transit and close to the downtown employment center. This approach is in keeping with the objectives and policies of the *San Francisco General Plan.* By introducing infill housing on sites that can accommodate new development, the City is able to provide housing in a dense urban environment that has a high level of transit services. This is an efficient use of resources from an environmental perspective and contributes to the high level of pedestrian activity on the street that occurs when there is a mix of residential uses and neighborhood serving businesses.

It is not the role of the EIR to justify policy that is recommended in the Plan; the role of the EIR is to analyze the potential impacts of the policy proposals. Decision makers will decide the wisdom and the justification of the policies.

X-4

See Response to Comment U-6 regarding vehicle ownership in the Project Area.

X-5

Future 2025 traffic conditions related to the Central Freeway and the adjustments to existing volumes to account for the demolition of the Fell Street off-ramp and rerouting of traffic to city

streets are included as part the 2025 without Plan Travel Projections and 2025 with Plan Travel Projections (see pages 4-212 to 4-214 of the DEIR).

The traffic counts have been updated since the opening of the new freeway ramps and the new Octavia Boulevard. The new data is summarized in Response to Comment U-2.

X-6

See Response to Comment S-3 regarding the assessment of parking impacts.

X-7

As stated on page 4-207 of the DEIR, adjustments to the model-generated growth rates were conducted for the development of 2025 without Plan turning movement volumes. These volumes include a manual overlay of vehicle-trips to account for the additional traffic on the new Octavia Boulevard (in conjunction with the future on- and off-ramps for US 101). Subsequent to the DEIR additional count data was collected to verify the shifts in traffic patterns related to the opening of Octavia Boulevard (see Response X-5). Although the existing conditions in the DEIR were established prior to the opening of these new facilities, the shifts assumed as part of future conditions are consistent with the updated traffic count data and therefore are accounted for in the determination of Plan-related impacts.

X-8

The Muni and Regional transit screenline analysis presents the most recent data available and is consistent with the traffic operations analysis prepared for existing (Year 2004) and future 2025 condition, with and without the Plan. The 2025 future conditions are based on long-term trends of transit ridership and service (see page 4-224 of the DEIR). Although Muni ridership and service may have short-term variations occurring within individual years and existing transit service on a given day may appear crowded, long-term estimates are based on future capacity (such as the new Third Street light rail and Central Subway) and estimated increases in ridership demand. Transit ridership and capacity under future 2025 conditions with and without the Plan are presented in Table 4-21 page 4-225 of the DEIR.

X-9

See Response to Comment O-1 for recommended changes in the height limits at Market and Van Ness Avenue.

The proposed height limits of 400 feet are proposed only in the vicinity of the Market Street/Van Ness Avenue intersection, where maximum height limits of 320 feet currently exist. As noted on page 4-98, paragraph three of the DEIR, at this intersection, height limits would allow slender towers of up to 400 feet (except for the area directly over the BART tube), with heights stepping down to accommodate towers of 250 feet at the intersection of Mission Street/Otis Street/South Van Ness Avenue. Toward SoMa West's southern boundaries, building heights would step down to 85 feet. High-rise towers ranging in height from 200 to 400 feet already exist in this neighborhood, as noted in the last paragraph of page 4-98 of the DEIR.

The purpose of the increased height limits around the Market Street/Van Ness Avenue intersection, is to maximize new housing opportunities along major streets in the portion of the Project Area that already has high-rise housing and office structures and where the new development would be most compatible with the existing neighborhood character. In the portions of the project area that are more intensely residential and are supported by neighborhood serving commercial uses, for example, Hayes Valley, Duboce Triangle, and the Inner Mission, the heights would be 55 feet or less except along Market Street, where a uniform height limit of 85 feet would extend from Franklin Street to Church Street, and north of Duboce Avenue.

X-10

Comment regarding the use of the word vibrant is noted.

X-11

See Response to Comment X-3 regarding the consistency of the Plan policies for densification with the overall objectives and policies of the *General Plan.*

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
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Flex your power!
Be energy efficient!

August 11, 2005

SF101141
SF-101-R5.07
SCH# 2004012118

Ms. Rana Ahmadi
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Ms. Ahmadi:

Market and Octavia Neighborhood Plan – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above-referenced project. We have reviewed the draft Environmental Impact Report for the Market and Octavia Neighborhood Plan and forward the following comments:

The Market/Octavia and Oak/Octavia intersections show increased delay under "Plan" conditions compared to "Without Plan" conditions. It is not clear how this increased delay would impact the operation of the new Market/Octavia freeway ramps, particularly the off-ramp. We would like to see information regarding traffic impacts to the ramps. Y-1

The traffic data in Appendix C indicates that the Fell-Octavia intersection operation is expected to be significantly better than Oak/Octavia intersection operation. Since much of the freeway-related traffic that travels through the Oak/Octavia intersection is likely to also travel through the Fell/Octavia intersection, it seems odd that one intersection would operate significantly better than the other. Please provide intersection turning volumes for each of the intersections that were analyzed. Y-2

Should the installation of a signal(s) at a State Highway intersection be cited as a mitigation measure, at least one traffic signal warrant from the Manual of Uniform Traffic Control Devices (MUTCD) will have to be satisfied at said intersection before the placement of a signal will be considered. Further, a copy of the signal warrant analysis must be included for our review. Y-3

Should you require further information or have any questions regarding this letter, please call Alice Jackson of my staff at (510) 286-5988.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: Scott Morgan (State Clearinghouse)

Letter Y – Timothy C. Sable, California Department of Transportation

Y-1

See Response to Comment U-2 regarding the updated traffic data collected subsequent to the opening of the new Central Freeway ramps and Octavia Boulevard.

Under 2025 future conditions with and without the Plan, operating conditions at the intersections of Market Street/Octavia Boulevard/McCoppin Street and Oak Street/Octavia Boulevard would remain similar during the PM peak hour. The intersection of Market Street/Octavia Boulevard/McCoppin Street would operate at LOS E both with the Plan and without the Plan with average delays increasing around 10 seconds with the Plan. The average delays for the freeway on- and off-ramp approaches with the Plan would remain similar to 2025 without Plan conditions and would operate at the same LOS.

Subsequent to the DEIR, additional count data was collected in November 2005 to determine existing shifts in traffic patterns related to the Octavia Boulevard freeway touchdown. These existing counts were applied to background growth rates developed from the model (as documented in the DEIR) and compared to future 2025 volumes without the Plan. The attached transportation appendix presents detailed figures and count survey information. As a result, these latest counts were consistent with assumptions based on output from the San Francisco County Transportation Authority's (SFCTA) travel demand model for future 2025 Conditions.

The intersection of Oak Street/Octavia Boulevard would operate at LOS E both with the Plan and without the Plan with average delays increasing less than 10 seconds with the Plan. Average delays for individual approaches with the Plan would also remain similar to 2025 without Plan conditions including those approaches which would direct traffic to northbound and southbound Octavia Boulevard. Additional details of the traffic analysis can be found in the *Market & Octavia Plan EIR Transportation Study – Final Report*, dated May 31, 2005 (available for public review by appointment at the Planning Department, 1660 Mission Street, Fifth Floor).

Y-2

Under future 2025 conditions (with and without the Plan), the level of service differences between

the intersections of Oak Street/Octavia Boulevard and Fell Street/Octavia Boulevard may be related to the roadway configuration and the conflicting movements of inbound and outbound traffic during the PM peak hour. The intersection of Fell Street/Octavia Boulevard has two major movements, the northbound left-turn and the westbound through (each approach has around 1,400 to 1,600 vehicles during the PM peak hour under future 2025 conditions). In comparison, the intersection of Oak Street/Octavia Boulevard has several major movements including the eastbound through, eastbound right-turn and the northbound through (each approach has around 1,000 to 1,700 vehicles during the PM peak hour under future 2025 conditions). The intersection of Oak Street/Octavia Boulevard has a southbound approach and the intersection of Fell Street/Octavia Boulevard does not. As such, compared to the intersection of Fell Street/Octavia Boulevard, average delays at the intersection of Oak Street/Octavia Boulevard are likely worse due to the major conflicting movements and the additional southbound approach. Details of the traffic analysis including intersection turning volumes can be found in the *Market & Octavia Plan EIR Transportation Study – Final Report*, dated May 31, 2005 (available for public review by appointment at the Planning Department, 1660 Mission Street, Fifth Floor).

Y-3

Comment that installation of a traffic signal at a state highway would require that state signal warrants be met is noted. Of the 32 study intersections, Duboce Avenue/Church Street is the only unsignalized intersection. Since this unsignalized intersection would be considered to operate satisfactorily (the worst approach would operate at LOS B under existing conditions and LOS C under 2025 future with and without the Plan), no mitigation measures for signalization were proposed as part of the DEIR. As such, the unsignalized intersection of Duboce Avenue/Church Street would not meet the signal warrant criteria.

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Jan Boel
Acting Director

August 12, 2005

City & County of S.F.
Dept. of City Planing

AUG 16 2005

OFFICE OF
ENVIRONMENTAL REVIEW

Rana Ahmadi
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: Market and Octavia Neighborhood Plan
SCH#: 2004012118

Dear Rana Ahmadi:

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 August 11, 2005, 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."

Z-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,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2004012118
Project Title Market and Octavia Neighborhood Plan
Lead Agency San Francisco Planning Department

Type EIR Draft EIR
Description Establish a mixed-use transit-oriented neighborhood in an existing moderate density urban neighborhood.

Lead Agency Contact

Name Rana Ahmadi
Agency San Francisco Planning Department
Phone (415) 558-5966 **Fax**
email
Address 1660 Mission Street, Suite 500
City San Francisco **State** CA **Zip** 94103

Project Location

County San Francisco
City San Francisco
Region
Cross Streets
Parcel No. 89 Assessor's Blocks
Township **Range** **Section** **Base**

Proximity to:

Highways 101 North, I-280, I-80
Airports
Railways Muni Metro Railway / BART
Waterways
Schools John Swett and John Muir ES, SF Low School
Land Use Existing residential and commercial with 17 use districts; proposed residential land commercial with three new use districts.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 2; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Department of Housing and Community Development; Office of Emergency Services; Office of Historic Preservation; Department of Fish and Game, Region 3; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Department of Toxic Substances Control

Date Received 06/28/2005 **Start of Review** 06/28/2005 **End of Review** 08/11/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter Z – Terry Roberts, State Clearinghouse and Planning Unit

Z-1

Comments regarding state environmental regulations and reviewing agencies are noted.

Duboce Triangle Neighborhood Association
Eureka Valley Promotion Association
Merchants of Upper Market and Castro
c/o PMB # 301
2261 Market Street
San Francisco, CA 94114
(415) 267-1821

August 23, 2005

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: Draft Environmental Impact Report, Market and Octavia Neighborhood Plan

Dear Mr. Maltzer,

Forwarded for your inclusion in the Administrative Record are comments on the Draft Environmental Impact Report (DEIR) submitted by the Duboce Triangle Neighborhood Association (DTNA), the Eureka Valley Promotion Association (EVPA) and the Merchants of Upper Market and Castro (MUMC).

The California Environmental Quality Act (CEQA) sets the minimum standards for the notification of parties impacted by the changes indicated in a DEIR and establishes a minimum 45-day review period for those impacted to respond with Public Comment. As a minimum, CEQA requires written notification sent by U. S. Mail to all affected parties. This was not performed. On August 8, 2005, the San Francisco Planning Department (Planning Department) was notified of the defective notice and subsequently provided a two-week extension to the public comment period. However, the Planning Department has not met the legal requirements for public notice, which impacted the residents and neighborhood groups' ability to perform a comprehensive review of the DEIR.

Additionally, DEIRs are customarily provided to local libraries and branch libraries of those neighborhoods impacted by a Plan for review by the general public. No DEIR has been provided to the Eureka Valley Branch Library for public review. Indeed, the one copy of the DEIR provided to San Francisco's Main Library was not accessioned until August 12th, 2005. This is three days after the original cut-off date stated for the receipt of public comment.

AA-1

Throughout the DEIR, proposed changes are couched with the terms "where there is neighborhood support." However, no neighborhood input was requested from the Upper Market neighborhoods during the development of the Plan. Nowhere in the DEIR is there a discussion of when this neighborhood support will be requested and to what level neighborhood support will be endorsed by the Planning Department. Neighborhood support is essential prior to the development of the new zoning regulations for these neighborhoods, not after the zoning regulations are incorporated into the City's Master Plan. On page 1-1, the Project Sponsor identifies the project level objectives for development of the Central Freeway parcels as "Provide redevelopment on the Central Freeway

AA-2

parcels that heals the physical fabric of the neighborhood and adds to its character and quality." During the development of the "Market and Octavia Plan" (Plan) is clear the intent of the Plan was addressed at the impacts to the Hayes Valley Neighborhood. The inclusion of the Duboce Triangle Neighborhood appears to have been a later addition to the Plan with no recorded outreach to the residents and with no input ever requested from the Upper Market neighborhood associations. The fact that all Upper Market neighborhood associations were not listed in the DEIR distribution is clear indication of the failure of community based planning and is a major flaw in the development of the Plan and subsequent DEIR analysis. AA-2

The envisioned Plan is an experiment in social engineering with no proven basis for success based on the stipulated goals. If this experiment does not succeed, the local neighborhoods are stuck with the results with no chance of correcting the errors brought about through defective planning and zoning. We do not have the luxury of "guessing" and "hoping" the yet to be identified impacts resulting from this Plan will be beneficial to the neighborhoods and the City. This Plan cannot be a social experiment with unknown impacts and consequences. AA-3

The goals of the Plan will have the undeniable side effect of creating disharmony in the neighborhoods. The plan will create a neighborhood of the "haves" and the "have nots" and will increase the distinction between the rich and the poor. The "rich" will be able to afford housing with off-street parking. This is creating a social justice issue. San Francisco residents living in new affordable housing without off-street parking will be left, as one community member stated "to slug it out in the streets" while looking for available on-street parking. This impact to the neighborhood is untenable. AA-4

The Plan encourages both the construction of affordable housing without off-street parking and the conversion of existing garages in existing residential areas into housing units. The Plan is faulty by assuming "if you build new housing units without off-street parking, only those individuals without automobiles will purchase / rent those units." If indeed this were the case, people renting flats in the Upper Market neighborhoods would not have automobiles and currently there would be no off-street parking shortage in these neighborhoods. Clearly, this is not the case, proving the Plan is faulty in its assumptions. AA-5

A major component behind the rationale of the Plan's rezoning is to encourage the development of affordable housing along existing transit routes. However, the Plan never analyzes, given current property values, if affordable housing could ever be built within the Plan Area. This is a major omission in the DEIR analysis. AA-6

The Plan totally ignores the small businesses located within the Plan Area. The rezoning within the Plan Area will displace small business owners with little likelihood they will be able to afford increased rents in new retail storefronts. The Plan also totally ignores the adverse financial impact on local small businesses due to increased demand for on-street parking from new residential units, which will force shoppers to go elsewhere. This negative financial impact is a major omission in the DEIR analysis. AA-7

The Plan assumes mitigation will be available from the future actions ot other agencies, such as MUNI. The DEIR must address these assumptions and identify impacts if these assumed mitigation plans are not implemented. There is no guarantee that MUNI will be in a position to fund the new capital programs required for mitigation. AA-8

Section 3.1, Project Sponsors' Objectivess, is clearly written around the objectives to "repair and rejuvenate" the neighborhood. This is clearly an objective for repairing and rejuvenating a AA-9

neighborhood long impacted by the now-demolished Central Freeway. The Upper Market neighborhoods do not need repair and rejuvenation. AA-9

The Plan further states it will function as a model for reweaving the urban fabric in other neighborhoods that are interested in amplifying the benefits of a vibrant transit-oriented settlement pattern for such neighborhoods. The Upper Market Neighborhoods to not need reweaving....their threads were never unraveled. The Plan indicates it would function as a model for "other neighborhoods that are interested." The Upper Market neighborhoods have not been given a choice. These proposed new zoning requirements have been implemented with no public input from the Upper Market neighborhoods, clearly in violation of the stated intentions of the Planning Department and in violation of CEQA. AA-10

Section 3.3, Project Location, identifies and discusses the Civic Center, Hayes Valley, SoMa West and the Mid-Market Redevelopment Plan Area but totally neglects any discussion of the Duboce Triangle Neighborhood, Eureka Valley Neighborhood and Upper Market, which comprise a significant percentage of the overall Plan. This is an overly blatant disregard for the unique aspects of these neighborhoods, which do not fit the stated Project Sponsors' Objectives identified in the Plan. This again reinforces the Planning Department's objective: this Plan has been developed for the community needs of Hayes Valley, not the communities' needs of Upper Market. Section 3.4, Project Characteristics, identifies objectives solely attributable to the changes in Hayes Valley due to the Octavia Boulevard construction. Where are the Project Objectives for Upper Market Neighborhoods? There are none. AA-11

On Page 4-6, Section 4.0, the objectives of the Housing Element. Policy 1.1 states, in part, "Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood scale and character **where there is neighborhood support.**" (Emphasis added by the author.) Changing zoning in the Upper Market neighborhoods with no input from the residents does not constitute "neighborhood support." If indeed "neighborhood support" is a true objective of the Plan, the zoning code changes must reflect neighborhood input and control over the future redevelopment in the Upper Market neighborhoods. The proposed zoning changes for the Upper Market neighborhoods have been developed in a vacuum with no neighborhood input. The Plan's new allowable densities proposed for the Upper Market established are not compatible with prevailing neighborhood scale and character. Due to the total lack of Upper Market neighborhood involvement in the development of the Plan, no neighborhood support exists for this Plan as proposed. AA-12

On Page 4-22, the Better Neighborhood Program identifies eight elements, which define a great neighborhood. In Paragraph 3, one of the elements states: "Getting Around Easily: Many choice that make it easy to move about on foot, by bicycle, transit and auto; cars are accommodated, but allow people to leave easily without one." Though this element states that cars are accommodated, the Plan actually makes every effort not to accommodate cars. AA-13

On Page 4-23, the first of the stated Residential Design Guidelines states "Ensure that the building's scale is compatible with surrounding buildings." Increasing the allowable building heights along Market Street is not compatible with maintaining the scale of the adjacent residential properties that back up to Market Street properties. The third of the stated Residential Design Guidelines states "Maintain light to adjacent properties by providing adequate setbacks." There is no mention in the Plan on providing adequate setbacks next to existing residential properties which will back up to Market Street properties. AA-14

The sixth of the stated Residential Design Guidelines states "Ensure that the character defining features of an historic building are maintained." However, the plan fails to include maintaining the character of historic neighborhoods. Several elements of the plan will have a AA-15

negative impact to the historic character of a neighborhood, such as encouraging property owners to convert existing garages to housing units. While installing garages into Victorian buildings does impact the character of the building, the conversion of garage openings for a residential unit is anathema to maintaining the character of a Victorian neighborhood. AA-15

On Page 4-64, Section 4.3.1, Population: The DEIR makes the statement that population growth was "likely to have taken place" between 2000 and 2004. San Francisco's population has recently significantly decreased, so assuming an increase in population in this area is in error. Employed Residents: The DEIR does not make any attempt to identify the percentage of Plan residents who commute to jobs outside of San Francisco. This calculation is necessary to determine the adequacy of both off-street and on-street parking requirements. AA-16

On the top of Page 4-66, the DEIR states "CEQA Guidelines state that an economic or social change by itself would not be considered a significant effect on the environment." In effect, CEQA is stating that social change, in combination with other impacts, must be considered significant. The Plan will create social change due to higher density of housing and crowded living conditions, increased traffic, increased noise, increased air pollution and increased demand of public services. The DEIR does not address the social changes the Plan will create. AA-17

On Page 4-66, under the discussion of Population, the Plan increases the population within the Project Area by 26% and would account for 11.7% of the citywide population growth in 2025. However, the current population of the Project Area accounts for only 3.5% of the total San Francisco population. The residents of the Project Area are being required to absorb an inordinate share of overall City growth over the next twenty years, leading to further congestion in already congested neighborhoods. The DEIR does not address the distribution of population growth throughout the City's transit corridors to determine those neighboehoods that would be least impacted by higher density development, as well as those neighborhoods more suitable for development. AA-18

On the bottom of Page 4-68, the DEIR states "The Plan would not induce substantial growth of population..." However, on Page 4-66, the DEIR states the population within the Project Area will increase by 26%. This is substantial growth in already congested Upper Market neighborhoods with no significant undeveloped land available for development. The DEIR is flawed in this analysis. AA-19

In the middle of Page 4-69, the DEIR makes statements that housing will become more affordable by reducing housing and household costs associated with driving, with further "measures" which will reduce the cost of parking from the cost of housing. These statements are based upon assumptions, not fact. The DEIR does not provide any studies nor documentation upon which these conclusions are based. AA-20

On Page 4-71, the DEIR discusses the displacement of residents due to demolition of existing properties to maximize the potential development of the site. However, the DEIR does not address the displacement of small businesses, which will result due to demolition of older, smaller commercial properties. It is the presence of these small businesses which add to the character and livability of the Upper Market neighborhoods. The DEIR does not address the ability of displaced small businesses to relocate their businesses into newly built commercial spaces, nor the affordability of new commercial spaces for the small business owners. The impacts of the Plan to small business is totally ignored. AA-21

On Page 4-75, computer generated visual massing studies were generated. However, only two of those studies were included in the DEIR, Figure 4-14. These studies provides a false sense of the actual impact to the neighborhood by providing "wire-frame" outlines of the proposed height and bulk districts. By making these "buildings" transparent, the true impact of the proposed height and bulk AA-22

districts is not apparent. In lieu of "wire-frame," the transparent boxes should be filled with a gray color similar in tone to the existing building. This will present a more accurate reflection of the severe visual impact to the surrounding neighborhood. The computer generated visual massing studies are flawed. AA-22

On Page 4-96, the discussion of "Light and Glare" neglects to identify streetlights as a major source of light and glare in the Project Area. AA-23

On Page 4-97, the discussion of "Visual Character" states building heights within Duboce Triangle would range from 30 feet to 50 feet. There is no comparison to existing zoning regulations relating to height limitations, making any analysis of impact to visual character flawed. The DEIR further states a 65-foot height limitation on Market Street west of Church Street. Again, there is no comparison of the Plans height to existing zoning regulations, again making any analysis of impact to visual character flawed. AA-24

On Page 4-99, the DEIR states "Aside from design considerations and physical impacts related to building height (e.g. potential view obstructions and shading)." The DEIR neglects to identify the impact that massing and shading will have not only upon the visual character of a Victorian neighborhood, but upon the visual character of the new construction in relation to the immediately adjacent Victorian residential and commercial buildings. AA-25

On Page 4-100, the DEIR states "it can reasonably be concluded that the proposed buildings themselves would not result in a substantial, demonstrable negative aesthetic effect on the existing visual character or quality of the area and its surroundings." This is an incorrect assumption by the DEIR author with no basis of fact. Visual quality of the neighborhood will be impacted with the increased zoning height. Rremoval of two and three story buildings along Market Street and their replacement with six story buildings will have an impact on the visual quality of an adjoining Victorian neighborhood. The rezoning of residential neighborhoods to increase density will have a substantial, demonstrable negative aesthetic effect on the visual character and quality of the Upper Market neighborhoods. The DEIR author's admittedly subjective conclusion is not valid and is not based on any analysis or fact. The DEIR conclusion is faulty. AA-26

On Page 4-102, discussion is made of the redevelopment of the Safeway site, accompanied by Figure 4-15 which attempts to show the impact of new zoning on that site. Once again, the "wire-framing" of the outline of the proposed building gives a false sense of the visual impact at that location. In lieu of "wire-frame," the transparent box should be filled with a gray color similar in tone to the existing building. This will present a more accurate reflection of the severe visual impact to the surrounding neighborhood. The computer generated visual massing studies are flawed. AA-27

4.6 Historic Resources

No post 1850 History is detailed for the Duboce Triangle Neighborhood contained within the boundaries of the Market and Octavia Plan area. A history of the patterns of settlement and development is lacking for the Duboce Triangle Neighborhood. AA-28

A new map is needed in the DEIR, which indicates the age of buildings contained within the boundaries of the Plan area; this map will also show the concentration and density of historic resources that exist within the boundaries of the proposed Market and Octavia Neighborhood Plan. The Duboce Triangle Neighborhood Association is particularly interested in mapping the concentration of historic resources that exist within the sub-boundaries of the Duboce Triangle AA-29

Neighborhood, as well as the concentration of historic buildings located in all of the other surveys areas identified and not identified in this document

AA-29

The DEIR fails to address and recognize that the area contains approximately 1,000 buildings, a bulk of which are more than 50 years of age and a high percentage of which are more than 100 years of age, pre-dating the 1906 Earthquake and Fire. The plan completely fails to address the historic and architectural significance of this neighborhood, which contains a variety of housing types, mixed used properties and neighborhood commercial businesses.

AA-30

Further analysis of the built environment in Section 4.6: Historical Resources Section is needed for the Duboce Triangle, Hayes Valley and Mission Dolores areas contained within the Plan boundaries to determine the potential quality and quantity of historic resources which have not been surveyed and yet are significant resources on the local, state and potentially on the national levels.

AA-31

Impact Analysis

4.6.3: Architectural Resources

While the Architectural Context does address and summarize much of the historic resources survey work that has been conducted to date within the Plan area boundaries, it does not provide a framework for the 800 to 1,000 buildings located within the Duboce Triangle neighborhood which contain approximately 1,800 residential units nor does it address historic resources that are extant in the Mission Dolores area, also contained within the Market and Octavia Plan boundaries.

AA-32

Comprehensive historic resources survey work is needed in these two sub areas identified within the Plan boundaries prior to adoption and implementation of the Plan. These sub areas of the Plan contain a significant concentration of historic resources, which have a high degree of integrity and appear eligible for listing on the California Register of Historic Resources and the National Register of Historic Places. Survey work will most likely reveal a number of individually eligible buildings, structures and objects, as well as a number of potential historic districts which a strong concentration of contributory resources.

AA-33

Cumulative Impacts

Additional information is needed within the Cumulative Impacts Section to address the potential impacts of increasing the height zones along Upper Market Street from 41-85 feet to 65-85 feet essentially from Franklin Street all the way to Noe Street on the north and south sides of Market Street.

These proposed changes in the height and bulk districts might seriously effect and impact the light, air, view corridors and shadow the rear yards of hundreds of residential buildings, which abut the Neighborhood Commercial Districts on the north and south sides. These Proposed Generalized Height Districts are depicted in Figure 4-4. No analysis is provided as to the potential substantial adverse impact of this reclassification and the potential negative effects that would occur to adjacent small-scaled residential structures.

AA-34

5.0 Mitigation Measures

On Page 4-184, the DEIR analysis assumed daily peak hour traffic occurred between 5:00 and 6:00 PM. Daily peak hour traffic in the Duboce Triangle Neighborhood also occurs during the morning

AA-35

commute, generally from 7:00 to 9:00 AM. Thus, the analysis of additional traffic during peak hour traffic conditions is flawed. AA-35

On Page 4-188, levels of Muni service are stated. Recent budget deficits have resulted in a reduced level of Muni service throughout the Project Area. The DEIR analysis cannot assume the current level of service will continue, and indeed must reflect projected budget shortfalls and possible impact to future Muni service. The DEIR is deficient in assuming a future level of service matching a 2004 baseline, when already in 2005 the service level has been decreased and most likely will decrease again in the future. AA-36

On Page 4-204, the second paragraph discusses the potential for parking deficits. The conclusions stated by the San Francisco Transportation Planners are without merit. If indeed their statements were fact, the existing deficit for parking throughout the neighborhoods would not exist. The conclusions are flawed and are based on supposition; an analysis must be based on the current residents' parking patterns. AA-37

On Page 4-204, the third paragraph utilizes words such as "assuming," "typically," and "may" to justify the conclusion that parking deficits would have a minimal impact to the environment. This is a statement made without any analysis of existing parking deficits, with no threshold of significance established. AA-38

On Page 4-210, the third paragraph states the parking demand study does not include the parking demand associated with other land uses in the Project Area. Their analysis is shortsided to not identify other land uses in the Project Area. AA-39

On Page 4-210, the fourth paragraph determines parking demand based on current needs in the existing neighborhoods. This does not address current property ownership patterns in the neighborhoods, in with many residential units are rental property. The probable buyers of the new residential housing which will be from a different socio-economic base than current renters and are more likely to own automobiles than will renters. Therefore, the analysis is flawed. AA-40

On Page 4-221, Table 4-20 establishes a traffic volume for "existing year" which is assumed to be 2004. The table indicates the traffic volume throughout the project area will increase by approximately 1700 cars. However, the CEQA requires the analysis to include cumulative impacts from other sections of the City that would also have an impact on these intersections. This analysis does not appear to have been performed. AA-41

On Page 4-224, Muni Screenline Analysis assumes transit improvements will occur in the Project Area and the resulting impact of the new residential units will be minimal. The majority of the Muni improvements mentioned in this section are not in the Project Area. Given current Muni budget shortfalls, it is imprudent to assume future transit improvements within the Project Area. The analysis also fails to analyze current Muni service levels and how Muni will be impacted when residential growth occurs in the Project Area without any resulting increases in the Muni service levels. AA-42

On Page 4-232, the DEIR addresses parking impact under the "no minimum space" concept and states the off-street parking occupancy in the Project Area would increase to over 100 percent capacity. The current off-street parking occupancy is already over 100 percent capacity. The DEIR cannot fail to address parking impacts once the 100% threshold is reached as if to imply that parking cannot get worse. The DEIR needs to address the actual impact to off-street parking occupancy; for example, under the "no minimum space" concept, the demand for off-street parking will increase from the AA-43

current condition in excess of 100 percent to a new condition of perhaps 150 to 200 percent of currently available off-street parking occupancy. The DEIR analysis fails to study the actual impact. AA-43

On Page 4-234, paragraph 3 states parking shortfalls relative to demand are not considered significant environmental impacts.....but are not considered significant impacts on the environment. However, inadequate off-street parking occupancy will create a social impact. CEQA states that social change, in combination with other impacts, must be considered a significant effect on the environment. AA-44

On Page 4-237, the DEIR is again flawed by analyzing parking demand based on current levels of automobile ownership in the surrounding neighborhoods. As stated earlier, the DEIR cannot assume that the levels of vehicle ownership of mostly renters will be the same level of vehicle ownership of mostly owners of expensive new housing. This analysis is flawed. AA-45

On Page 4-238, the DEIR assumes City CarShare will still be viable in 2025. However, the DEIR fails to address the impact to parking if City CarShare (or a similar program) fails to exist in future years or if adequate parking for City CarShare use cannot be provided. AA-46

On Page 4-257, the DEIR recognizes carbon monoxide will increase in the Project Areas but concludes there will be no impact due to future State and Federal programs for reducing automobile air emissions. The DEIR cannot assume uncertain and unknown programs that might mitigate this impact. AA-47

On Page 4-277, the DEIR summarizes that noise impacts to the Project Area are not considered a significant cumulative noise impact. The DEIR fails to analyze the incidental noise impacts due to the increased density of residential housing, such as increased garbage pick-ups, blaring car horns and car alarms. And while the City does indeed have a Noise Ordinance, the violations to the Ordinance are not enforced and future enforcement should not be assumed as a rational for reducing noise impact and noise mitigation. The DEIR analysis of noise generation, noise impacts and mitigation are flawed. AA-48

On Page 4-318, the DEIR states the Plan proposes to create to new parks and open space amenities within the Project Area. These new parks are not located in nor near Duboce Triangle; therefore, the impact to the open spaces in Duboce Triangle is not mitigated by the construction of new parks in another neighborhood. The DEIR also neglects to address planned changes to existing parks (such as dedicated dog play areas and capital programs) which will reduce the availability of parks' common areas for use by the new residents in the Project Area. AA-49

On Page 4-337, the DEIR states the Plan will not represent a significant growth in population, employment or housing in the citywide context as a whole. What the DEIR fails to address is the fact that the Plan will represent a significant growth in population and housing in the Project Area. Therefore, the DEIR is flawed in not addressing the impact of direct growth to the impacted Project Area. AA-50

On Page 4-338, the DEIR assumes a shift of existing workers and residents within the region to the new residential housing provided in the Project Area, with resulting regional benefits to air quality and traffic impacts. This analysis is flawed in that it assumes there will be no new job growth in San Francisco. If indeed current San Francisco workers move to San Francisco, the new job growth in San Francisco will likely be performed by new employees not residing in San Francisco. AA-51

CHAPTER 5.0 MITIGATION MEASURES

5.2 Land use and zoning: There are significant impacts to the Upper Market neighborhoods due to the rezoning for both height and density. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-52

5.3 Population, Housing, and Employment: There are significant impacts to the Upper Market neighborhoods due to the increased density and the associated impacts to the Upper Market Neighborhoods. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-53

5.4 Urban Design and Visual Quality: The Duboce Triangle Neighborhood Association is flabbergasted with the conclusion that "No Mitigation Measures have been included because no significant impacts have been identified at the program or project levels. AA-54

This Plan proposes substantial changes to the height and bulk districts along the Market Street corridor from Van Ness Avenue to Noe Streets, as stated above which could result in substantial demolition of yet to be identified historic resources and result in the merger of parcels for large high density residential towers over commercial space with less than one for one parking ratios. The DEIR does not contain any visual analysis of existing and proposed conditions. Photomontages are needed at key intersections and locations which will depict existing conditions and proposed conditions in the years 2010, 2015, 2020 and 2025 when 4,400 new residential units are proposed to be added to the City's housing stock. AA-55

5.5 Shadow and Wind: There are significant impacts to the Upper Market neighborhoods due to the increased density and the associated impacts to the Upper Market Neighborhoods. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-56

5.6 Historic Resources: This DEIR contains approximately ten (10) pages devoted to archeological resources as well as the related archeological testing and monitoring procedures for archeological resources contained within the Plan area boundaries which appears to complete and comprehensive in its detail and scope.

However, this DEIR, under the Section 5.6.B: Architectural Mitigation Measures states "No Mitigation Measures have been included because no significant impacts have been identified at the program or project level." AA-57

This conclusion needs further explanation and clarification. The DEIR identifies a number of historic districts, surveys and landmarks located within the boundaries of the Market and Octavia Neighborhood Plan area, which could be adversely impacted by the future growth and development proposed by the Plan.

In addition, the Plan does not recognize potential historic resources in the Duboce Triangle area or in other areas located within the Plan boundaries.

The Duboce Triangle Neighborhood Association wishes to go on record to indicate that the substantial changes prescribe by the implementation of the Plan in the next twenty years will substantially change the character and historic significance of the Duboce Triangle. AA-58

The Plan does not take into account the concept to reduce or remove the current minimum parking requirements of one to one. One of the goals of the Plan is to permit more housing units within existing buildings, many of which are historically and/or architecturally significant. This would AA-59

result in severely compromising the architectural integrity of hundreds of late nineteenth and early twentieth century residential buildings extant with the Duboce Triangle and surrounding areas. AA-59

As a Mitigation Measure to this Plan adoption and implementation, it is strongly recommended that City fund and support comprehensive historic resources survey work for the Duboce Triangle Neighborhood. The Duboce Triangle Neighborhood Association has already requested that the Landmark Board of the City consider such a survey in its Work Program for the current Fiscal Year (2005/06). See Attachment A: *Landmarks Preservation Advisory Board Work Program Item for a Comprehensive Survey of the Duboce Triangle Neighborhood based upon the request of the Duboce Triangle Neighborhood Association (DTNA), dated August 17, 2005.* AA-60

A historic survey of the built environment is one of a number of Mitigations that need to be developed to address the impact of the Plan on the historic areas and neighborhoods identified in the Market and Octavia Neighborhood Plan.

In addition, the neighborhoods that have not been surveyed request notification and input on the development of a new set of Residential Design Guidelines, which are being proposed for the Plan area boundaries. The Duboce Triangle Neighborhood Association is particularly interested in working with the Planning Department in the development of specialized guidelines for historic buildings and unique and unusual public open space and right-of-ways located within the Duboce Triangle area. AA-61

5.7 Transportation: There are significant impacts to the Upper Market neighborhoods due to the increase in traffic and it's associated impacts to the Upper Market Neighborhoods. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-62

5.8 Air Quality: There are significant impacts to the Upper Market neighborhoods due to the increased density and the resulting impact to air quality in the Upper Market Neighborhoods. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-63

5.9 Noise: There are significant impacts to the Upper Market neighborhoods due to the increased noise and the associated impacts to the Upper Market Neighborhoods. The DEIR is defective by not establishing the threshold of significance for determining these impacts. AA-64

7.0 PROJECT ALTERNATIVES

The DEIR is defective in that it identifies only one project alternative. The lack of alternatives clearly shows the Planning Department's intention of proceeding with the current Project Plan without totally investigating all possible alternatives to rezoning in the Project Area. AA-65

The DEIR improperly bases its analysis of the impacts associated with "2025 without Plan" and "2025 with Plan." This approach is improper under both CEQA and NEPA, which require the analysis of impacts to be based on existing physical environmental conditions in the affected area at the time the notice of preparation is published. The DEIR must include an analysis of the impacts of the alternatives with both the existing environmental conditions (at the time the NOP was issued) and with the No Project alternative. AA-66

CONCLUDING COMMENTS

The Neighborhood and Business Groups appreciate the opportunity to comment on the Draft Environmental Impact Report for the Market and Octavia Neighborhood Plan. Please keep the individuals listed below informed of any and all upcoming matters related to this Plan.

Sincerely,

Gregg Wilcox
President
Duboce Triangle Neighborhood Association

Adam Hagen
President
Eureka Valley Neighborhood Association

Paul Moffett
President
Merchants of Upper Market and Castro

Landmarks Preservation Advisory Board
Work Program Item for a
Comprehensive Survey of the
Duboce Triangle Neighborhood
Based upon the request of the
Duboce Triangle Neighborhood Association (DTNA)

Landmarks Board Work Program Public Hearing

August 17, 2005

ATTACHMENT A

SAN FRANCISCO

PRESERVATION BULLETIN NO. 19

POTENTIAL SAN FRANCISCO LANDMARKS EVALUATION FORM

The Landmarks Preservation Advisory Board (Landmarks Board) seeks suggestions from the general public on buildings, structures, sites, districts or objects potentially eligible for designation as future San Francisco historic landmarks.

San Francisco contains many older buildings that contribute to the overall architectural, aesthetic and urban design qualities of the city, in varying degrees. Some buildings are important solely based on their individual design attributes while others derive their worth from the history of their owners, occupants and uses. Some buildings may be significant more for their contextual association with surrounding properties. Buildings proposed for landmark designation may include both those of individual importance and those that taken as a whole are considered to be contributory elements to a neighborhood or district.

The Landmarks Board set in 1999 and reaffirmed in 2000 the following priorities for the selection of potential landmark designations:

- To directly address and engage the cultural and social history of San Francisco; and
- To go to neighborhoods that have not been represented and underrepresented in the program to date; and
- To involve communities of people (ethnic communities, communities of interest, cultural communities); and
- Public spaces / common grounds; and
- Architecturally significant buildings.

In order to assist the Landmarks Board in its evaluation, the following information should be provided on each potential landmark. Please provide as much information as possible as an incomplete application may affect consideration of landmark designation.

Note:
Generally, properties eligible for local landmark designation are at least 50 years old. Properties less than 50 years of age must be exceptionally important to be considered eligible for listing.
January 2003

Resource Name: Comprehensive Survey of the Duboce Triangle Neighborhood Association. (DTNA)

This comprehensive survey of the Duboce Triangle Neighborhood is being requested by the DTNA due to the fact that the recently published DEIR for the Market and Octavia Neighborhood Plans completely fails to address the impact of the Plan on the built environment contained within the aforementioned sub area of the overall Plan boundaries. The neighborhood contains approximately 1,000 resources with approximately 1,800 dwelling units and mixed used buildings along the Market Street corridor and within the boundaries of the area. (A map from the Market and Octavia Street Plan of the proposed boundaries of the survey area is attached for your information).

Historic Name (if known): Duboce Triangle

Address of Resource:

This area is generally bounded by Castro Street to the west (Divisadero from Duboce to Waller Streets), Market Street to the south (to Webster Street), Webster Street to the east (to Waller Street) and Waller Street to the north (between Webster and Divisadero Streets.

Block and Lot of Resource:

Multiple Property nomination, numerous blocks and lots.

Primary Contact: (Phone #)

Greg Wilcox, President, DTNA, 415.861.3741 (h)

Resource Date of Construction:

The neighborhood was largely built out in the late 19th century and the first half of the 20th Century.

Date(s) of Alterations/Additions to Resource:

1. **Is the resource associated with events that have made a significant contribution to the broad patterns of our history (local, state or national)? If so, how?**

The Duboce Triangle neighborhood was originally part of a vast area of the City, which was known as the Western Addition, which included all of the land west of

Van Ness Avenue that was annexed in 1851. "Much of the land was sand dunes; in fact, the area was named "The Great Sand Waste" on early maps. In the southern part of the Western Addition is Hayes Valley, recently renamed Mint Hill by residents eager to spotlight its revived Victorian homes. The neighborhood namesake is the Federal Mint, a large granite mass that dominates the view from the south. Right next to Mint Hill is the Duboce Triangle, at the junction of Market, Castro and Duboce Streets. The two neighborhoods join at Duboce Park, which early photographs show laid out in rows as a vegetable garden, before it was dedicated as public land in 1900." [1] The four-acre Duboce Park was once a mound-dotted wasteland on which tons of rock had been dumped. The park is now framed by housing and provides much needed open space for the densely populated Duboce Triangle neighborhood.

2. **Is the resource associated with the lives of persons significant in our past (local, state or national)? If so, how?**

Comprehensive survey work for the Duboce Triangle will most certainly reveal persons and events significant on the local and state levels and possibly on the national level as well.

3. **Does the resource embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction? If so, how?**

The Duboce Triangle neighborhood contains a variety of architectural styles and building types, which represent patterns of development of the City in the late 19th and early 20th Century history of the City. San Francisco houses in this neighborhood and in surrounding neighborhoods were more elaborately ornamented than other Bay Area communities and reflected the wealth of the middle classes and the a thriving urban area. "At the beginning of the 20th century styles became more subtle as society stabilized. Despite the havoc wreaked by the fires of the 1906 earthquake, a great number of these houses are still standing today. Visitors can therefore see for themselves that the stylistic diversity is restricted to the facades and that, more often than not, the houses were decorated in a composite style based on a range of standard designs."[2]

The survey will document a rich collection of building styles and types including Victorian, Queen Anne, Italianate, Eastlake, late nineteenth century and early twentieth century Revival styles, Edwardian (Classical Revival), Commercial and Modern buildings.

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[1] Judith Lynch Waldhorn and Sally B. Woodbridge. Victoria's Legacy. San Francisco: 101 Productions, 1978, page 82.

[2] Knopf Guides, San Francisco, Alfred A. Knopf, Inc., New York: 1993, page 94.

Many buildings within this neighborhood are associated with known San Francisco architects and builders and possess high artistic value and embody distinctive characteristics of a type, period and methods of construction.

4. Has the resource yielded or may be likely to yield, information important in prehistory or history (local, state or national)? If so, how?

Prehistory and History prior to 1850 will be detailed in a fully developed Context Statement or Statement of Significance for the Duboce Triangle once the City determines that the proposed Survey is a priority in the Landmarks Board Work Program.

5. Does the resource possess integrity of location, design, setting, materials, workmanship, feeling, and association? If so, how?

Much of the building stock within the Duboce Triangle neighborhood maintains a high degree of integrity based upon the seven criterions listed in Question No. 5 and will be addressed through the survey process. It is anticipated that the survey would utilized DPR 523, State of California, Department of Parks and Recreation forms and would be consistent with the City's survey efforts that are currently underway or proposed for the next few years.

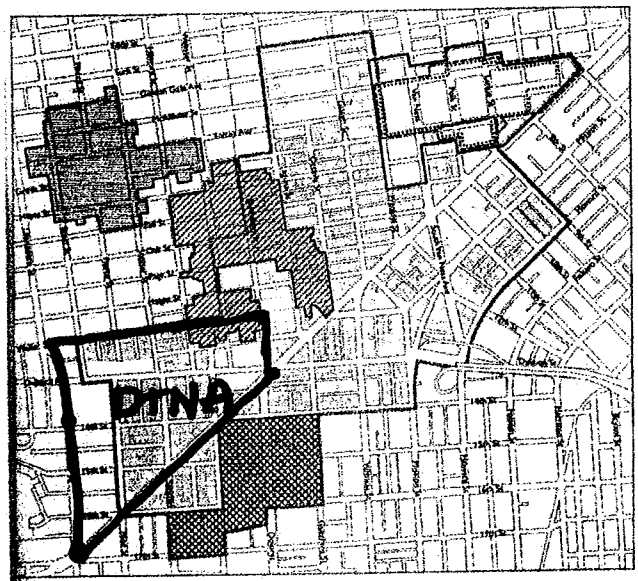


Figure 4-18
Archaeological and Historic Districts

Letter AA – Gregg Wilcox, Duboce Triangle Neighborhood Association
Adam Hagen, Eureka Valley Neighborhood Association
Paul Moffett, Merchants of Upper Market and Castro

AA-1

See Response to Comment D-2 for a summary of the public outreach effort during the development *Market Octavia Neighborhood Plan* and the DEIR.

An extensive public outreach effort was undertaken during the development of the Plan and a notice of the publication of the DEIR was sent out to all participants in the planning process and to neighborhoods affected by the proposed Plan by the Planning Department. Three copies of the DEIR were also forwarded to the San Francisco Main Library, though the Eureka Valley Library located at 3555 16th Street, just outside of the Project Area boundary, did not receive a copy. The Notice of Availability of the DEIR was advertised in the San Francisco Chronicle and on the Planning Department website. Hard copies or CDs of the DEIR were available at the Planning Department.

In one instance, the president of the Duboce Triangle Neighborhood Association had changed in the intervening period between the development of the Plan participant list and the notification of the DEIR publication. In response to the concern raised by this neighborhood group, the comment period deadline was extended for two weeks, from August 9, 2005 to August 23, 2005, allowing a total response time of 60 days. The minimum comment period required by CEQA is 30 days.

If a party still feels that they have serious concerns about the adequacy of the EIR or they have had inadequate time to comment on the DEIR, Chapter 31 of the San Francisco Administrative Code provides for an appeal to the Board of Supervisors subsequent to an action by the Planning Commission.

AA-2

See Response to Comment D-2 for a summary of the public outreach effort during the development of the *Market and Octavia Neighborhood Plan.*

Notice was mailed to property owners and residents for three of the public workshops and notice of

two of the public workshops were mailed directly to 120 to 150 neighborhood and community organization leaders. Representatives from the affected neighborhood organizations were invited to participate in these meetings. In addition, public flyers were posted along Market Street and throughout the neighborhoods notifying residents and business owners of the meetings and at different times throughout the process, representatives of the Planning Department actually went door-to-door visiting many of the businesses along Market Street to discuss the proposed Plan and ensure awareness of its impacts.

In addition to the general Plan meetings, the Duboce Triangle Neighborhood Association has had two presentations regarding the Plan and the DEIR at their regular neighborhood association meetings and representatives of their organization attended public meetings and workshops relating to the Plan. Neither the Eureka Valley nor the Merchants of Upper Market and Castro requested presentations by the Planning Department at their regular organization meetings prior to their publication of the DEIR. In November and December 2005, Planning Department staff was also available for open office hours in a neighborhood café to respond to questions associated with the Plan.

In addition to the specific Plan related meetings and notification procedures, a neighborhood or community organization can, at any time, request that they be included on a Planning Department list requesting copies of all environmental documents relevant to their neighborhood area. In this manner, neighborhood organizations are ensured that they receive timely information on proposals affecting their neighborhoods.

The Plan is not intended to merely focus on the parcels and the surrounding neighborhood affected by removal of the elevated Central Freeway in Hayes Valley and SoMa West. The intent from the inception of the Plan has been to focus on the opportunities for transit-oriented development centered around the two transit hubs located at Market Street and Van Ness Avenue and at Market and Church Streets. The Project Area was established by identifying a comfortable walking distance of approximately ¼ mile from each of these hubs. The Upper Market and Duboce Triangle neighborhoods were included from the outset, not as a later addition to the Plan.

The EIR distribution list included in Chapter 8.0 of the DEIR identifies those organizations and

individuals that received copies of the DEIR. In addition, other organizations, including the neighborhood organizations in question, received a notice of availability of the DEIR. See Response to Comment AA-1 above for additional clarification.

AA-3

It is not the role of the EIR to justify policy that is recommended in the Plan; the role of the EIR is to analyze the potential impacts of the policy proposals. Decision makers will decide the wisdom and the justification of the policies.

The Plan proposes an increase in density by the infill of housing in the Project Area. With the increase in population, the average density of the Project Area would be 97 persons per acre. There are already parts of the Project Area in Hayes Valley, between Fulton and Oak Streets, and the Inner Mission that have comparable levels of urban density. Other neighborhoods in the City such as Nob Hill, parts of North Beach, the Tenderloin, and Chinatown have population densities that are even higher, up to 155 persons per acre.[37] Historic development occurred in these neighborhoods with less than one to one parking required. These neighborhoods continue to be viable urban neighborhoods and auto ownership is lower due to the reduced availability of residential parking and the availability of transit and services in close proximity that permit residents to conduct their daily business without reliance on a car.

AA-4

Comment regarding social justice issue is noted. While economic impacts may be a factor for decision-makers when considering the adoption of the Plan, such impacts are not physical in nature and therefore are not required by CEQA to be included in a DEIR.

One of the main objectives of the Plan is to provide housing choices in the Project Area, with a combination of market rate and affordable units. One of the strategies for making housing units more affordable is to uncouple the cost of housing from the cost of providing parking and to allow residential units to be built without parking. It is an explicit intent of the Plan to give housing consumers a choice as to whether they chose to include parking as an independent cost from their

[37] 2000 US Census, US Census Bureau, Persons Per Square Mile for San Francisco.

housing purchase or rental agreement. This approach would reduce the cost of purchasing housing rather than forcing all housing consumers to pay for parking whether they own a vehicle or not. Also see Responses to Comments M-7 regarding mitigation measures intended to reduce traffic delays and U-18 regarding the purpose of the EIR.

There are many housing units today in San Francisco that exist without parking, particularly in the older, more dense neighborhoods east of Presidio Avenue where many of the census tracts have auto ownership rates of less than 1.0 cars per household. A Technical Memorandum on "Vehicle Ownership in San Francisco" prepared in November 2001 was conducted as part of the background studies for the *Market and Octavia Neighborhood Plan.*[38] The study indicated that many of the neighborhoods in northeastern San Francisco have auto ownership rates of less than one per household, both for owner occupied units and for rental units. The study found that there was a strong link between vehicle availability and income; the higher the income level, the greater the propensity to own a vehicle. The notable exceptions to this were the Nob Hill, Telegraph Hill, and North Beach neighborhoods where the combination of high levels of neighborhood services, location of the neighborhoods adjacent to major job centers, access to public transit, and high parking costs result in lower auto ownership rates. The strongest relationship to vehicle availability related to housing tenure. The census tracts with the lowest vehicle availability had predominantly rental units, while those with highest vehicle availability were composed of approximately 37 percent rental units.

AA-5

The decision to own a car is a balancing of the convenience of owning the car and the independent mobility provided by the automobile against the extent to which travel alternatives are available, the costs of owning that car, the inconvenience of finding parking, and the cost of parking. To the extent a supply of free or low-cost on-street parking is available or the cost of parking has already been subsumed in the cost of housing, people are more likely to choose to own a car. If the supply of parking is limited, the cost of parking is great, transit is a viable option for getting around, and services are located within walking distance, consumers may choose not to own automobiles. This has been documented not only in San Francisco, but in the core of American cities across the

[38] Nelson\Nygaard, "Technical Memorandum, Vehicle Ownership in San Francisco," November ,2001.

country. See also Responses to Comments, D-10, D-14, and M-17 for further elaboration on parking studies that have been conducted.

That propensity for vehicle ownership to go down when these conditions exist, does not, however, mean that the auto ownership decisions of individuals strike a perfect balance with the parking availability within a city. In dense urban areas, the scarcity of parking may be a problem whether or not off-street parking is required in association with new development. The decision to limit parking and move toward transit as an alternative travel mode in the Project Area, is a decision that is in keeping with the City's Transit First Policy and with the current characteristics of the Market and Octavia Neighborhood, where 26 to 79 percent (varies by census tract) of rental households live car free.[39]

It is not the role of the EIR to justify policy that is recommended in the Plan; the role of the EIR is to analyze the potential impacts of the policy proposals and to respond to comments raised regarding the DEIR. Decision makers will decide the wisdom and the justification of the policies.

AA-6

See Responses to Comments Q-12 and U-24 regarding housing affordability. Page 4-69 of the DEIR also contains a discussion of housing affordability.

As noted in that discussion, the Plan is a policy document and, as such, cannot require that affordable housing be developed under the Plan beyond existing or proposed city requirements. However, one of the principal objectives of the Plan is to increase affordable housing, as stated in Objective 2.4 on page 3-21 of the DEIR. At a program level, the Plan would introduce mechanisms to encourage and support development under the Plan, but would not necessarily result in construction of specific development projects, including affordable housing. Specific projects would be subject to market factors, development proposals, and future environmental review and approval.

The proposed rezoning is intended to increase density and maximize housing opportunities along major transit routes. Without publicly-sponsored incentives and other types of market

[39] Ibid.

interventions, the proposed rezoning would not ensure that affordable housing would be built in these locations.

Property values are an underlying factor in the ability to develop affordable housing, but below-market sales prices and rents of affordable units are more of an overriding factor. Affordable housing developers face many of the same financial constraints as developers of market rate housing; high land costs, high competition for available land, increasing construction costs, and neighborhood opposition. However, affordable housing developers are constrained even further because they cannot recover high land and development costs by charging higher sales prices or rents.

The definition of affordable housing involves several factors. Affordable housing is committed to be either rented or owned at prices affordable to households with low- to moderate-incomes. The U.S. Department of Housing and Urban Development (HUD) determines income thresholds by household size for the San Francisco Primary Statistical Area (PMSA) (which includes San Francisco, Marin and San Mateo Counties.). Generally housing affordability in San Francisco is calculated as follows:

- Rental Unit: A unit for which rent equals 30% of the income of a household with an income at or below 80% of the HUD median income for the San Francisco PMSA, with utilities included in the rent payment.

- Ownership Unit: A unit for which the mortgage payments (including principal mortgage insurance, property taxes, home-owners dues and insurance equal 33% of the gross monthly income of a household earning between 80% and 120% of the San Francisco PMSA median income, assuming a 10% down payment and a 30-year 8% fixed rate loan.

Examples of how these standards would be applied to a three-person household for a rental unit and a four-person household for an ownership unit are shown in the charts below.

Table C 2004 Affordable Rental Units, Income Levels and Monthly Payments 3 Person Household			
	Average Unit Size	Maximum Annual Income	Monthly Rent
Extremely Low Income (25% of HUD Median Income)	2 Bedroom	$21,400	$535
Very Low Income (50% of HUD Median Income)	2 Bedroom	$42,750	$1,069
Lower Income (60% of HUD Median Income) [1]	2 Bedroom	$51,300	1,283
Low Income (80% of HUD Median Income)	2 Bedroom	$68,400	$1,710

[1] Meets criteria of Board of Supervisors Inclusionary Affordable Housing Program

Table D 2004 Affordable Ownership Housing, Income Levels and Monthly Payments 4 Person Household				
	Average Unit Size	Maximum Annual Income	Monthly Housing Expense	Maximum Purchase Price
Low Income (80% of HUD Median Income)	3 Bedroom	$76,000	$2,090	$275,057
Median Income (100% of HUD Median Income) [1]	3 Bedroom	$95,000	$2,613	$357,654
Moderate Income (120% of HUD Median Income)	3 Bedroom	$114,000	$3,315	$440,250

[1] Meets criteria of Board of Supervisors Inclusionary Affordable Housing Program

The Mayor's Office of Housing (MOH) implements a number of programs to increase affordable housing in the City. Except for the Residential Inclusionary Housing Program, which is required citywide, programs typically depend on income eligibility and certain location specific criteria.

- **Residential Inclusionary Housing Program (RIHP).** Established by the Board of Supervisors in 2002, this program includes rental units for lower-income households earning up to 60 percent of the HUD median income, or ownership units for first-time, median-income homebuyer households with incomes up to 100 percent of the HUD median

income. The RIHP requires developers to provide affordable housing either on-site, off-site or in-lieu fees to provide affordable housing. This requirement would be imposed in the Project Area for 10 percent of units in all projects with 10 units or more, and 12 percent of the units if a Conditional Use Authorization is required. See Response to Comment Q-12 regarding the potential number of affordable units in the Project Area under the RIHP.

- **City Second Loans for Designated Townhouse Units.** City Second Loans offer financial assistance to eligible first-time buyers with no interest and deferred loan payments that afford first-time buyers a greater opportunity to enter the San Francisco housing market. In lieu of interest, repayment of the loan includes a share appreciation in the value of the property at the time of resale. The City Second Loan Program is available only on the purchase of units located in specific developments. Within the Project Area, 101 Valencia at Valencia, Stevenson and McCoppin Streets, is an eligible property.

- **Condominium Conversion Program.** There are individual condominiums that have been previously converted from apartments available in buildings citywide. The converted condominiums are priced at below market rate, with prices approved by the MOH every time a unit is re-sold. The selling price of a unit is the total of the most recent purchase price, adjusted by the Consumer Price Index Housing Factor, plus the cost of verified capital improvements. This program allows buyers to purchase condominium units at a below market price, thereby increasing the ability of homebuyers to compete in the San Francisco housing market.

- **Extra Credit Home Purchase Program (ECHPP).** The City and County of San Francisco and the San Francisco Unified School District offer a program to assist teachers, administrators, or other eligible credentialed school personnel who work in "low performing" San Francisco Unified Schools to purchase their first home. (There are four low-performing elementary schools and two low-performing junior high schools in the Project Area.) The ECHPP provides mortgage credit certificates to eligible applicants up to 20 percent of the annual mortgage interest payment as a dollar-for-dollar tax credit against their federal tax liability. The mortgage assistance credit is used to assist the buyer in obtaining an effective reduction in monthly mortgage payments, by having more monthly take-home income available to cover mortgage payments. The City has identified certain target areas in which the ECHPP allows greater flexibility for property and homebuyers to encourage growth of home ownership and development in specific sections of the City's neighborhoods. Within the Project Area, Census Tract 161, bound by Steiner, Eddy, Gough, Fulton Streets, is a designated target area.

- **Down Payment Assistance Loan Program (DALP).** The DALP assists eligible low- and moderate-income first-time homebuyers in the purchase of their first single-family residence. Under the program, household income cannot exceed 100 percent of the San Francisco Standard Metropolitan Statistical Area (SMSA), as established by HUD, and borrowers must

contribute a minimum of five percent of the purchase price toward a down payment. The maximum loan amount is $100,000 or 30 percent of the purchase price, whichever is less. The maximum purchase price limit for a studio/one bedroom unit is $360,000; two bedrooms, $480,000; three bedrooms $550,000; and four+ bedrooms, $620,000.

- **American Dream Downpayment Initiative (ADDI).** The ADDI program provides financial assistance to low-income, first-time homebuyers by providing assistance with down payment and closing costs. This program is an enhancement to other home ownership funding sources including, the City Second, Condo Conversion and Below Market Rate Inclusionary Programs. First-time buyers must meet the HUD Low-Income limits ranging from $63,350 for a one-person household to a maximum of $97,700 for a five person household. The maximum loan amount is $10,000, deferred for 40 years or due on sale, rental or title transfers. The repayment loan includes the principal amount plus a proportional share of appreciation based on the percentage of assistance provided.

The City programs, described above, would increase opportunities for affordable housing in the Project Area. Furthermore, transit access, combined with pedestrian and streetscape amenities in the Project Area, would also enhance the attractiveness of the Market and Octavia neighborhood for housing demand at all income levels.

According to the Housing Inventory Report 2000-2004 published by the Planning Department, the San Francisco Bay Area continues as one of the nation's most expensive housing markets, with housing prices rising despite declining rental rates. In 2004, the median price for a three bedroom home in San Francisco was $730,000, and the median rent for a two-bedroom apartment was $2,068. Based on households with the most income available to spend on purchasing a home or rent, a family earning 120% of the HUD median income would fall short by almost $300,000 of being able to purchase a median-priced home. A four-person household earning 80% of the median income could pay a maximum of $1,900 or 92% of the median rent. Lower income households have even more severe difficulties in being able to afford housing. Given this gap in market sales prices and rents, affordable housing requires public intervention and subsidies such as land write-downs, tax-credits, mortgage assistance, or low-interest construction financing. Based on data provided by the 2000 to 2004 Housing Inventory, all except for one of the affordable housing developments built in the city between 2000 and 2004 were constructed by the San Francisco Housing Authority, San Francisco Redevelopment Agency or non-profit housing development corporations.

Developers cannot capture market-rate rents in affordable housing developments in order to recover high land and development costs, and achieve a reasonable profitable margin. As a result, private developers, either for-profit or non-profit, face financing gaps for affordable housing and must bundle together federal, state, city, and private capital funds, operating subsidies, and investment tax incentives to produce such housing. It is not uncommon for a developer to utilize multiple sources of funding to complete financing of an affordable housing project. Most developers currently use a combination of federal money disbursed by the Mayor's Office of Housing, Housing Block Grant Program (HOME) funds, and Low Income Housing Tax Credits.

At the program level, the City's Residential Inclusionary Affordable Housing Program requires developers to provide affordable housing either on-site or off-site or to pay in-lieu fees to provide affordable housing. In March 2002, the Board of Supervisors approved legislation to create the Residential Inclusionary Affordable Housing Program which requires 10 percent of units in all projects with 10 units or more to be made affordable, and 12 percent of the units if Conditional Use Authorization is required. On-site requirements are 10 percent of the total units developed on-site, or 12 percent if a conditional use, PUD, or live/work project approval is required. Based on the 10 and 12 percent on-site affordability requirement, about 420 affordable units in the Project Area could be built. This would represent nine percent of the total 4,440 total projected housing units in the Project Area. Depending on the number of developers that elect to contribute in-lieu fees or to construct units off-site, the number of affordable units built in the Project Area could be reduced.

In addition, the Plan contains several mechanisms at the program level to encourage development of affordable housing. These include separating the cost of parking from the cost of housing, encouraging lending institutions to expand the existing location efficient program (LEM) to highlight the Project Area as a "location-efficient" neighborhood, and encouraging innovative programs to increase housing availability and affordability.

As stated on page 4-69 of the DEIR and in Response to Comment Q-8, at the project level of analysis, the Plan includes affordability requirements for housing that would be developed on the 22 Central Freeway parcels. The San Francisco Redevelopment Agency (Redevelopment Agency) would develop half of the 800 to 900 total units as affordable housing on Parcels A, C, G, K, O, Q,

and U (45 affordable ownership units and 405 affordable rental units). As part of the agreement to transfer the Central Freeway parcels to the City, a 50 percent goal for affordable housing was established. This exceeds the Redevelopment Agency's 15 percent affordable housing requirement, as required by Community Redevelopment law. The remaining 50 percent of the units would be developed under individual ownership with at least 15 percent affordable, as required by Community Redevelopment Law.

Combined, the Central Freeway parcels and remaining Project Area have the potential to provide about 870 affordable housing units in the Project Area, or up to 20 percent of the total 4,440 units. Development of these units, however, is almost exclusively dependent on market intervention and public subsidies.

The following text is added to Chapter 4, pages 4-69 of the DEIR after the first paragraph, of the Housing Affordability discussion to clarify the City's commitment to affordable housing provision in the Project Area:

> "While the Plan cannot ensure that affordable housing would be built in the Project Area, the affordability requirements imposed on the Central Freeway parcels, and the City's Inclusionary Housing Program could provide up to about 870 affordable units, or up to 20 percent of the total 4,440 units projected for the Project Area. Development of these units, however, is almost exclusively dependent on market interventions and public subsidies given the difficulties of providing affordable housing under market-rate conditions."

Footnote 13 on page 4-69 of the DEIR is replaced with the following text to clarify the City's requirements for the provision of affordable housing.

> "[13] ~~Housing projects that require Condition Use authorization are required to meet a 12 percent affordability requirement.~~ In March 2002, the Board of Supervisors approved legislation to create the Residential Inclusionary Affordable Housing Program which requires 10 percent of units in all projects with 10 units or more to be made affordable, and 12 percent of the units if Conditional Use Authorization is required. Three pieces of legislation were introduced by members of the Board of Supervisors to increase the requirements of the Inclusionary Affordable Housing Program, Planning Code Sections 315 et seq. In summer 2006, the Board of

Supervisors adopted legislation expanding the program to require 15 percent inclusionary units for residential projects of five units or more when units are provided on-site and for 20 percent when units are constructed off-site and require that units be made available to households earning less than currently required, among other proposed changes.

AA-7

Page 3-17 of the DEIR discusses the retail policies of the *Draft Market and Octavia Neighborhood Plan.* As stated on page 3-17 of the DEIR, the Plan contains retail policies that would promote small-scale business growth to support and attract housing in the Project Area. Small business and retail uses would be located throughout the Project Area, except for the Market/Van Ness Avenue corridor. The proposed rezoning analyzed in the DEIR supports small-scale retail and businesses by limiting the floor area of retail commercial uses, particularly on the ground-floor level which is important for visibility and convenience to patrons in the residential districts of the Project Area. Proposed rezoning for Retail Commercial and Non-Retail Office uses is presented in Table 3-1 on page 3-15 of the DEIR and includes the following floor area limits to support small businesses and retail establishments.

- **Residential Transit Oriented (RTO) District**: Permitted up to 1,200 s.f. on the ground floor of corner lots only; Conditional Use above 1,200 s.f. and at other locations.
- **Neighborhood Commercial Transit (NCT) District:** Permitted up to 5,000 s. f.; Conditional Use required above 5,000 s.f.
- **Hayes Gough, Upper Market, Valencia, NCT District:** No Change from existing Neighborhood Commercial Cluster (NC-1) District which permits neighborhood retail and business services of 1,000 s.f. or more.

The DEIR discusses displacement on pages 4-71 to 4-72 of the DEIR. The first two sentences under the Displacement discussion on page 3-71 of the DEIR state:

> "No demolitions, removal, nor wholesale clearing of property are proposed with implementation of the proposed Plan. However, some displacement of existing businesses or residences could occur as specific sites are developed due to market pressures for higher density residential development with proposed new zoning or to accommodate planned transportation and public open space improvements."

The proposed rezoning would not directly displace small business owners. Most new development in the Project Area would be expected to occur on vacant in-fill sites that would not require displacement of commercial uses. Any major displacement of commercial uses would be subject to further environmental review and specific project approvals. However, as discussed in the fifth paragraph on page 3-71 of the DEIR, indirect displacement could occur due to market pressures, including increased rents.

Due to the abundance of transit access, one of the fundamental goals of the *Draft Market and Octavia Neighborhood Plan* is to create a new neighborhood which supports a lifestyle that is not dependent on the automobile. Pages 4-230 to 4-238 of the DEIR discuss increased parking demand with Plan implementation, and the resulting parking shortfall. As stated in the fourth paragraph on page 4-238 of the DEIR, parking shortfalls relative to demand are not considered significant environmental impacts in the urban context of San Francisco. At the program level, it was determined that the parking shortfall resulting from Plan implementation would not result in significant parking impacts.

While it is recognized that parking shortages could affect businesses financially, this economic impact would not necessarily result in substantial physical adverse change to the environment. The CEQA Guidelines, Section 15131 and the Public Resources Code section 21082.2 , subdivision (c) states "that evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment is not 'substantial evidence' that would show those impacts to be significant."

The DEIR analyzes several mechanisms contained in the proposed Plan to maximize walking to local business uses and minimize the need to access to small businesses and retail stores by auto. On neighborhood commercial streets, the Plan calls for ground-floor retail uses directly accessible from the street at grade; ground-floor retail uses should have a minimum of 12-foot clear ceiling heights; and not less than 60 percent fenestration on retail frontages. These elements create an attractive retail environment. The pedestrian environment would also be enhanced by traffic calming measures such as widened sidewalks, and street furniture and street trees which also make pedestrian access to businesses and shopping more attractive. In addition, the small-scale retail uses are envisioned to be targeted to residents who live within the Project Area or to visitors. Those

residents are expected to walk to most of their shopping and business destinations instead of driving. Visitors to the cultural and arts venues in the area would likely park in or near the Project Area and walk to their final destinations.

AA-8

A determination will be made at the time of the adoption of the Plan as to which mitigation measures would be implemented in conjunction with the Plan. Most of the transportation mitigation measures identified in the Plan would require the Metropolitan Transportation Authority (MTA) to take an action to either make street improvements or in one instance to reroute the 21-Hayes bus. If these mitigation measures are adopted by the City, there must be a commitment on the part of the responsible agency to implement the measures otherwise they would not be deemed viable mitigation measures.

AA-9

Although the reconstruction of the surrounding neighborhoods following the removal of the Central Freeway was an impetus for the Plan, the potential benefits of transit-oriented development were identified in the broader Project Area from the outset of the planning process. The boundary of the Project Area was established by identifying a comfortable walking distance of ¼ mile around two major Market Street transit hubs at Van Ness Avenue and Church Street and the area that had been the Central Freeway right-of-way. This boundary definition encompasses a part of the Civic Center, SoMa West, Hayes Valley, Duboce Triangle, Inner Mission, and Upper Market. Eureka Valley lies to the west of the Project Area, which extends only as far west as Noe Street. The existing development in the Duboce Triangle and along Upper Market represents an established viable transit-oriented neighborhood that could serve as an example of what type of development might occur throughout the Project Area.

The only areas within Upper Market and the Duboce Triangle that would experience changes in heights in association with the Plan are: those along Market Street, where an increase in height limits from the existing 50 feet to a proposed 65 feet is proposed between Noe and Church Streets, on a few parcels adjacent to the Market Street commercial blocks where height increases from 40 to 45 feet are proposed; and along segments of Church and Fillmore Streets where a height increase of 5 feet from 40 to 45 feet is proposed. Residential areas proposed for RTO zoning would have no

minimum parking requirements and no density limits in terms of the number of residential units (minimum unit sizes are prescribed by existing zoning regulations), although practically the height and bulk restrictions would limit the size of structures on parcels. Under the NCT districts, housing density and parking controls would be relaxed. These new designations would permit continuation of the existing land use patterns along Market Street and in the adjacent Duboce Triangle neighborhood.

AA-10

See Responses to Comments AA-2 and AA-9 regarding the public outreach effort in development of the Plan and the establishment of the Project Area boundaries.

AA-11

Comment regarding the lack of references to the Duboce Triangle, Eureka Valley, and Upper Market neighborhoods in the DEIR is noted. While the existing neighborhoods of Duboce Triangle and the Castro are not specifically mentioned in Section 3.3, they are described in other sections of the DEIR, specifically on pages 4-30 to 4-31 and 4-88 to 4-89. The overall intent of the Plan is summarized graphically on page 15 of the Plan. As noted on this Plan Framework figure, the intent is to "support residential infill within the fine-grained pattern of existing residential districts," which would be applicable in the Duboce Triangle, Inner Mission, and Castro Districts. Also in the western portion of the Project Area, the intent is to strengthen Market Street as the city's most important pedestrian and transit street and to improve the Church and Market Streets intersection as a major transit hub.`

The following text is added to Chapter 3, page 3-8, of the DEIR following the third paragraph to elaborate on the characteristics of the broader Project Area:

> "The Upper Market District, which extends from Van Ness Avenue west, is characterized by neighborhood commercial restaurants, bars, cafes, fitness studios, and a variety of retail establishments. The Castro District centered at Market and Castro Streets, is located on the western edge of the Project Area. Upper Market Street, near Castro Street, is characterized by three- to four-story commercial buildings with ground-floor retail uses including restaurants, shops, and fitness

centers. Multi-story residential apartments and flats surround the commercial developments on Market, Church, and Castro Streets. West of Castro Street, the commercial uses mix with Victorian buildings along Market Street.

Duboce Triangle, in the western Project Area, north of Market Street, is bounded roughly by Waller Street to the north, Castro Street to the west, and Market Street to the south and east. This district is predominantly residential with interspersed neighborhood commercial uses and unique landscaping and traffic-calming measures."

Section 3.4 of the DEIR describes the general recommendations of the Plan, which includes not only the Hayes Valley area, but also SoMa West, Upper Market, and Inner Mission. References to policies pertaining to the western portions of the Project Area are provided on page 3-16, paragraph three; page 3-17, paragraphs one and three; and page 3-33, paragraph two of the DEIR. To further elaborate on the policies pertinent to the western Project Area, text changes are noted below.

The text in Chapter 3, page 3-16, of the DEIR third paragraph, fourth sentence, is amended to read as follows:

"Except for the areas around Market Street and Van Ness Avenue, where heights would increase to a maximum of 400 feet (an increase of 80 feet on some parcels), and Upper Market Street, where heights would increase by 15 feet to 65 feet, most of the heights in the rest of the Project Area would remain the same, decrease, or increase by about five feet."`

The text in Chapter 3, page 3-17, of the DEIR first paragraph, second sentence is amended to read as follows:

"This potential would generally be smaller in existing residential districts, such as Duboce Triangle, the Castro, and Inner Mission, and more concentrated at the Van Ness Avenue/Market Street/Mission Street intersection, in the SoMa West area and extending out along major commercial streets such as Market and Mission Streets."

AA-12

See Responses to Comments AA-2 and AA-9 regarding the public outreach effort in development of the Plan and the establishment of the Project Area boundaries.

AA-13

The Plan advocates transit-oriented development in the Project Area to take advantage of an existing well-established transit network that services the area. The Plan also recommends uncoupling the cost of parking from the cost of housing and reducing the required parking as a means of making housing more affordable. These two policies promote alternatives to the auto to increase the options for travel available to residents and visitors to the Project Area. The reconstruction of the Central Freeway, south of Market Street, the provision of a new touchdown ramp at Market Street, and the construction of a major new surface street along Octavia Boulevard are all major projects in the Project Area that are intended to accommodate auto travel. The intent of the Plan is to achieve a better balance between the various travel modes, rather than primarily relying on auto travel.

AA-14

The Residential Guidelines outlined on page 4-23 of the DEIR are applicable to new residential development and served as the foundation for the development of residential design guidelines for the Project Area. The adoption of the Plan would supercede the citywide Residential Design Guidelines in the Project Area. The intent of the Plan is to maximize opportunities for infill housing and construction of buildings out to the public right-of-way is encouraged, in conjunction with the creation of buildings of human scale. On Market Street, the objective is to establish a height district that reflects the monumental character of the street, while stepping down approaching the Castro District to transition to the surrounding areas. There are no bulk controls recommended for buildings under 85 feet in height; only on taller buildings are setbacks encouraged.

Currently, most of the residential neighborhoods to the north of Market Street and west of Laguna Street in the Project Area have height limits of 40 feet. The residential height limit would remain as is today, except for a few intersections where a 45-foot height limit is proposed to accommodate localized retail establishments. Upper Market Street, from Laguna Street to just west of Church Street, currently has a height limit of 80 feet that would be increased to 85 feet in height and from just west of Church Street to Noe Street, Market Street currently has a height limit of 50 feet that

would be increased to 65 feet under the proposed Plan. Should these changes be implemented, the potential for shading of residential properties would be increased adjacent to Market Street, but this would not create a significant shadow impact per the shadow significance criteria, which focus on impacts associated with open space and park areas. As noted on page 4-121 of the DEIR, no significant shading impacts are expected to occur on Duboce Park in the Duboce Triangle area.

AA-15

See Response to Comment H-2 for a discussion of the potential impacts on historic resources in the Project Area.

As noted on page 4-169, last paragraph, of the DEIR, the Plan calls for the preservation of landmarks and other buildings of historic value as an invaluable asset to the neighborhood (Policy 1.1.9, on page 28 of the Plan). The potential impact on structures of historical significance is discussed and found to be not significant at a program level given the existing controls protecting historic resources in combination with the policies of the Plan calling for the protection and preservation of historical structures.

AA-16

The commentor is correct that San Francisco has experienced a decline in population in the past several years. The U.S. Census update between April 2003 and March 2004 reported a loss of about 7,770 residents, dropping to a total population of 744,230. This is a continuation of a downward cycle that began in 2000, after there was slow recovery from the dot.com bust. Economic growth is closely linked to population growth, which also slowed during this period throughout the Bay Area. Other factors affecting population loss over the past several years is the City's lack of affordable and family oriented housing.[40] Long-term forecasts are that the population will peak to about 810,000 in 2010 and readjust as the demographics of the City change and the birthrates goes down (ABAG Projections 2005).

The population projections for the *Draft Market and Octavia Neighborhood Plan* are based on the Planning Department's citywide *Land Use Growth Allocation (LUA) 2002.* The *LUA 2002* is a refinement of *ABAG Projections 2002* which was based on the U.S. Census, 2000. Between 2000

[40] (Hans Johnson, Demographer, Public Policy Institute of San Francisco)

and 2004, the *LUA 2002* allocated an increase of 240 residents, from 26,410 in 2000 to 26,650 in 2004. This increase is less than one percent population growth in the Project Area under existing conditions. This allocation of growth does not necessarily imply that population growth increased citywide, but that as development in the City occurs, even with a population decline, residents in other areas of the City would choose to move into the Market and Octavia neighborhood. The existing transit network, the expected neighborhood revitalization with removal of the Central Freeway and the expected completion of the Octavia Boulevard improvements could all be factors attracting existing San Francisco residents to relocate to the Market and Octavia neighborhood.

The text in Chapter 4, page 4-64 of the DEIR, last sentence in the second full paragraph, is revised as follows to clarify the projected growth rate for the Project Area:

> "The total household population and households as reported by the 2000 Census is slightly lower than that of the Planning Department's *LUA 2002* projections for the year 2004~~, which would be consistent with growth that is likely to have taken place between 2000 and 2004~~. The *LUA 2002* indicates there would be about a one percent growth in population in the Project Area between 2000 and 2004."

Employed residents for the 2025 with Plan conditions are discussed beginning with the second paragraph on page 4-71 of the DEIR. This analysis is not intended to analyze commute patterns of the Project Area residents outside of San Francisco. As stated on page 4-71 of the DEIR, it is not possible to predict if new jobs in the Project Area would be held by area residents. The roughly 70 percent of employed residents in the Project Area would either work in the area, at other San Francisco employment centers, or work outside of San Francisco.

Determining the number of residents in the Project Area who commute outside of San Francisco is not the basis for determining the adequacy of off-street and on-street parking requirements. The off-street and on-street parking requirements are intended to reduce dependence and ownership of private automobiles in the Project Area. Residents who commute may own an automobile, and choose to either drive or take transit to get to work. A more reasonable determination of the adequacy of off-street and on-street parking requirements is auto ownership. The parking demand analysis discussed on pages 4-209 to 4-210 of the DEIR is based on auto ownership within the Project Area, taking into consideration the limited number of parking spaces available with

implementation of the Plan's parking reduction requirements, and the Project Area's accessibility to transit and other alternative modes. Based on the off-street and on-street parking requirements proposed by the Plan, Table 4-25 and Table 4-26, respectively, indicate there would be a parking shortfall of 1,350 spaces during weekday midday conditions, and a shortfall of 2,480 spaces during weekday evening conditions. As stated in the fifth paragraph on page 4-238 of the DEIR, parking shortfalls relative to demand are not considered significant environmental impacts in the urban context of San Francisco.

AA-17

The Plan would create social change in the Project Area with the addition of population. CEQA requires that physical impacts related to social change must be disclosed in an environmental document. As noted by the commentor, on page 4-66 of the DEIR, paragraph one, the secondary physical effects of the population changes are addressed in other sections of the DEIR as direct impacts. The DEIR, in the Chapter 1.0 Summary, and also in Sections 4.5, Shadow and Wind, and 4.7 Transportation, notes that there are potentially significant shadow and transportation impacts associated with the growth in population in the Project Area. No significant noise, air quality, or public services impacts were identified as a result of the implementation of the Plan.

AA-18

The intent of the program level analysis in this DEIR is to assess the environmental impacts within the identified Project Area, should the proposed Plan be implemented in the future. As the Plan is not a citywide land use plan, the purpose of the DEIR is not to evaluate which area of San Francisco is most appropriate for infill housing, but rather to focus on the impacts associated with the implementation of this specific Plan in the Project Area.

AA-19

As the commentor states, implementation of the proposed Plan would result in a 26 percent increase in residential population within the Project Area by 2025. However, as shown in the first row of Table 4-2 on page 4-67 of the DEIR, the proposed population increase would account for 11.7 percent of Citywide population growth in the year 2025, which would not be considered a substantial increase in the context of the City as a whole.

The commentor is correct that portions of the Upper Market neighborhood in the Project Area are substantially built out. New development in Upper Market is expected to occur on infill sites or on already developed sites that could be built out more efficiently in the future to accommodate new residential growth, such as the UC Extension site or the Safeway site at Market and Church Streets, should a major redevelopment of that site be proposed by the owner.

Population growth, although slowed in the past several years, would continue to occur in San Francisco over time, regardless of whether the proposed Market and Octavia Plan were to be implemented (see also Response to Comment AA-16, which discusses population growth in the City). The proposed Plan seeks to locate growth, at whatever level, in an area of the City that has an existing abundance of transit resources, an urban grid that supports pedestrian movement, and can accommodate new residential growth that would be supported by neighborhood retail and business services.

AA-20

See Response to Comment M-17 regarding the cost of housing as it relates to the provision of on-site parking.

AA-21

The comment is incorrect. See Response to Comment AA-7 regarding the retail policies of the Plan and the potential for displacement of small businesses.

The displacement of residences and businesses is discussed in the DEIR on page 4-71, last paragraph of the page and continuing on to the following page. Specifically the DEIR states, "...some displacement of existing businesses and residences could occur as specific sites are developed due to market pressures for higher density residential development with proposed new zoning or to accommodate planned transportation and public open space improvements." It also states that most new development would be expected on vacant in-fill sites that would not require displacement of existing businesses or residences.

AA-22

The wire-frame format allows the reader to understand exactly which portions of the existing view

could be lost due to the construction of buildings in conformance with the Plan. However, revised versions of Figures 4-14, 4-15 and 4-16, as presented on the following pages, that incorporate the background-fill suggested by the commenter are presented for consideration. While these revised figures provide a different perspective on the view impacts, they are likely to overstate the visual impacts of the Plan implementation as the exact configuration and design of future buildings are not known at this time.

Figure 4-14 on page 4-101 of the DEIR, Figure 4-15 on page 4-103 of the DEIR, and Figure 4-16 on page 4-109 of the DEIR are revised as shown on the following pages to include background fill.

AA-23

The reference to light and glare is intended to include street lights, but is not clear.

The text in Chapter 4, page 4-96, of the DEIR third paragraph, first sentence, is amended to read as follows:

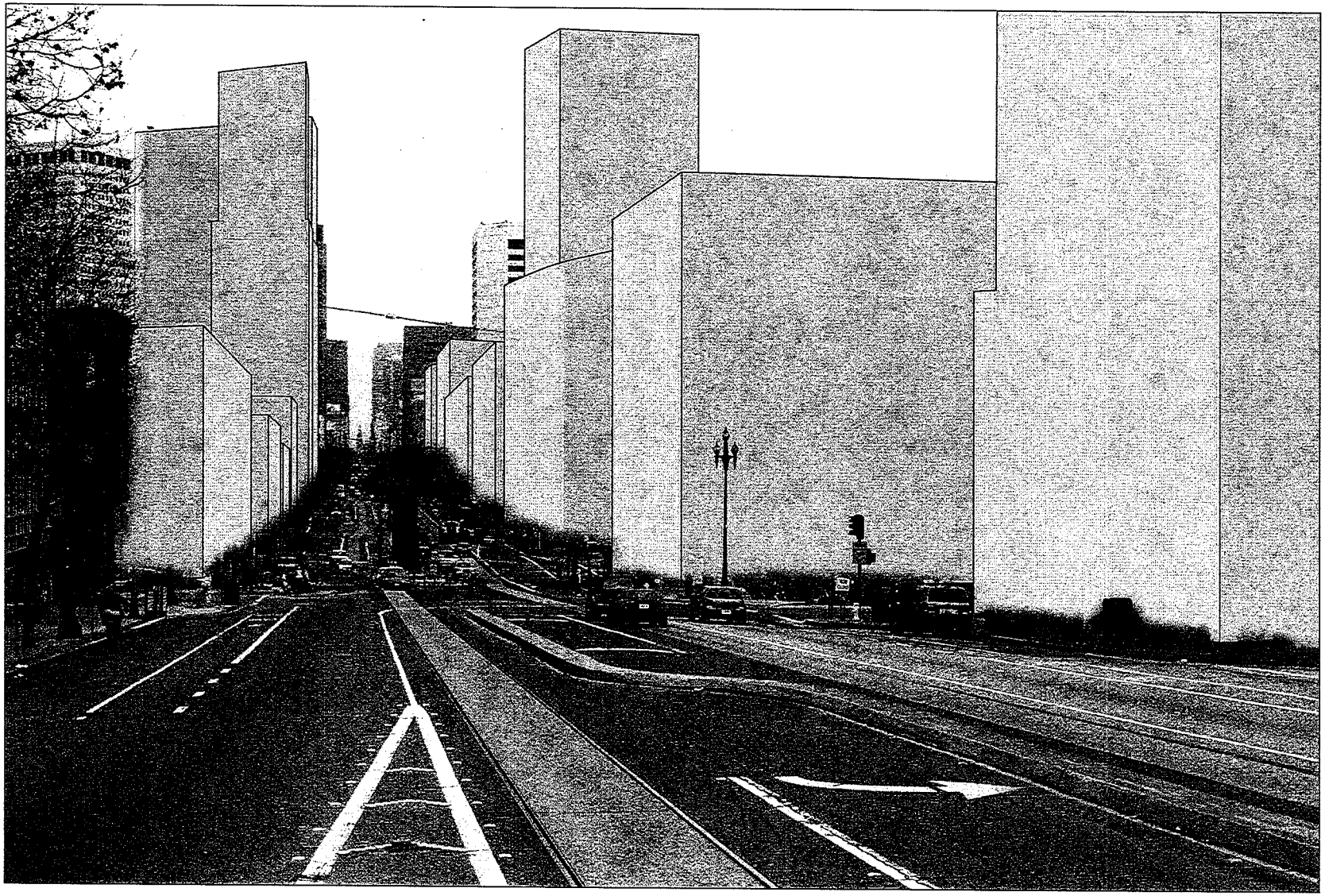
> "Sources of light and glare around Project Area neighborhoods are generally limited to the interior and exterior lights of buildings and lighting visible through windows, lights in parking lots, and city street lights."

AA-24

Comment regarding visuals impact assessment is noted. Text changes as noted below are suggested to clarify the modifications in height recommended under the Plan. In addition, an error in reporting of the heights along Franklin Street is corrected in this modified paragraph.

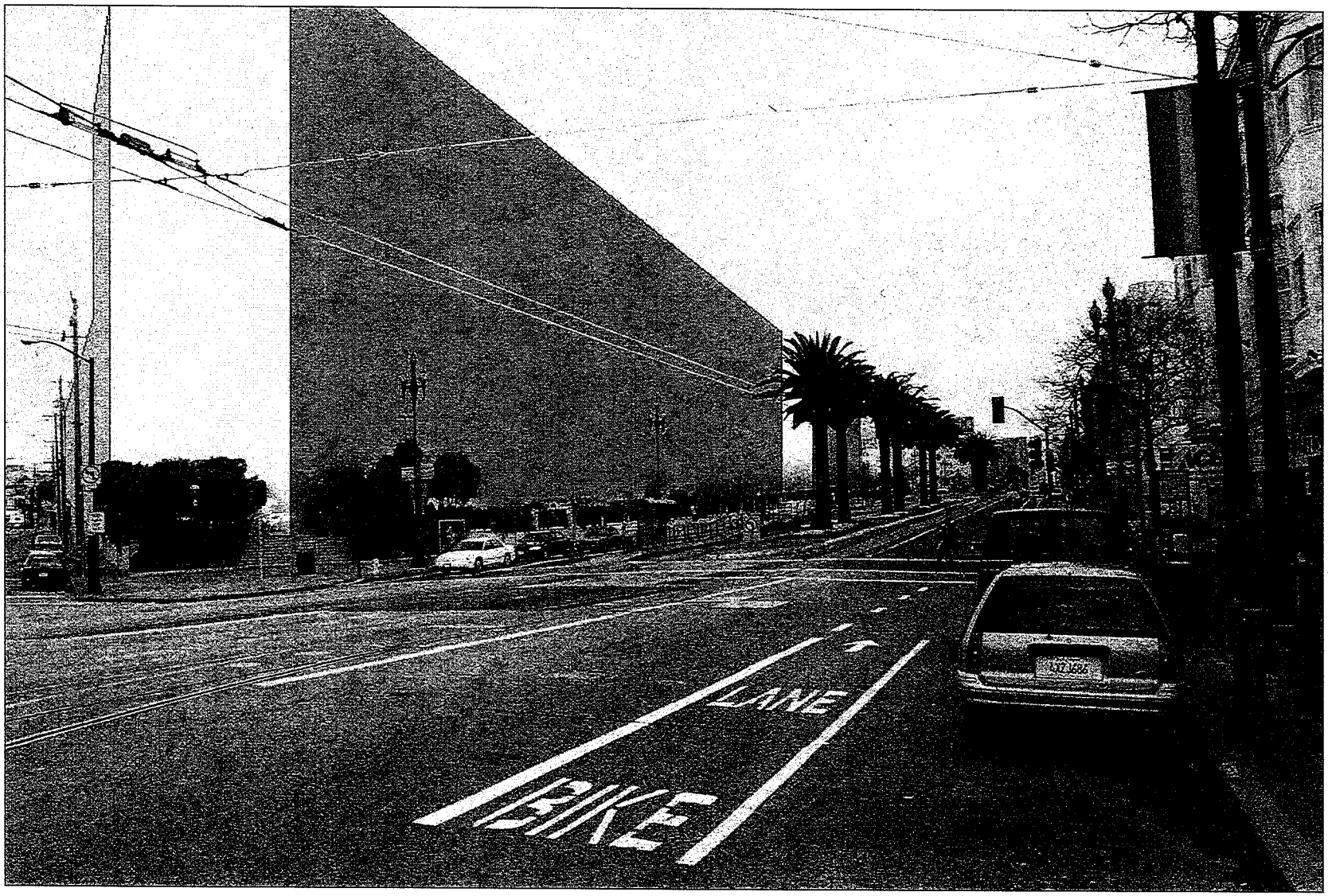
The text in Chapter 4, page 4-97, of the DEIR starting with the last sentence of the last paragraph and continuing on to page 4-98, is revised to read as follows:

> "Building heights within Hayes Valley, Duboce Triangle and the Inner Mission areas would range from 30 to ~~50~~ 55 feet (compared to existing height limits of 40 to 105 feet); heights on the frontages of Franklin and Market Streets would be slightly taller. Along Market Street, the Plan's proposed building heights of 85 feet (compared to the existing 60-, 80-, and 105-height limits) could create a uniform ~~85-foot~~ street wall that would extend from Franklin Street to Church Street. Beyond Church Street,



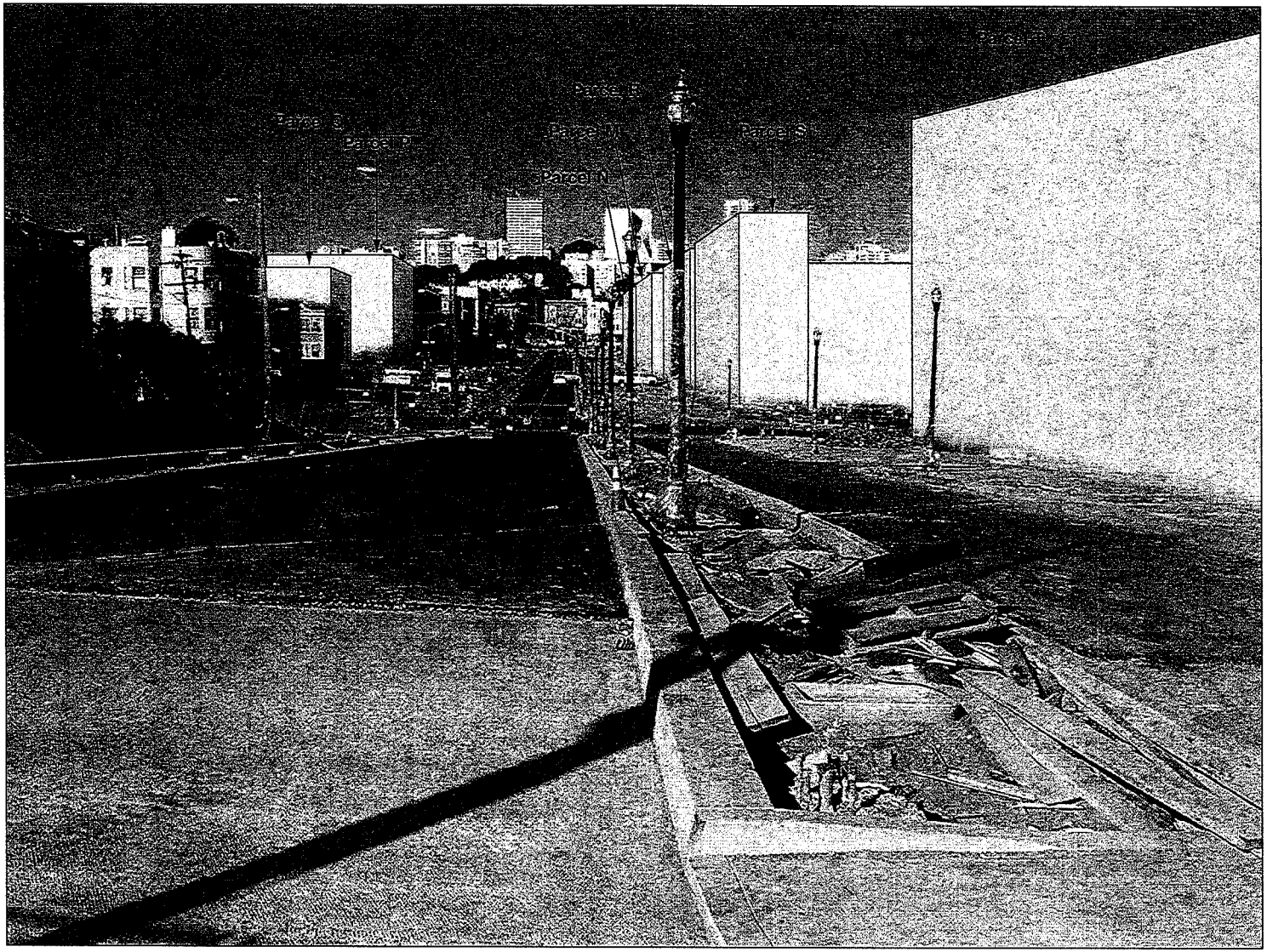
SOURCE: Environmental Science Associates

Figure 4-14
Revised
Viewpoint S1: Market Street, Looking East



SOURCE: Environmental Science Associates

Figure 4-15
Revised
Viewpoint S2: Market Street, Looking Southeast



SOURCE: Environmental Science Associates

Figure 4-16
Revised
Viewpoint S3: Octavia Boulevard, Looking North

building heights would step down to 65 feet (compared to the existing height limit of 50 feet). On Franklin Street, heights would be ~~65~~ 85 feet (compared to the existing height limit of 80 feet) between Market Street and ~~north to~~ Fell Street. ~~and generally 50 to 65 feet f~~From Fell Street to McAllister Street, the western edge of Franklin Street would have 50- to 65-foot height limits (same as the existing height ranges) and the eastern edge of Franklin Street would have 80- and 160-foot height limits (compared to existing 130- and 160-foot height limits). North of McAllister Street, heights would increase to ~~85~~ 65 to 120 feet on the western frontage of Franklin Street (compared to the existing 65-foot height limit). "

The analysis of the visual impacts of the Plan is properly based on a comparison of the proposed Plan with existing visual conditions, namely what exists now in the project area rather than how the area would appear if it were to be built out to the existing height limits.

The DEIR analyzes the Plan's building height limits against the existing building height limits. In Section 4.3, Land Use, Figure 4-3, page 4-40 shows the exiting height limits and Figure 4-4, revised as shown in Response to Comment O-1 shows the proposed height limits. The accompanying text in Section 4-3 describes the existing limits and the resulting impacts related to the changes in those limits.

AA-25

The commentor asserts that the massing and shading will have an impact on the visual character of a Victorian neighborhood. The basis for this assertion may be that in the commentor's opinion, the size, bulk, and design of future buildings would not be compatible with the existing Victorian structures. The analysis in Section 4.4 of the DEIR describes in substantial detail the existing conditions and the considerations used to reach the conclusion that the visual impacts would not be significant. The bases for this judgment are laid out in Section 4.4. The DEIR authors have reached the conclusion that the visual effects of the Plan would not result in a significant environmental impact. There is nothing inherent in the Plan that would result in an inevitable visual impact. The DEIR concludes on page 4-99:

"While the proposed Plan would result in visual changes within the Project Area, these

aesthetic changes are intended to improve the overall visual quality. Future uses and building designs would be developed pursuant to the City's *General Plan* and urban design controls and guidelines imposed by the Civic Center Plan (applicable to the Civic Center area only), and by the proposed *Market and Octavia Neighborhood Plan* as discussed in this document in Chapter 3, Project Description, and Chapter 4.2, Land Use and Zoning. These measures would minimize the adverse visual impacts in the Project Area."

AA-26

The commentor asserts that the increased zoning height along Market Street and rezoning of residential neighborhoods will have a substantial, demonstrable negative aesthetic effect on visual character and quality of the Upper Market neighborhoods. The visual impact assessment performed for the DEIR (see pages 4-96 to 4-111) concludes that there would be no significant visual impacts associated with the implementation of the Plan.

See Response to Comment AA-25 regarding the potential visual impacts of the Plan and assumptions used in assessing those impacts.

AA-27

See Response to Comment AA-22 regarding the wire-frame format for the visual simulations and the revised figures showing the viewpoints.

The wire-frame format allows the reader to understand exactly which portions of the existing view could be lost due to the construction of buildings in conformance with the Plan. However, a revised version of Figure 4-15 that incorporates the background fill suggested by the commenter is presented.

AA-28

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project Area.

AA-29

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project

Area.

AA-30

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project Area.

AA-31

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project Area.

AA-32

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project Area. Also, historic resources in the Mission Dolores area are included in the Inner Mission North, Cultural Resources Survey prepared by the City and County of San Francisco Planning Department (referenced on page 4-160 of the DEIR). Mission Dolores is identified as a San Francisco Landmark (Table 4-9), listed in the National Register of Historic Places (Table 4-11), and listed as a California Historical Landmark (Table 4-12)

AA-33

See Response to Comment H-1 regarding the adequacy of historic surveys conducted in the Project Area.

AA-34

The commentor's references to the Market Street height limits express concern about the direct effects of the *Market and Octavia Neighborhood Plan* on the Project Area, rather than its cumulative impacts. The increase in heights along Market would increase the lengths of shadows cast primarily on properties on the north side of Market Street, but also on properties on the south side of Market Street that would be shaded in the summer afternoons. However, these localized effects do not represent a significant impact. The view corridor, visual and aesthetic effects, as well as the shadow and wind effects, of increasing the height zones within the *Market and Octavia Neighborhood Plan* area are described in substantial detail within Section 4.4 of the DEIR.

The cumulative impacts of the Plan could result only from the combination of the *Market and Octavia Neighborhood Plan* occurring in conjunction with other development from plans or individual projects. As noted on p. 4-111, the overlap with the *Mid-Market Redevelopment Plan* area would occur at the eastern edge of the Project Area, along a portion of Market Street. Because the Plan recognizes the scale of future buildings along the eastern edge of the Project Area, and accommodates it by a gradual stepping up in building heights toward Market Street, and because no significant impacts to visual quality or views were identified, no cumulative impacts of the Plan would occur. Cumulative impacts resulting from other development that would occur independent of the Plan would have to be outside of the Project Area, otherwise it would be in accord with the Plan and result in the effects previously described. For other development outside of the Project Area, possibly in the Mid-Market area or farther south of Market Street, little interaction with the *Market and Octavia Neighborhood Plan* Project Area would occur. There would be no demonstrable negative aesthetic effect on the existing visual character or quality of the area and its surroundings or obstruction of publicly accessible scenic views. The generation of light, glare or shadow would not adversely affect other properties. Therefore, the cumulative urban design and visual quality impacts would be less than significant.

As noted on page 4-136 of the DEIR, "The Plan, in conjunction with the *Mid-Market Redevelopment Plan*, may lead to cumulative wind effects near Tenth and Market Streets." However, the distance at which adverse wind effects could cumulate is relatively small for the 85-foot building heights noted by the commentor. As a result, any potential cumulative wind effect related to the *Mid-Market Redevelopment Plan*, would occur near that Plan's boundary. Localized wind effects near Market Street, within the Project Area, would not be significant.

Finally, because new development would be subject to Mitigation Measures 5.5.B1 and 5.5B2, page 5-3 of the DEIR, cumulative wind impacts would be expected to be less than significant.

AA-35

Traffic impact analyses in San Francisco typically evaluate PM peak period conditions only, when there are a higher number of vehicles on San Francisco roadways and the transportation network are most constrained. Within the study area, observations during the AM peak hour found some segments operating under constrained conditions (e.g. eastbound on Fell Street at Franklin Street

and northbound on Octavia Boulevard). However, in general, traffic conditions in the study area as a whole operated with less vehicle queuing and minimal delays. Therefore, less constrained conditions (e.g. AM, midday and weekends) with the Plan would not identify any effects that are not already considered with the higher volume PM peak-hour analysis in the DEIR.

AA-36

See Response to Comment X-8 regarding the transit analysis in the DEIR.

AA-37

The significance criteria used by the Planning Department states that the absence of a ready supply of parking spaces combined with available alternatives to auto travel and a relatively dense pattern of urban development induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Based on the high availability of alternative modes such as transit service, taxis, bicycles or travel by foot, current residents in the area have a high percentage of non-auto use (around 45 auto and 55 percent non-auto) and a lower auto-ownership rate than the rest of San Francisco (0.60 vehicles per household compared to 1.11 per household) (see pages 4-208 and 2-10 of the DEIR). See also Responses to Comments M-2, M-4, M-9, and AA-5 for a more detailed discussion of the methodology use to estimate parking demand and the parking significance criteria.

AA-38

Existing parking deficits are difficult to quantify as they are based on unmet parking demand within the Project Area or nearby parking facilities. When parking demand is not satisfied, drivers will either park elsewhere or change their travel behavior. Given the limitation of ready available parking in the Project Area, drivers have already shifted to other modes of travel or changed their travel habits (see Response to Comment AA-37). This travel behavior is observed through the existing constraints of the Project Area. Drivers who are seeking parking near their residence would attempt to find parking at or near their home and then seek parking farther away if convenient parking is available (see Response to Comment D-10). The significance criteria stated in the *SF Guidelines*, identify parking deficits as social effects, rather than impacts on the physical environment as defined by CEQA (see Responses to Comments S-3 and U-4).

AA-39

See Response to Comment A-27. The Plan's project description accounts for future residential development based on changes in zoning and does not specifically call for changes in zoning related to other uses. Although other uses may be developed in the future within the Project Area, they would not be due to the implementation of the Plan. Therefore, the estimation of the Plan's parking demand is based on the number of new residential units that would directly result from the Plan.

AA-40

The reduced parking demand presented on page 4-210 of the DEIR is estimated as a comparison to the parking demand based on the *SF Guidelines* (see Response to Comments M-4, M-5, and R- 16). The analysis prepared for the reduced parking demand is presented to provide a theoretical future parking demand if the current lower vehicle ownership rates were to continue in the Project Area.

U.S. Census journey-to-work information is the standard approved methodology of *SF Guidelines* to determine the distribution of all residential trips based on the geographic destinations indicated in the relevant census tract data. According to the U.S. Census Bureau, Census household information includes "all the people who occupy a housing unit as their usual place of residence and a person, or one of the people, in whose name the home is owned, being bought, or rented."[41] As such, information presented on page 4-210 of the DEIR is inclusive of the current auto ownership characteristics of both renters and home owners. A separate demand scenario was developed based on the standard methodology used by the Planning Department (see Response to Comment U-6). Decision-makers are presented with information on different parking demand and supply scenarios to assist them in making policy decisions.

AA-41

The DEIR determines traffic operations for existing, future 2025 without Plan, and future 2025 with Plan conditions. The future 2025 conditions do account for the background growth in traffic volumes through the City and the Project Area, and are based on the SFCTA's travel demand forecasting model (as stated on page 2-206).

[41] http://www.census.gov/index.html

Table 4-20 on page 4-221 of the DEIR presents the Plan's contribution to future 2025 with Plan conditions for those intersections that would operate at LOS E or F during the weekday PM peak hour. Traffic volumes generated by the Plan are distributed to the study intersection and presented under the 2025 with Plan conditions – these are the 1700 vehicles as quoted by the commentor. As such, Table 4-20 presents the Plan's contribution to the total and growth for 2025 with Plan conditions. Appendix C, page 9.C-9 Table C-9 presents the intersection level of service for Existing, 2025 without Plan and 2025 with Plan scenarios.

AA-42

See Response to Comment X-8 regarding the transit screenline analysis.

AA-43

The existing parking utilization in the Project Area is around 94 percent mid-morning, 82 percent at the start of the PM peak, and 38 percent at 6 PM (see Response to Comment A-26). Although there is some off-street parking availability in the Project Area, Tables 4-27, 4-28, 4-29 and 4-30 on pages 4-235 to 4-237 of the DEIR present the parking demand and supply only associated with Plan. Under the "no minimum space" development condition, the Plan's parking supply would not accommodate any of the residential parking demand resulting in a shortfall of spaces during the weekday midday and the weekday evening. Although parking conditions in the Project Area with the Plan are assumed to operate at over 100 percent occupied, based on the significance criteria stated in the *SF Guidelines*, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA (see Responses to Comments U-3 and U-4). Therefore, parking shortfalls relative to demand are not considered significant environmental impacts in the urban context of San Francisco. The secondary parking impacts of limiting the parking supply have been fully analyzed and are discussed in Response to Comment S-3.

AA-44

Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines Section 15131 (a).) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, such as increased traffic congestion at intersections, air quality impacts, safety

impacts, or noise impacts caused by congestion (see Response to Comment U-4). The secondary parking impacts of limiting the parking supply have been fully analyzed and are discussed in Response to Comment S-3.

AA-45

See Response to Comment AA-40 regarding the methodology used to estimate parking demand.

AA-46

Promoting programs such City CarShare are improvement measures identified to reduce the parking demand associated with the Plan. The DEIR does not make assumptions about the existence of the City CarShare program as part of the 2025 future parking analysis. Note that models which forecast 2025 future conditions are based on long-term trends of traffic and parking. Although parking and traffic conditions may have short-term variations occurring within individual years, long-term estimates are based on future growth and estimated parking demands.

AA-47

See Response to Comment S-6 regarding air quality impacts.

AA-48

See Response to Comment S-3 for a discussion of noise impacts.

As noted on page 4-270 of the DEIR, the predominant sources of noise in the Project Area are those related to traffic and demolition, excavation, and new construction. The potential for secondary noise impacts resulting from new development are identified as including heating, ventilation, and air-conditioning equipment and local noise generating activities. Though not specifically identified, the local noise-generating activities might include, additional horn-honking, car alarms, and extended garbage pick-up activity in the neighborhood. These secondary sources of noise are intermittent and in the context of the dense urban environment in the Project Area, would not have a significant impact on the existing relatively high ambient noise levels.

AA-49

The new parks and open space areas recommended in the Plan would be located in those areas that

currently have lower availability of usable open space, would be expected to experience the greatest impacts associated with the introduction of infill housing, and/or where the greatest opportunities were created through the reconstruction of transportation facilities. This is along Octavia Boulevard in Hayes Valley, in SoMa West, and along Market Street where the freeway is being reconstructed. No significant impacts to open space were identified in the Duboce Triangle area, which would not experience a substantial change in land use patterns as a result of the proposed Plan implementation therefore no mitigation measures would be required.

AA-50

The discussion on page 4-337 of the DEIR relates to the cumulative growth impacts of the Plan. The impacts of the population growth to the Project Area are discussed on pages 4-66 and 4-67 of the DEIR, where it is noted that the population in the Project Area would increase by 26 percent between 2004 and 2025 above what would occur without the Plan implementation. The DEIR states that the growth in population resulting from the implementation of the Plan would result in potentially significant transportation and shadow impacts, which are discussed in detail in Section 4.5 Shadow and Wind and Section 4.7 Transportation.

AA-51

Page 4-338 of the DEIR relating to cumulative growth impacts associated with the Plan indicates that new job growth in the Project Area, which is minimal, could be accommodated by the projected new housing units. The new housing units in the Project Area would be occupied by a combination of workers from within San Francisco and those that would opt to move into the City as a result of the expanded housing opportunities. The DEIR does not state that there would be no new job growth in San Francisco; rather it states that there would be very minimal job growth in the Project Area that is directly attributable to the implementation of the Plan. Job growth would in fact continue to occur in the Project Area and within San Francisco. To the extent that a better balance between job and housing can be achieved in San Francisco and in-commuting reduced by implementing the Plan, improvements to regional air quality and traffic would be expected.

AA-52

A sample Environmental Checklist, which includes possible significance criteria, is included in Appendix G of the state CEQA Guidelines. While the San Francisco Planning Department does

not follow the format of the state checklist exactly, the significance criteria used by the City are generally at the same level of detail as those identified in the checklist. For some environmental impacts, for example, transportation and air quality, numerical thresholds have been used; however many environmental impacts, such as those related to Land Use and Zoning and Population, Housing, and Employment do not lend themselves to precise measurements. The significance criteria as identified in the DEIR are an adequate tool for determining whether or not a significant impact would occur.

The significance criteria used in making a determination of environmental impacts for Land Use and Zoning are described on page 4-42 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would disrupt or divide the neighborhoods or if they would substantially change the established land use pattern in the Project Area. It was determined that the Plan implementation would not result in significant land use or zoning impacts.

AA-53

The use of significance thresholds for determining impacts for Population and Housing is appropriate for the same reasons that are discussed in Response to Comment AA-52.

The significance criteria used in making a determination of environmental impacts for Population, Housing, and Employment are described on page 4-65 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would result in substantial growth or population concentration, result in displacement of large numbers of people or workers, create a substantial demand for new housing, or reduce the housing supply in the Project Area. It was determined that the Plan implementation would not result in significant population, housing, or employment impacts.

AA-54

The analysis for the DEIR for the Plan is generally conducted at a program level as there are only a limited number of specific plans for individual projects at this time. As noted on page 4-105 of the DEIR, while the implementation of the Plan and individual projects within the Project Area would result in changes to views and changes to the aesthetic character of the Project Area, these changes collectively are not found to have a significant negative impact on the environment. Development

would be bound by urban design guidelines outlined in the *General Plan*, the Civic Center Plan (for those four blocks located within the Civic Center Plan Area), and the proposed Plan that are aimed at protecting the integrity of existing development patterns, view corridors, and historic structures. Future individual development projects, not evaluated at a project level in this EIR, would be subject to their own independent environmental review, at the time that the specific building height, bulk, and design treatment have been proposed and the specific impacts can be determined.

AA-55

See Responses to Comments H-1, H-2, and AA-22 regarding the protection of historic resources and revisions to the wire frame photos showing visual impacts.

The wire frame photos provided in Figures 4-14 through 4-16 are intended to provide a general idea of how the most significant changes in height and bulk districts proposed in the Plan would potentially affect the urban design and visual quality. The Plan includes policies that specifically call for the preservation and protection of historic resources (see page 28 of the Plan and complement already established guidelines and restrictions that govern the protection of historic resources. As a result of these protections, it is not expected that there would be significant impacts on historic structures in the future as a result of the Plan implementation. The impacts on individual historic resources would need to be evaluated as part of an independent environmental review at the time that specific development proposals are advanced. As the specific location of future development and the specific design of buildings is not known at this time, a series of photo montages projecting the future skyline of the city at five year increments would be very speculative and would not provide additional relevant information to decision-makers at this time.

AA-56

See Response to Comment AA-52 regarding the validity of the significance criteria used in the DEIR.

The significance criteria used in making a determination of environmental impacts for Shadow and Wind are described on pages 4-119 and 4-133 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would result in new shadow on parks or open space under the jurisdiction of Parks and Recreation Department or would result in exceedances of the

wind hazard criteria of 26 mph for a single hour of the year in the Project Area. It was determined that the Plan implementation could result in shading of the War Memorial Open Space and UN Plaza as a result of the increased heights and therefore could result in a potentially significant and unavoidable impact. Neither of these plazas are located within the Upper Market neighborhood. It was determined that the implementation of the Plan could result in potentially significant wind impacts, particularly in the vicinity of the Market Street and Van Ness Avenue intersection. The implementation of recommended mitigation measures would reduce these impacts to a less than significant level.

AA-57

See Responses to Comments H-1, H-2, and AA-55 regarding the potential impact on historic resources.

The potential impacts on historic resources related to the implementation of the Plan are stated beginning on page 4-169 of the DEIR. The proposed Plan policies pertaining to preservation of historic landmarks and other buildings of historic value in combination with existing *General Plan* policies and *Planning Code* regulations are expected to result in the preservation of historic buildings in the Project Area as an integral part of the neighborhoods' character. As noted in the DEIR, individual development proposals within the Project Area would be subject to independent review to ensure compatibility with adjacent historic resources, to protect against demolition of valuable historic structures, and to ensure re-use proposals are consistent with the Secretary of the Interior's "Standards for Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" or "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." In addition, specific proposals for major alteration or demolition of historic structures are subject to review by the Landmarks Advisory Board. With adherence to the required procedures, standards, and regulations, already in place and supported by the policies of the proposed Plan, no significant impacts on historic resources would be expected.

AA-58

Comment regarding the presence of historic resources in Duboce Triangle is noted. See Responses to Comments H-1 regarding historic resource documentation and AA-57 regarding significance of impacts. Generally the heights in the Duboce Triangle Neighborhood would remain as they are

today, with the exception of five-foot height increases that would be permitted along segments of Duboce Avenue and Church Street and at the Fillmore and Waller Streets intersection. The proposed zone changes would eliminate density limits for residential development and would establish maximum rather than minimum parking requirements; however, the scale of the neighborhood would not be expected to be substantially different in the future in the Duboce Triangle neighborhood.

AA-59

See Response to Comment AA-57 for a discussion of the existing and proposed policies regarding the protection of existing historic resources. The third paragraph of page 4-169 of the DEIR specifically discusses the potential for changes to existing structures owing to the policies in the Plan calling for infill housing and densification.

AA-60

See Response to Comment H-1 regarding historic resource documentation. No significant impacts are identified owing to implementation of the Plan, therefore no mitigation measures would be required.

AA-61

See Responses to Comments AA-2 and AA-14 for discussion of the public process involved to date in the development of the Plan and for a discussion of the Residential Design Guidelines. As noted in Response to Comment AA-2, the Planning Department is meeting with representatives of the Duboce Triangle Neighborhood Association to address their concerns.

AA-62

See Response to Comment AA-52 regarding the validity of the significance criteria used in the DEIR.

The significance criteria used in making a determination of environmental impacts for Transportation are described on pages 4-203 through 4-2-05 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would have the following transportation impacts in the Project Area: degradation of intersection level of service to LOS E or F, changes to

parking supply and demand, increase in transit demand that could not be accommodated or increase in transit delays, overcrowding of sidewalks, creation of hazardous pedestrian or bicycle conditions, or creation of loading demand that could not be accommodated on-site. It was determined that the Plan implementation could result in potentially significant traffic impacts, some of which could be mitigated to a less than significant level and some, including conversion of Hayes Street to two-way operation, that would be potentially significant and unavoidable. Significant and unavoidable traffic impacts would also occur at the Market/Sanchez/Fifteenth Streets and the Market/Church/Fourteenth Streets intersections in the Upper Market neighborhood. These impacts are discussed on pages4-214 to 4-215 of the DEIR. The Plan would also result in potentially significant and unavoidable transit operational impacts on Hayes Street.

AA-63

See Response to Comment AA-52 regarding the increased density in Upper the Market neighborhood and the validity of the significance criteria used in the DEIR.

The significance criteria used in making a determination of environmental impacts for Air Quality are described on pages 4-252 through 4-253 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would result in conflicts with applicable air quality plans, violate air quality standards, result in a cumulatively considerable increase in criteria pollutant for which the project region is identified as a non-attainment area, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors that would affect a substantial number of people. The DEIR concludes that air quality impacts relating to implementation of the Plan would be less than significant with the implementation of recommended mitigation measures. See also Response to Comment S-6 regarding air quality.

AA-64

See Response to Comment AA-52 regarding the validity of the significance criteria used in the DEIR.

The significance criteria used in making a determination of environmental impacts for Noise are described on pages 4-268 and 4-270 of the DEIR. The impacts discussion evaluates whether any actions recommended in the Plan would expose residents to noises in excess of established

standards, expose residents to excessive ground-borne vibration or noise in association with new construction, cause a substantial increase in ambient sound levels in the Project Area or at specific sensitive noise receptors, cause violations of the San Francisco Noise Insulation Standards or Noise Ordinance, or result in impacts to new uses from existing noise levels. The DEIR analysis concludes that noise impacts would be less than significant with the implementation of the Plan.

AA-65

As noted on page 7-1 of the DEIR, the purpose of an alternatives analysis is to describe a range of reasonable alternatives to the project, including a No Project Alternative, that could meet the objectives of the project, but would avoid or substantially lessen the impacts of the project. CEQA does not require the evaluation of all possible alternatives to the proposed rezoning in the Project Area. As one of the key objectives of the Plan is to increase housing opportunities, the alternatives are focused on retaining the housing opportunities to the extent possible while still reducing the potentially significant and unavoidable impacts. See Response to Comment R-20 for a more detailed discussion of how the alternative was crafted.

AA-66

CEQA Guideline 15126.2 requires that an EIR "focus on the significant environmental effects of the proposed project." Assessing the impact of a proposed project on the environment is generally focused on changes to the environment based on conditions that existed at the time the Notice of Preparation was prepared.

The Environmental Setting discussion included under each technical subsection of Chapter 4, Environmental Settings and Impacts, of the DEIR summarizes the existing environmental conditions and serves as the basis for the impact analysis. In most instances, the impacts resulting from the implementation of the Plan can easily be separated from cumulative impacts and can be directly presented. In other cases, the physical impacts associated with the Plan would occur over a period of time and therefore need to include an assessment of physical impacts expected to occur independent of the Plan.

The project that is being evaluated for this EIR is a neighborhood plan and therefore the implementation of the Plan would occur over a period of time into the future, rather than at a

discrete point of time in the short-term. As such, comparing the implementation of the Plan to a future year, when implementation can be reasonably expected, provides a realistic assessment of the impacts of the Plan for the purposes of analyzing Population, Housing, and Employment, Transportation, Air Quality, and Noise impacts. The 2025 without Plan provides a basis for establishing the specific impacts associated with the Plan. Assessing these impacts against future background conditions provides a conservative assessment of the impacts resulting from the implementation of the Plan and does not minimize the project contribution to the greater cumulative impacts that would occur in the future when the Plan is most likely to be fully implemented.

The No Project Alternative is described in Chapter 7.0, Alternatives to the Proposed Project of the DEIR, starting on page 7-1.

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August 23, 2005

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Major Environmental Analysis Division
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Re: Case No. 2003.0347E—Market & Octavia Neighborhood Plan

Dear Mr. Maltzer:

Per the attached letter I sent you on July 29, 2005 regarding the Case No. 2004.0773E, the Laguna Hill Residential Project, we believe the City of San Francisco (City) has a compelling public interest in preserving the UC Berkeley Extension Campus at 55 Laguna Street (Laguna Campus) so the vital legacy of cultural, educational, aesthetic, and economic benefits of this historic site will be maintained and enriched for future generations of San Franciscans.

The Laguna Campus is a unique educational and open space resource which cannot be replaced. The Laguna Hill Residential Project proposes the virtual disposition of the Laguna Campus, in the form of the demolition of Middle Hall, portions of Richardson Hall and most of the grounds, along with the 85-year commercial lease, is a discretionary action of the University of California that would negatively impact the City's cultural heritage. Therefore, New College of California submitted an alternate concept plan for the redevelopment of the Laguna Campus for analysis as a preservation/public use alternative in the Laguna Hill Residential Project EIR. AB-1

As the following Environmental Review Chronology shows, the Planning Department had ample time to evaluate the impacts of the proposed Laguna Hill Residential Project on the Market and Octavia Neighborhood Plan.

Environmental Review Chronology: Market and Octavia Neighborhood Plan and Laguna Hill Residential Project

December 2002	Draft Market and Octavia Neighborhood Plan Issued
October 2003	Request for Qualifications for Long-Term Ground Lease for Development of UC Berkeley Extension Laguna Street Campus Issued[1]

November 2003	Market and Octavia Neighborhood Plan EIR Public Scoping Meeting Held
January 2004	Market and Octavia Neighborhood Plan EIR Notice of Preparation Issued
February 2004	Summary of Proposed Revisions to the Public Review Draft of the Market and Octavia Neighborhood Plan Issued[2]
May 2004	Historic Resources Study prepared by Page & Turnbull Associates Completed[3]
August 2004	Laguna Hill Residential Project Environmental Application No. 2004.0773E Submitted
December 2004	A Policy Guide to Considering Reuse of the University of California Extension Laguna Street Campus (Policy Guide) Published[4]
June 2005	Laguna Hill Residential Project EIR Public Scoping Meeting Held
June 2005	Market and Octavia Neighborhood Plan DEIR Published
July 2005	Market and Octavia Neighborhood Plan DEIR Public Hearing Held

The proposed Laguna Hill Residential Project would have significant unavoidable impacts on historic resources, public, educational and cultural facilities, open space and recreation. Attachment G of the Summary of the Proposed Revisions to the Public Review Draft of the Market and Octavia Neighborhood Plan (Neighborhood Plan) states, "The reuse of this site is the single largest development opportunity in the plan area." The Neighborhood Plan also states, "This proposal should be developed in keeping with the overall approach of the Market and Octavia Plan." Yet, the Neighborhood Plan DEIR (DEIR) fails to address the impacts of the proposed Laguna Hill Residential Project on the neighborhood.

AB-1

For example, DEIR §4.0, p. 4-89 states, "Koshland Park, on Page Street between Laguna and Buchanan Streets, includes over 37,000-square feet *(0.85 acres)* of recreational, educational and communal garden space in Hayes Valley." The Laguna Campus could potentially provide over three acres of open space to the neighborhood. However, the DEIR does not analyze the potential loss of this open space resource. No mitigation measures have been included because no significant impacts have been identified at the program or project levels.

AB-2

The December 2002 Draft Market and Octavia Neighborhood Plan Policy 1.1.6 states, "Preserve and enhance the role of cultural and educational institutions in the plan area. Major cultural institutions such as City Hall, the Opera House, Herbst Theatre, the SFGLBT Center, and the UC Berkeley Laguna Street Campus are vital assets to the neighborhood and will retain their role as major regional destinations." Again, the DEIR does not address the conflict between the aforementioned Neighborhood Plan policy and the proposed Laguna Hill Residential Project.

AB-3

On one hand, the DEIR completely fails to address the historic and architectural significance of the National Register-eligible Laguna Campus. The document manages to address the history of the site through 1935 and states, "A major institutional development in the Hayes Tract during this period was the Protestant Orphan Asylum, built on the block bound by Waller, Haight, Laguna and Buchanan Streets, on land granted by the city in 1853 and now the site of the University of California Berkeley Extension Center." DEIR §4.6, p. 4-139 However, Laguna Campus is not designated as an historic district in Figure 4-18, "Archeological and Historic Districts" DEIR §4.6, p. 4-148. On the other hand, the DEIR manages to incorporate the traffic impacts of the proposed Laguna Hill Residential Project and states, "Vehicle trips from a new 500-unit residential development proposed for the UC Extension site (at the intersection of Market/Laguna/Hermann Streets) were estimated and manually assigned to the 2025 without Plan traffic volumes." DEIR §4.7, p. 4-207

AB-4

AB-5

The DEIR clearly anticipates the development of the proposed Laguna Hill Residential Project and states, "The UC Berkeley Extension Campus is located on the block bounded by Buchanan, Haight, Laguna, and Hermann Streets. This site is proposed for redevelopment into approximately 500 residential units, some retail space, and community-serving uses. The existing dental clinic on the campus would remain." DEIR §4.2, p. 4-36, but fails to analyze the impacts of said proposed development and zoning change in the context of the implementation of the Neighborhood Plan.

AB-6

The attached letter from Paul Olsen, Hayes Valley Neighborhood Association (HVNA) President and Patricia Walkup, Co-Chair HVNA Transportation & Planning Committee to Supervisors Dufty and Mirkarimi dated July 25, 2005 states:

> *The Planning Department projects that approximately 4400 new housing units will be built in the Market/Octavia area by the year 2025, with most of the units centered along the Market Street corridor between Van Ness and Church Streets. This figure does not include any housing that could be built at the site of the former Laguna Extension campus because, at the time of the Market/Octavia community planning meetings we assumed that UC Berkeley would continue with its educational mission at its Laguna Extension site.*
>
> *Although HVNA has always supported building housing in our neighborhood, we cannot view building housing on empty freeway parcels and on smaller infill sites in the same way that we view the redevelopment of a large, public educational institution than has closed. The UC site is not just another infill project, but is a project of such large proportion that its redevelopment will go a long way toward defining the neighborhood. The former site of the UC Berkeley Laguna Extension has provided a valuable public resource for our city for the past 150 years. In considering how we want to redevelop this property we must consider how the loss of this valuable public resource will affect our community and city as a whole.*

AB-7

Our community believes that retaining a substantial portion of the former UC Extension Laguna campus for educational purposes is the best possible land use for this site, as people living along the densely populated Market Street corridor will need a public area dedicated to serving the community's educational, cultural and recreational needs. If housing is built over this entire site now, all future opportunities to use this site for educational purposes will be forever lost.

AB-7

The attached letter from Paul Olsen, HVNA President and Patricia Walkup, Co-Chair HVNA Transportation & Planning Committee to Jeff Bond, UC Berkeley dated July 25, 2005 states:

Our six-meeting series produced consensus on the following general issues:

Retaining some portion of the site for educational use. Community support for retaining educational use was so widespread that we can conclude that the community would like to see a significant portion of the campus used for this purpose. Some important comments on this issue that were presented at several of the meetings included:

If we build housing over this entire site now, we will forever lose the opportunity to use this site for educational purposes.

AB-8

Communities need more than housing and retail to thrive. In order to create a vibrant, community we need to retain public space that serves the community's educational and cultural needs.

Educational and cultural institutions cannot compete for space in the open real estate market.

The neighborhood's density is expected to increase significantly over the next 20 years. (The Planning Department projects that by the year 2025 the population of the Market/Octavia Plan area will increase by 9,875 people which represents 11.7% of the projected growth of the entire city. The Department also projects there will be an increase of 5,960 new households in the Market/Octavia Plan area by 2025, which will represent 14.5% of the projected growth of the entire city. The vast majority of this population will be centered along Market Street between Van Ness and Church Streets.) A neighborhood with this level of density needs to retain a significant amount of public space for educational and cultural purposes.

Historic preservation of existing buildings was an overwhelming winner in the urban design category, with "preserving all buildings for re-use" receiving the most support. Support to preserve the existing buildings seems to have grown after our forum on historic preservation.

Providing "reduced" parking to "no" parking, along with City CarShare was a runaway winner. The community is very concerned that a high-density housing development that provides a great deal of parking will generate a great deal of traffic in a neighborhood that is trying to reduce traffic and create a pedestrian-friendly environment.

Creating a walkable, pedestrian-oriented environment.

On the issue of "housing," opinion seemed fairly evenly divided, with significant support expressed for "no housing," along with wide support for ideas that would include housing as a component of the site. We suspect that a significant portion of the community that favored "no housing" was concerned about the parking and traffic problems that a large, densely populated housing development could present.

AB-8

Since most people chose to express their priorities by supporting the predominantly broad, generalized categories, we were not able to get a good read on priorities for the range of specific programs discussed at our "brainstorming" meeting. We also realize that, except for overwhelming support to retain a portion of the site for educational purposes, we have just begun to examine and discuss other specific programs for the site, and that we need to continue to investigate additional options.

Both our Board and committee would like to reiterate the one overriding principle that had tremendous appeal to the vast majority of community members: the idea that this site should be used to provide a public benefit to the larger community and bring together and serve all elements of our diverse neighborhood and city in a way that celebrates diversity, stimulates learning, and promotes and reinforces a sense of community. Housing and retail alone cannot create this kind of dynamic interplay.

We concur with HVNA regarding goals for the reuse of the Laguna Campus. We therefore request a comprehensive environmental analysis of the impacts of the Laguna Hill Residential Project be incorporated into the EIR for the Neighborhood Plan so that the Planning Commission and Board of Supervisors can understand the impacts of potential loss of the Laguna Campus within the context of the Neighborhood Plan when they vote on whether to certify the EIR.

AB-9

Sincerely,

Martin Hamilton
President

cc: Jack Robertson, A.F. Evans Development, Inc.
Allen Meacham, University of California, Office of the President
Jeff Bond, University of California, Berkeley
Jane Graf, Mercy Housing California
Supervisor Bevan Dufty
Supervisor Ross Mirkarimi
Michael Farrah, Mayor's Office
Charles Edwin Chase, San Francisco Architectural Heritage
Mark Ryser, San Franciscans for Preservation Planning
Susan Brandt-Hawley, Brandt-Hawley Law Group
Arnie Lerner, AIA, Lerner + Associates Architects
Vincent Marsh, Co-Chair, Friends of 1800
Mark Paez, Co-Chair, Friends of 1800
Paul Olsen, HVNA
Patricia Walkup, HVNA

Attachments:
1) Letter from Martin Hamilton to Paul Maltzer, Environmental Review Officer, Planning Department dated July 29, 2005
2) Letter from Paul Olsen, HVNA President and Patricia Walkup, Co-Chair HVNA Transportation & Planning Committee to Supervisors Dufty and Mirkarimi dated July 25, 2005
3) Letter from Paul Olsen, HVNA President and Patricia Walkup, Co-Chair HVNA Transportation & Planning Committee to Jeff Bond, UC Berkeley dated July 25, 2005
4) Summary of Proposed Revisions to the Public Review Draft of the Market and Octavia Neighborhood Plan, Appendix G

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[1] The RFQ states, "The Campus is seeking to realize a mix of uses including: Retention or replacement of the UCSF Dental Clinics; Market rate, but affordable housing for UC students, faculty and staff; Market rate, but affordable housing for the general public; Neighborhood serving retail space; and Associated open space and parking necessary to support the proposed project."

[2] The revisions include changes to Element 6, New Development on Key Sites which states, "Add a new section iii that discusses the opportunity presented by the redevelopment of the UC Berkeley Laguna Street Campus."

[3] The Historic Resources Report was requested by the Planning Department in conjunction with the environmental review of the Laguna Hill Residential Project.

[4] The Policy Guide states, "This document is intended to provide clarity and guidance to the public, UC Berkeley, and the prospective developers on the relevant policies, planning goals, and urban design standards that should be used to design and evaluate a project and related improvements at this site." Further, "The potential re-use of the

UCBE site was not contemplated by the Draft Market & Octavia Neighborhood Plan (Neighborhood Plan) and rezoning effort currently underway. This document extends the principles and policies of the Neighborhood Plan to the site. It identifies relevant policies, planning goals, and urban design standards for consideration by the public, UC Berkeley and prospective developers. They can be used to design and evaluate a project and related improvements at this site and to provide other relevant historical, socioeconomic and procedural information."

Letter AB – Martin Hamilton, New College of California

AB-1

See Response to Comment N-1 regarding the UC Extension site. The Plan does not make recommendations for land use changes on the UC Extension site. The property owners have applied to the City for an independent EIR for the proposed rezoning/redevelopment proposal. The impacts of the proposed development are taken into account as part of the cumulative transportation analysis for the *Market and Octavia Neighborhood Plan*, but a comprehensive environmental analysis of the specific proposal was not conducted as it is not part of this Plan. The decision on whether to approve or disapprove the proposal for the UC Extension site will be made by the Planning Commission and the Board of Supervisors independent of the Market and Octavia Neighborhood Plan decision.

AB-2

See Response to Comment L-9 regarding the impacts on public parks.

AB-3

See Response to Comment N-1 and AB-1 regarding the UC Extension site and the analysis approach used in the DEIR.

AB-4

The following historical information about the University of California Berkeley Extension Campus is taken from the Laguna Hill Residential Project, Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meetings. The documentation accompanying the NOP concluded that the UC Extension is a historical resource under the California Environmental Quality Act.[42]

All of the former UC Extension buildings on the site were constructed between 1924 and 1935 as the campus of the San Francisco State Teachers College, which conveyed the property to the

[42] City and County of San Francisco, Planning Department, *Case No. 2004.0773E - Laguna Hill Residential Project, Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meetings*, June 2005.

University of California when it relocated to its current campus on 19th Avenue in the 1960s. The buildings generally exhibit the Spanish Colonial Revival style of architecture with red tile roofs and stucco siding. Woods Hall, constructed in 1926, is a two-story L-shaped building located at the northwestern corner on the upper terrace of the site along Buchanan and Haight Streets. Attached to Woods Hall is Woods Hall Annex, constructed in 1935, located along Haight Street and positioned on the lower terrace. Richardson Hall, constructed between 1924 and 1930, is a one and two-story, L-shaped building located on the lower terrace of the site at the corner of Hermann and Laguna Streets. The Laguna Street elevation of Richardson Hall is a two-story auditorium and an attached single-story administration building. Middle Hall, originally built as a gymnasium in 1924 with classroom and office space added later, is a one-and-a-half to two-and-a-half-story building located behind (east of) the west wing of Woods Hall. The Dental Clinic was constructed in the 1970s, and is currently occupied by the UCSF Dental School.

The project site contains four buildings that were built between 1924 and 1935, including Richardson Hall, Woods Hall, Woods Hall Annex, and Middle Hall, which generally exhibit the Spanish Colonial Revival style of architecture. These buildings have been the subject of a Draft Historic Resources Evaluation (HRE) that analyzes the potential historical and architectural significance of these buildings. The HRE suggests that some or all of the buildings may be eligible for listing in the California Register of Historical Resources, and are thus considered to be historic resources under CEQA (CEQA Guidelines Section 15064.5).[43]

AB-5

Comment regarding the inclusion of the residential trip generation from the proposed Laguna Hill Residential project in the DEIR transportation analysis is noted.

AB-6

See Response to Comment N-1 and AB-1 regarding the UC Extension site and the analysis approach used in the DEIR.

[43] Ibid.

AB-7

Comment letter from the Hayes Valley Neighborhood Association regarding the UC Extension site is noted. See Response to Comment AB-1 regarding the UC Extension site and the analysis approach used in the DEIR.

AB-8

Comment letter from the Hayes Valley Neighborhood Association regarding the UC Extension site is noted. See Response to Comment AB-1 regarding the UC Extension site and the analysis approach used in the DEIR.

AB-9

Comment regarding the concurrence of the New College of California concurrence with the Hayes Valley Neighborhood Association letters is noted. See Response to Comment AB-1 regarding the UC Extension site and the analysis approach used in the DEIR.

CASTRO AREA PLANNING + ACTION

584 CASTRO STREET
PMB 169
SAN FRANCISCO, CA
94114-2588

Paul Maltzer
Environmental Review Officer
Planning Department, 1660 Mission Street
San Francisco CA 94103

Re: Market and Octavia Better Neighborhoods Draft Environmental Impact Report

Dear Mr. Maltzer,

Castro Area Planning + Action (CAPA) and its members have been early and enthusiastic supporters of the Planning Department's "Better Neighborhoods" Plan for the Upper Market and Octavia Boulevard area. The Plan's goal is to ensure the continued vibrancy and livability of the area. This will be achieved by supporting well designed, high density infill housing, neighborhood service businesses and services, and discouraging automobile use through improved pedestrian, bicycle and transit service and eliminating requirements for off-street parking. CAPA supports the goals and recommendations of the Plan as a sound and sustainable policy for San Francisco. AC-1

CAPA accepts the findings of the Environmental Impact Report, and the potential impacts are mitigated by the many benefits that the implementation of the plan will bring to the Upper Market Area, which extends into the Castro District. The EIR reports that in most areas the impacts will be less than significant.

The report anticipates "significant impacts" on automobile traffic in many parts of the neighborhood. Unfortunately, the CEQA Standards for environmental impact reports is limited to studying the impacts only on automobile traffic, and transit service as separate areas. Thus the real impact cannot be reported. Thus the anticipated degradation of automobile traffic levels of service must be considered in light of the improvement in the "level of service" for pedestrians (in the form of traffic calming measures, safer sidewalks and easier pedestrian access to businesses and services), bicyclists (additional lanes and facilities) and transit users (preferential lanes, signal preemptions and improved boarding platforms). Further, by limiting the amount of off-street parking and providing neighborhood serving businesses within walking distance, the use of the automobiles for transportation will be greatly reduced in the neighborhood. AC-2

We hope that the Planning Commission will take this into consideration of the Draft Environmental Impact Report. This plan has been crafted over many years with hundreds of neighborhood residents who fully support the goals of the plan and eagerly await new developments that will improve their neighborhood by completing it.

Thank you.

Sincerely,

Joe Curtin, President

Letter AC – Joe Curtin, Castro Area Planning + Action

AC-1

Comment regarding support for the Plan and the DEIR is noted.

AC-2

Comment regarding the limitation of the CEQA standards for transportation analysis is noted. At the time of the DEIR's scoping of the transportation section, intersection level of service was the City's adopted methodology to evaluate the project's contribution for significant impacts to traffic operations (see Response to Comment L-12). Developing a new methodology to evaluate significance criteria in the City of San Francisco would require a change in City policy. This policy change would require a consensus among policy makers and is therefore not appropriate to include in this DEIR analysis.

August 22, 2005

received
8/22/05

Paul Maltzer
Environmental Review Office
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer,

I have the following comments on the DEIR for the Market/Octavia Plan.

Residential Infill in Established Neighborhoods

The plan encourages additional housing throughout the Project Area, including established neighborhoods west of Church Street, such as the Duboce Triangle. By eliminating density limits and parking requirements, and by requiring a 2- for- 1 dwelling unit replacement, the plan creates economic incentives to maximize the buildable area and unit density on every lot (in real estate terms: the "highest and best use"). This could lead to outright demolition or "de-facto" demolition of existing sound buildings, through substantial remodeling or additions. While the plan states that demolition will be limited, no specific restrictions are included. AD-1

The plan supposes that development would occur on empty infill lots and "soft sites" where less than 5% of the building potential is used. However, given the high values of housing, development is also likely to occur on existing sites where significantly more than 5 % of the buildable area is already used. Many 2 and 3 story buildings, of 2 or 3 units, could be transformed by the economic incentive to maximize built area and density. AD-2

The plan also calls for most buildings to be built to the property line at the public right of way. In the established neighborhoods mentioned above, many buildings are set back some distance from the front property line, with small front yards or stairs. Current zoning rules respect this pattern through "front yard" averaging provisions. The plan does not specifically indicate how this pattern will be respected and maintained in existing neighborhoods. AD-3

Contrary to the stated conclusion under "4.2.2 Impact Analysis", the factors mentioned above could have a substantial impact on the existing character in these established neighborhoods, and specific mitigations should be required. AD-4

Traffic Impacts

Several intersections will experience increased delays. These include Market/ Sanchez/ 15th and Market/ Church / 14th, as well as others in the plan area. The DEIR describes these impacts as " significant and unavoidable" because the feasibility of needed mitigations have not been fully assessed. The degradation of traffic flows at these intersections affects all modes of transit, except underground Muni. Pedestrians, bicyclists, busses and street cars will all experience delay. AD-5

If the impacts are allowed to remain " significant and unavoidable", this transit-oriented plan will have the effect of degrading transit service in the plan area. The DEIR should complete the necessary assessments so that policy makers can judge the effectiveness of mitigations. Most importantly, for the plan to be successful, creative solutions and genuine traffic mitigations should be required to prevent the projected increase in delays.

Sincerely,

Curt Holzinger

Curt Holzinger
215 ½ Henry Street
S.F., CA 94114

Letter AD – Curt Holzinger

AD-1

Under the Plan, the Duboce Triangle neighborhood would be located in the proposed Neighborhood Commercial Transit (NCT) District and Residential Transit Oriented (RTO) Districts. As the commentor notes, under the proposed Plan, the Duboce Triangle neighborhood is subject to a 2:1 replacement ratio for residential units that would be demolished, while other areas west of Church Street are subject to a 3:1 replacement. The proposed rezoning requirements concerning demolition that are analyzed in the DEIR are more restrictive and expanded than under the existing *Planning Code.* Under existing conditions, without implementation of the *Draft Market and Octavia Neighborhood Plan* , Section 243 (H) of the *San Francisco Planning Code* permits demolition of existing residential uses with a conditional use (CU) permit. Section 245 (H) of the *Planning Code* states:

> "All demolitions of buildings containing residential use and all conversions from residential uses to nonresidential uses above the ground floor shall be permitted only if authorized as a conditional use under Section 303 of this Code, unless the Superintendent of the Bureau of Building Inspection or the Chief of the Bureau of Fire Prevention and Public Safety determines that the building is unsafe or dangerous and that demolition is the only feasible means to secure the public safety. When considering whether to grant a conditional use permit for the demolition or conversion, . . . consideration shall be given to adverse impact on the public health, safety, and general welfare of the loss of housing stock in the district and to any unreasonable hardship to the applicant if the permit is denied."

In December 2003, the Planning Commission enacted a temporary policy requiring mandatory discretionary review of all applications for demolition of residential structures not subject to conditional use for demolition, and review and approval of such applications (Planning Commission, Resolution No. 16700).

Under the existing *Planning Code*, there is no specific requirement for demolition of affordable units.

In the Residential Transit Oriented (RTO) and Neighborhood Commercial Transit (NCT) Districts,

a 2:1 and 3:1 replacement ratio is required, and a 1:1 replacement for affordable units. Due to the replacement controls proposed by the Plan, the elimination of density limits and parking requirements would encourage maximum housing opportunities, but would not permit or encourage demolition of existing, sound structures. Remodeling of existing structures to increase residential units would have to occur within the existing building envelope, and would be subject to the Building Code requirements (lot coverage, light and air, room sizes, entrances, plumbing, etc.) and plan check and approval by the City Bureau of Building Inspection. While remodeling of existing structures could result in increasing the number of units within an existing building, this overall increase would be expected to be minimal given the age of the existing housing stock in the Plan area, and that most existing buildings are likely to have already maximized their unit capacity.

AD-2

Although the Plan provides an assessment of build-out potential in the Project Area that includes an analysis of soft-sites (those sites on which the existing conditions are five percent or less of the building potential – see page 201 of the Plan) these are not the assumptions that were used for projecting growth in the Project Area in the DEIR. See Chapter 4.3, Population, Housing, and Employment, pages 4-63 to 4-72, of the DEIR for a discussion of the *LUA 2002* projections used in projecting future population and employment growth.

Development could occur on existing sites (soft sites) where more than five percent of the building potential is being used. The Plan encourages maximum housing opportunities that are balanced within Plan objectives and existing *General Plan* policies to preserve existing housing, and prohibit residential displacement. Assuming that development would occur only on soft sites in the future, however, is the most conservative estimate of physical capacity for new development in the Project Area and takes into account only those sites where 95 percent of the building potential is not being used, and therefore would create a strong economic incentive for potential development. The DEIR projected that development would occur throughout the Project Area over the next 20 years and would not be limited to the identified soft sites (housing development on 5 percent soft sites alone would be less than the overall projected growth for the Project Area).

On sites where a higher percentage of building potential is being used, the economic incentives to demolish existing structures would depend on the maximum number of units that could be built, development costs, including inclusionary housing requirements, and market rents or sales prices

that could be commanded. On sites where there are existing residential uses, the proposed Plan prohibits residential displacement unless demolition would ensure a net addition of new housing, including affordable housing units.

As stated on page 3-21 of the DEIR, Objective 2.3 of the *Draft Market and Octavia Neighborhood Plan* is to maintain "Existing, sound housing stock that is preserved and enhanced." The Plan's fundamental goal of maximizing housing stock would be targeted at in-fill development on soft sites (including sites where there is more than five percent of building potential being used); limiting demolition, removal, or clearing of housing; and discouraging dwelling unit mergers. Maximizing housing opportunities by demolition of existing sound units is not encouraged by the Plan. Refer to the Response to Comment AD-1 concerning demolition of existing residential units.

AD-3

As discussed in the first sentence of the fifth full paragraph on page 3-22 of the DEIR, the *Planning Code* and *Zoning Map* changes proposed by the *Draft Market and Octavia Plan* would require that most (not all) new buildings be built to the property lines of pubic rights-of-way. As stated in the second full paragraph on page 4-99 of the DEIR, the Plan guidelines for massing and articulation call for future buildings to be built to the property lines and to face the public right-of-way. This statement summarizes Policy 3.1.1 of the Plan concerning Massing and Articulation. The proposed rezoning for neighborhoods west of Church Street, including Duboce Triangle, would be in the Neighborhood Commercial Transit (NCT) District and Residential Transit Oriented (RTO) District.

Page 50 of the *Draft Market and Octavia Neighborhood Plan* states that within the proposed NCT district "setbacks to accommodate wider sidewalks, recessed entries, or to mark entrances are permitted but limited to the ground floor. In the RTO districts, setback of the entire building mass to accommodate stoops and other forms of transitional spaces are permitted where there is a prevailing pattern of setbacks along the street.

As noted above, the Plan recognizes the prevailing setback patterns that currently exist in the neighborhoods west of Church Street, including Duboce Triangle. Following approval of the Plan by the Planning Commission, the Board of Supervisors must adopt CEQA findings and a mitigation program if required, adopt necessary amendments to the *General Plan*, and make *Planning Code* Section 101.1 Priority Policy findings before adopting the Plan. If the Plan is adopted by the Board

of Supervisors, changes to the *Planning Code* may be implemented which specify setback limits and requirements. There would be an opportunity for public comment on the proposed setback limits at that time.

AD-4

See Response to Comment AA-52 for a discussion of the significance criteria and impacts analysis for land use and zoning.

Based on the land use and zoning analysis completed for the DEIR (see pages 4-42 to 4-62), it was determined that there would be no significant impact on land use associated with the implementation of the Plan. No new information has been presented that would alter the conclusions of the DEIR.

AD-5

The intersections of Market Street/Sanchez Street/15th Street and Market Street/Church Street/14th Street would operate at LOS E with and without the Plan under 2025 future conditions. Although minor changes in signal timing and the implementation of a right-turn pocket on 15th Street would reduce average delays at these intersections, the changes would need to be coordinated with other traffic and transit operations in the area. Because implementation of these mitigation measures could be limited by physical constraints of the existing right-of-ways, signalization coordination limitations along Market Street, and/or potential impacts on bicycle and pedestrian safety at the major intersections, the potential for a significant and unavoidable impact may still exist.

As stated under CEQA, the DEIR is an informational document to identify all potentially significant effects of a project on the physical environments and determine the significance of the impact. When a significant impact is determined, the approving agency may adopt a written statement of overriding considerations which finds that specific economic, social or other considerations make the DEIR's mitigation measures or project alternative(s) infeasible. As such, although the goals and objectives of the Plan are to "Improve the operation and convenience of all transportation modes required for a vibrant transit-oriented place, with a focus on transit, bicycle, and pedestrian movements," (page 3-2 of the DEIR) the City would need to adopt a written statement of overriding consideration to approve the Plan as proposed.

Adjustments to traffic signal timing and coordination are undertaken by the Department of Parking and Traffic on a regular basis throughout San Francisco. Any changes at the intersections of Market Street/Sanchez Street/15th Street and Market Street/Church Street/14th Street that may occur between now and the implementation of the Plan would be established by DPT as part of their regular traffic monitoring program.

4.0 PUBLIC HEARING COMMENTS AND RESPONSES

This chapter contains a transcript of comments made at the public hearing on the DEIR and the responses to each of those comments. Each substantive comment on the DEIR is labeled with a number in the margin and the response to each comment is presented following the commentor's remarks. Where responses have resulted in changes to the text of the DEIR, these changes would also appear in the Final EIR.

Public Hearing Comments – James Haas

Madame President, Commissioners. I am James Haas. I am the Chairman of Civic Pride, the Civic Center Advocacy Group, and I recently coordinated a stakeholders meeting of Civic Center groups, or People for the Mayor, and some of you attended.

The Market Octavia Plan and the EIR cover four blocks of the Civic Center Historic District; and if you look at the General Plan, the Civic Center General Plan, some 12 blocks.

I need not tell you about the significance of Civic Center as a concept, or the historic nature of the building, and I probably don't need to tell you about the significance of the Performing Arts and educational institutions that reside there.

Those arts and educational organizations are not static. Since 2001, we have had the Asian Art Museum come. I have just learned that the Girls Chorus has established a facility for their 300-person student body on Page Street. The Conservatory of Music will open next year, and the School District has its School for the Arts project at 135 Van Ness. 1

These arts organizations have a tremendous influence on the eastern half part of the planning area, including the million visitors who come a year, and their effect on the commercial area.

But the Draft EIR makes virtually no reference to Civic Center or these arts organizations in the presentation.

The most egregious aspect of this is in the historic section where it deals with Indians and Spanish, and the building of housing in Hayes Valley. The Plan does not even mention Civic Center, or anything that ever happened there from the time of the old City Hall in 1870 to today.

The Plan does not reference the Arts Element of the General Plan, or the Civic Center element of the General Plan and the goals there and how that affects the area and how the area can help flourish the arts. 2

The parking section is a mess, because it does not deal with the needs of parking, short-term parking for the visitors of the arts, educational and governmental agencies that reside there. 3

And I think it's a little naïve to think that the neighborhood commercial is strictly there to serve the neighborhood. The restaurants, and most of the shops there are destination shops, and they need to be characterized in the right way to make this report accurate and complete. 4

I have submitted an eight-page critique of the report, with some 23 items that need correction or adjustments, and I think it will take your staff several months to deal with all of these items.

Response to Comments by James Haas

PH-1

See Responses to Comments A-1, A-6, A-10, A-11, A-13 and A-18 through A-24 regarding the incorporation of the Civic Center area into the DEIR.

PH-2

See Responses to Comments A-10 and A-11 regarding the addition of text relevant to the Civic Center Plan and the Arts Element to the DEIR.

PH-3

See Responses to Comments A-2, A-3, A-14, and A-25 through A-29 regarding the parking analysis for the DEIR and the presentation of updated parking data.

PH-4

See Responses to Comments A-14 and A-17 regarding the acknowledgement that retail uses in the Project Area are visitor and neighborhood serving.

Public Hearing Comments – Christopher Pederson

Yes. My name is Christopher Pederson. I live practically in the middle of the Market and Octavia Plan area.

I'd like to start off by saying that I strongly support the Market and Octavia Plan.

I'd like to step back for a moment to kind of give a big picture, which I think is so crucially important when you are doing environmental analysis.

I think the most significant causes of environmental degradation over the past century has been the sort of low-density, automobile-dependent patterns of development. This kind of development consumed an inordinate amount of land, natural resources and energy, and contributes to a very wide range of adverse environmental effects, including global warming.

It is exciting to see the City consider innovative approaches to urban planning with the goal of encouraging more environmentally sustainable patterns of land use and transportation. 5

I especially support policies in the Plan that encourage the creation of more housing, limit parking, and calls for improvements to public transit in the area.

I do have a number of concerns about the Draft EIR, however. First of all, it has taken an absolutely inordinate amount of time to actually produce this Draft EIR. And having read it, I am sort of left scratching my hear wondering why it took so long.

The second concern is, although the report does analyze various potential adverse effects of proposals in the Plan, it doesn't provide much description analysis of the environmental benefits of proposals in the Plan.

And I think that is very important, because once you are looking at proposed alternatives, the mitigation measures that would delete or undermine provisions of the Plan, it's important for decision-makers to be able to understand both the environmental benefits, as well as potential adverse effects. Without that full range of information, the City is not in a position to make responsible decisions about mitigation and alternatives. 6

I'd also like to comment on the EIR traffic analysis. The basic assumption that this EIR makes is that the level of service is somehow an attribute of the physical environment. And I think that is a mistaken assumption that the EIR fails to analyze and to justify it.

Level of service is simply a measure of the delay, the cars in the area intersections. Certainly, those delays can have a range of environmental effects. Delays can potentially increase air pollution, or they can have beneficial effects. They can encourage people to use other modes of transportation. It can result in, you know, calmer traffic that is better for the neighborhood. 7

Response to Comments by Christopher Pederson

PH-5

Comments regarding support of the Plan are noted. See Response to Comment L-1 regarding the schedule for preparation of the DEIR.

PH-6

See Responses to Comments M-1 and R-1 the analysis of plan benefits in the DEIR.

PH-7

See Responses to Comments R-7 through R-10 regarding the methodology used to perform the transportation analysis for the DEIR.

Public Hearing Comments – Bonnie Jones

Thank you. Good afternoon, Commissioners. Bonnie Jones, native San Franciscan. Never heard that so much in one day. It's very exciting.

On behalf of the Opera, Ballet and Symphony, along with the support of the Asian Art Museum, the San Francisco Conservatory of Music, San Francisco Performances, City Arts and Lectures, and the San Francisco Performing Arts Library Museum, I am here to make a public comment on the Draft EIR for the Market and Octavia Neighborhood Plan.

While these performing arts organizations and their partners are supportive of the Market and Octavia Plan and the housing that is programmed to be built over the next years, we believe the City should not ignore the impact of the loss of thousands of parking spaces that are relied upon by patrons and union employees of the City's cultural and performing arts organizations. 8

In reviewing the draft, our concerns are with the following issues:

The draft does not seek adequately, and does not discuss the removal of hundreds of off-street parking spaces near Civic Center in order to build housing, and how such actions will severely disrupt both patron parking and contractually require union employee parking for the Performing Arts.

The draft does not include a recommendation that the 1,350 lost off-street parking spaces in the immediate Civic Center area be at least replaced. 9

The draft EIR does not adequately discuss the available parking for peak period performances. When they are fully occupied, it's been maximized. While all of our organizations continually promote and encourage public transportation and car pools, the use of public transportation will not replace lost parking. 10

Public transit is not an available option for many members of the Performing Arts audience, nor for the musicians, dancers, and other artists performing for the Symphony, Opera and Ballet, nor for the more than 600 unionized workers that support them. 11

The draft EIR does not adequately discuss how the opening of the Asian Art Museum has significantly increased parking demands at Civic Center area, and now the new Conservatory of Music School for the Arts at 135 Van Ness Avenue, rehabilitation of Norse Auditorium at the corner of Hayes and Franklin Streets, the expanded International School at 150 Oak Street, and the proposed new City Law Library at 525 Golden Gate Avenue will further increase demand. 12

In conclusion, the Symphony, Ballet and Opera serve not only San Francisco, but a world-class cultural organization that serves the entire Bay Area region, drawing thousands of visitors to San Francisco each week. 13

We believe the Draft EIR should more adequately examine the impact on the Performing Arts organizations.

We further request that the Plan incorporate an additional mitigation measure to address these impacts; namely, a request that the City replace 1,350 parking spaces. 14

I have also an extensive submittal in writing on behalf of the organizations.

And thank you for your time. Thank you for serving.

Response to Comments by Bonnie Jones

PH-8

See Responses to Comments A-26, A-28, and C-1 regarding the parking loss associated with development in the Project Area.

PH-9

See Response to Comment A-32 for status of City study on Civic Center Parking needs.

The Plan discourages the construction of new parking facilities in the Project Area. New housing would replace existing surface lots, particularly along the Central Freeway Corridor.

PH-10

See Responses to Comments A-26, A-32, and C-1 regarding parking availability for peak period performances in the Civic Center.

PH-11

See Responses to Comments A-2, A-11, and A-26 regarding the provision of parking for visitors and performers to the Civic Center and transit policies recommended in the Plan.

PH-12

See Response to Comment A-30 regarding new parking demand generated by expansion of non-residential uses in and near the Project Area.

PH-13

See Responses to Comments A-10 regarding incorporation of language pertaining to the Arts Element in the DEIR and A-26 regarding new parking data for the Project Area.

PH-14

Comment requesting replacement parking is noted. See Responses to Comments A-32 for status of City study on Civic Center Parking needs and PH-9 regarding the Plan recommendation for establishing new residential uses in the Project Area.

Public Hearing Comments – Paul Olsen

President Lee and Commissioners, thank you for being here this afternoon and hearing this very important item.

As a third-generation San Franciscan and President of the Hayes Valley Neighborhood Association, I have joined with my neighbors over the last five years of meetings, walking tours and bus tours which produced a very solid, very important Market-Octavia Plan, because of the education, the information, the consensus that was built over those five years.

The Hayes Valley Neighborhood Association passed two resolutions supporting the Market-Octavia Plan, particularly regarding issues of high-density housing and the transportation plan. 15

We very much appreciate the hard work that is done by the Planning Department in concert with the community in developing the Market-Octavia Plan, strongly support the Plan, and urge you to support the transportation improvements within the Plan.

We do have some concern in the Draft EIR, and we are submitting a letter and comments on analysis of transportation improvements, and request your consideration of these comments.

I will make my remarks brief, but I do have those handouts for you.

Thank you very much.

Response to Comments by Paul Olsen

PH-15

Comments regarding support of the Plan noted. See Responses to Comment Letter M regarding concerns expressed by the Hayes Valley Neighborhood Association.

Public Hearing Comments – Pamela Duffy

Good afternoon, Commissioners. My remarks are very brief and very technical.

I call your attention to Figure 4-4 in the Draft EIR, entitled "Proposed Generalized Height Districts." I believe that it is in error, and it is an understandable one, no criticism of the EIR preparers.

The Market and Octavia Plan has different height limits than those that are shown in the Draft EIR, and I believe that is just totally inadvertent, because the Market Octavia Plan, at page 30, has a color chart, bar chart, that shows the height limits, and is very difficult to differentiate the height limits, where they are intended. After some study, you can deduce what it is.

16

So I suggest that that be examined more thoroughly as a technical cleanup, because I believe the Plan is correct.

Basically, the error here is the area that is shown as a height limit of 96 to 120 feet. It is actually supposed to be 112 feet, with a 200-foot tower. In other words, another, as far my math, 80 feet.

So I would appreciate review of that. And if in fact we have misread the Plan and not misread the Draft EIR that would be of great interest.

Thank you.

Response to Comments by Pamela Duffy

PH-16

See Response to Comment E-1 confirming the accuracy of the height limits depicted on Figure 4-4.

Public Hearing Comments – Kate White

Kate White with the San Francisco Housing Action Coalition.

This is a very happy day for the Housing Action Coalition, and we are – for all of those of us who first advocated a secured funding for the Better Neighborhood Program back in 1999.

Finally, the first neighborhood-wide EIR is before you. And I have discussed earlier in the day in a hearing about the Better Neighborhoods Plus legislation, we hope that moving forward, the EIR and Plan can actually work concurrently and not one after the other, stretching the time out so long so that it is actually years after the Plan has actually been looked at. 17

We would love someday for the Department to speak in one voice, with the long-range planning and the environmental review hand in hand.

We are dealing with quickly to verify the EIR. And, again, that will help move swiftly – more swiftly to get the Plan moving forward so that so many of the neighborhood people stakeholders who have participated in this Plan can celebrate it, and it can be a good – a wonderful guide for the Market and Octavia neighborhood.

While it is a very good analysis based on current standards for environmental analysis, and it is complete, we are disappointed that the analysis does not highlight some of the environmental benefits, such as less driving, more walking and more bicycling that will clearly occur with the wonderful street and sidewalk improvements that are included in the Plan, and the increase in car-free, or car-sharing residents that will be attracted to this wonderful neighborhood, with the parking as proposed, and with the transportation improvements.

So we urge you to adopt the EIR, move forward swiftly on the Plan, congratulate the Staff on all their hard work, and we look forward to – we know the Transportation Authority is looking at some new framework for analyzing, follow-up level of service and looking at pedestrians and bicycles as traffic, not just cars, and hope that that, maybe later on, could help inform some revisions to the EIR analysis. But we urge you to move forward quickly on this. 18

Thanks.

Response to Comments by Kate White

PH-17

Comments regarding future improved coordination in Plan development and environmental evaluation processes are noted.

PH-18

Comments urging adoption of the Plan are noted. See Responses to Comments M-1 and R-1 for discussion of Plan benefits and Responses to Comments R-7 through R-10 regarding alternative

methodological approaches.

Public Hearing Comments – Commissioner Michael J. Antonini

Thank you.

I appreciate the effort on this. I think it is a very good report.

I do agree with those who commented regarding the parking needs connected with the arts in the Civic Center. I think it's, in reality, that a lot of people who are patrons will be driving in, and that is only going to increase with the additional arts that will be coming into the area, not to mention what hopefully might be the development of more arts in the Theater District in mid-Market, if it comes to pass. 19

I also think the fact that the new Octavia Boulevard will let people off right at Market and Octavia. I think almost all people who will be coming by auto will, you know, continue and take that approach and be looking for a place to park somewhere in the area. 20

So I think it behooves us, for those of us who want to minimize the effects of the traffic to, you know, make sure that analysis is made properly and that we do replace those surface parking places that are being lost. I think it's good that they are being replaced. I think we are going to have very aesthetic replacements, but I think that the demand will still be there in the area, and we need to look at that carefully and reflect it, you know, in our planning and in the EIR. 21

I also think, and this is a little bit more of an aesthetic concern, but I think in terms of visual environment, I know that the dot which is going to be the housing that will be built along the new boulevard, there is a design contest, and I would just hope that it is reflective of the neighborhood when it's built. In terms of the visual environment, I think that's an important thing. While not dictating design, I think that that is a scarce commodity, and we have a chance to make something that is visually pleasing, and I hope that that is reflected in the final decision that is made in terms of the housing that is built there. 22

Response to Comments by Commissioner Michael J. Antonini

PH-19

See Response to Comment A-32 for status of City study on Civic Center Parking needs.

PH-20

Comment noted. See Response to Comment A-32 for status of City study on Civic Center Parking needs.

PH-21

The Plan does not advocate the replacement of parking that is displaced as a result of proposed development in the Project Area. The policies in the Plan "discourage new public parking facilities."

The recommendation not to replace parking lost through the redevelopment of vacant parcels was a conscious decision made during the plan development process. The benefits of Transit-Oriented Development, increased housing production, the potential for reduced housing costs, and improved street environment were weighed against the provision of replacement parking. The recommendation to prioritize transit was chosen over the option of providing more parking.

The analysis of parking impacts is provided in the DEIR on pages 4-230 through 4-238. Upon certification of the FEIR, the Planning Commission will decide whether to support the adoption of the Plan including the recommended parking policies based on the impact assessment provided in the EIR.

PH-22

The design of individual projects proposed within the Project Area would undergo further review as each specific proposal is put forward. The design guidelines recommended in the Plan call for new buildings that contribute to the beauty of the built environment and the quality of streets as public space and provide specific design guidelines, pertaining to massing and articulation and how the buildings relate to the streets and open space, to ensure that new development adheres to principles of good urban design and protect the character of the established residential neighborhood.

Public Hearing Comments – Commissioner Bradford Bell

I wanted to echo what Kate White said about the transportation. It is a walkable community. Bike lanes are there. I am one of those people that just sold their car, and I am really looking forward to being able to walk some of these nice neighborhoods we have.

I am waiting for the Third Street light rail to come, so I can get up to Bayview, but I am also looking forward to being able to be in a transit-first area, like around Market-Octavia. Lots of wonderful businesses there. I mean, a great place to come. I love, love, love going to the Symphony and being able to walk the area now and not worry about issues of traffic around there. I think it is going to make it such an attractive and beautiful area. 23

I, too, wish that it highlighted the walkable areas a little bit more and the fact it's going to be such an incredible transit-first district.

Response to Comments by Commissioner Bradford Bell

PH-23

Comments noted. See Responses to Comments M-1 and R-1 for discussion of the benefits of the Plan.

Public Hearing Comments – Commissioner Kevin Hughes

Thank you, Madame President.

Very briefly, I just – similar to the item on calendar ahead of us, or before this, I just wanted to thank everyone for taking the time to come out. We will take a look at it with regards to the traffic analysis, the impact on parking. 24

Certainly look at it with respect to the assertion of a removal of 1,350 off-street parking spaces that the document is alleged to be silent on. So we will look at that closely.

That there is no description of the benefits of the Plan. We will take a look at that. I don't know that CEQA requires that, but we will certainly, in the event that that it does, Staff would need to respond on that. 25

And then the changes on height districts and Section 4.4, would changes on height be consistent that are contained in Section 4.4. And we will lay all those accordingly. 26

And again, thank you for taking the time to come out.

Response to Comments by Commissioner Kevin Hughes

PH-24

See Responses to Comments A-26, A-28, C-1, and R-7 through R-10 regarding the loss of parking, the presentation of updated parking data, and the transportation methodology.

PH-25

See Responses to Comments M-1 and R-1 for a discussion of the benefits of the project.

PH-26

See Response to Comment E-1 confirming the accuracy of the height limits depicted on Figure 4-4.

5.0 STAFF-INITIATED TEXT CHANGES

This section contains changes to the text of the DEIR that were determined appropriate by the EIR preparers subsequent to publication of the DEIR. Where a text change is provided in direct response to a particular public comment, the corresponding comment number is provided in brackets at the end of the text change. The text changes with no bracketed notation were initiated by staff.

- The text in Chapter 1, page 1-1 of the DEIR, last sentence is revised to read as follows:

  "The EIR covers adoption of the Plan, amendments to the *San Francisco Planning Code* and *Zoning Maps*, amendments to the *San Francisco General Plan,* amendments to the *Western Addition A-2 Redevelopment Plan*, and adoption of Urban Design Guidelines."

- The text in Chapter 1, page 1-2 of the DEIR, second paragraph, second sentence is revised to read as follows:

  "The Project Area lies to the west of the City's downtown financial district and is bordered on the northeast by the City's Civic Center area, a portion of which is included in the Project Area." [A-1]

- The text in Chapter 1, page 1-2 of the DEIR, third paragraph, first sentence is revised to read as follows:

  "The Plan would govern future developments and public improvements in portions of the Hayes Valley, Duboce Triangle, South of Market West (SoMa West), Mid-Market, Civic Center, and Upper Mission neighborhoods in San Francisco." [A-1]

- The text in Chapter 1, page 1-8 of the DEIR, third bullet at the bottom of the page is revised to read as follows:

  "The elimination of minimum residential parking, requirements and the

establishment of parking caps in the Project Area ~~remains a controversial issue~~ could increase the competition for limited parking in the neighborhood." [M-14]

- Text in Chapter 1, page 1-8, of the DEIR is revised to add the following language as a fourth bullet under Areas of Known Controversy:

  - "Providing adequate short-term parking for visitors in the Civic Center area." [A-3]

- The text in Chapter 1, page 1-32 of the DEIR, second paragraph of Proposed Mitigation Measure 5.7.G.1 is revised to read as follows:

  "As such, this mitigation measure would lessen delay and congestion at the intersection of Hayes Street/Van Ness Avenue ~~in order to maintain acceptable intersection levels of service operations, the Plan could note be implemented on Hayes Street~~." (L-14)

- The text in Chapter 3, page 3-3 of the DEIR, first full paragraph, second sentence is revised to read as follows:

  "The Plan would govern future developments and public improvements in portions of the Hayes Valley, Duboce Triangle, South of Market West (SoMa West), Mid-Market, Civic Center, and Upper Mission neighborhoods in San Francisco." [A-4]

- The text in Chapter 1, page 1-14 of the DEIR, first paragraph, first sentence of Mitigation Measure 5.6.A2 is revised to read as follows:

  "This measure shall apply to any project involving any soils-disturbing activities including excavation, installation of foundations or utilities or soils remediation beyond a depth of four feet and located within those properties within the Project Area for which no archaeological assessment report has been prepared, including by a qualified MEA staff."

- The text in Chapter 3, page 3-4 of the DEIR, second paragraph, second sentence is revised to read as follows:

"The Project Area lies to the west of the eCity's downtown financial district and is bordered on the northeast by the Civic Center area, a portion of which is included in the Project Area." [A-5]

- Figure 3-1, page 3-5 of the DEIR is revised to correct the boundaries for the *Western Addition A-2 Redevelopment Plan* area. See Figure 3-1 on the following page.

The following text is added in Chapter 3, page 3-7 of the DEIR, as the last two sentences of the first paragraph:

"The use districts within the portion of the *Western Addition A-2 Redevelopment Plan* (A-2 Plan) area that overlaps with the Project Area include Residential, Medium Density (RM), Residential and Neighborhood Commercial (RN), Commercial, General Intermediate Density (CI), Institutional (I), and Public (P). A-2 Plan height controls within the Project Area include 50-X (X limits plan dimensions for heights of less than 65 feet on lateral slopes), 96-X, and 130-E (E limits plan dimensions above 65 feet)." [Q-1]The following text is added to Chapter 3, page 3-8, of the DEIR following the third paragraph to elaborate on the characteristics of the broader Plan:

"The Upper Market District, which extends from Van Ness Avenue west, is characterized by neighborhood commercial restaurants, bars, cafes, fitness studios, and a variety of retail establishments. The Castro District centered at Market and Castro Streets, is located on the western edge of the Project Area. Upper Market Street, near Castro Street, is characterized by three- to four-story commercial buildings with ground-floor retail uses including restaurants, shops, and fitness centers. Multi-story residential apartments and flats surround the commercial developments on Market, Church, and Castro Streets. West of Castro Street, the commercial uses mix with Victorian buildings along Market Street.

Duboce Triangle, in the western Project Area, north of Market Street, is bounded roughly by Waller Street to the north, Castro Street to the west, and Market Street to the south and east. This district is predominantly residential with interspersed neighborhood commercial uses and unique landscaping and traffic-calming measures." [AA-11]

SOURCE: EnviroTrans Solutions

Figure 3-1
Revised
Location Map

- The text in Chapter 3, page 3-9 of the DEIR, first bullet is revised to read as follows:

  "Elements Analyzed at a Program Level in this EIR – Plan elements analyzed at a program level in this EIR include land use and parking controls that involve recommended changes to the *Planning Code*, ~~and~~ *Zoning Map*, and *Western Addition A-2 Redevelopment Plan*, urban design guidelines, and modest public improvements;" [Q-1]

- The following text is added in Chapter 3, page 3-13 of the DEIR, following the fifth paragraph:

  "On Parcels B, D, E, F, and G, an A-2 Plan amendment enacted by the Redevelopment Agency would incorporate the goals of the NCT district design guidelines: increased housing density, modified height limits, and relaxed parking standards. The heights and the parking standards proposed by the Redevelopment Agency for these parcels would be consistent with the controls proposed by the Planning Department for the Plan. On all other parcels in the *Western Addition A-2 Redevelopment Plan* area that overlap with the Project Area, the existing A-2 Plan designations would remain in effect until 2009 when the A-2 Plan expires." [Q-1]

- The text in Chapter 3, page 3-16 of the DEIR, third paragraph, first sentence is amended to read as follows:

  "The proposed Plan would adjust heights along various commercial streets, increasing or decreasing heights by 5 to 10 feet to achieve a 45- to ~~50~~55- foot limit, ..." [P-5]

- The text in Chapter 3, page 3-16, of the DEIR third paragraph, fourth sentence is amended to read as follows:

  "Except for the areas around Market Street and Van Ness Avenue, where heights would increase to a maximum of 400 feet (an increase of 80 feet on some parcels), and Upper Market Street, where heights would increase by 15 feet to 65 feet, most of the heights in the rest of the Project Area would remain the same, decrease, or increase by about five feet." [AA-11]

- The text on Chapter 3, page 3-17, of the DEIR first paragraph, second sentence is amended to

read as follows:

"This potential would generally be smaller in existing residential districts, such as Duboce Triangle, the Castro, and Inner Mission, and more concentrated at the Van Ness Avenue/Market Street/Mission Street intersection, in the SoMa West area and extending out along major commercial streets such as Market and Mission Streets." [AA-11]

- The text in Chapter 3, page 3-19 of the DEIR, Table 3-4, is revised to read as follows:

Table 3-4, Revised :

Proposed Zoning for Central Freeway Parcels

Parcel[1]	Land Use District	Height District	Parking[2, 4]	Recommended Use
A, A-1[3]	NCT	85 feet	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
B	NCT	50 feet with a 5-foot retail bonus on the southern half of parcel	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
C[3]	NCT	120 feet along Franklin and Golden Gate; 50 feet (with a 5-foot retail bonus) on the western portion of the parcel ~~frontage~~	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
D	NCT	50 feet (with a 5-foot retail bonus) to 85 feet	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
E, E-st	NCT	50 feet with a 5-foot retail bonus on the northern half of parcel	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	E: Maximize housing; E-st: Reestablish public ROW connecting Ash Alley
F, G	NCT	F: 65 feet; G: 65 feet, 50 feet (with a 5-foot retail bonus) on triangular portion at south edge of parcel	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
H	NCT	40~~5~~-to 50 feet (with a	Not required; Maximum of 0.5	Maximize housing

Table 3-4, Revised :

Proposed Zoning for Central Freeway Parcels

Parcel[1]	Land Use District	Height District	Parking[2, 4]	Recommended Use
		5-foot retail bonus)	spaces/unit permitted, up to 0.75 spaces/unit conditional	
I	Hayes-Gough NCT	50 feet along Gough; 40~~5~~ feet (with a 5-foot retail bonus) along Grove; and 40 feet along Ivy	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing
J	Hayes-Gough NCT	45 feet/4 stories along Hayes; 30~~/40~~ feet along Ivy	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing above active ground-floor uses on Hayes
K	Hayes-Gough NCT	55 feet/5 stories on Octavia; 45 feet/4 stories on Hayes; 40 feet on Linden	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing above active ground-floor uses on Hayes and Octavia
L	Hayes-Gough NCT	55 feet/5 stories along Octavia~~; 30/40 feet along Linden~~	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing above active ground-floor uses
M, N, R, S	Hayes-Gough NCT	50 feet (with a 5-foot retail bonus)	Parking up to a maximum of 0.5 spaces/unit conditional	Housing if it can be accommodated or additions to existing buildings
O, P	Hayes-Gough NCT along Octavia and RTO elsewhere	50 feet along Fell and Oak~~ and Laguna~~; 55 feet along Octavia,; 40 feet interior of Parcel O and 30/40 feet interior of Parcel P both extending out to Laguna Street	Not required; In NCT maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional; in RTO maximum of 0.75 spaces/unit permitted, up to 1.0 spaces/unit conditional	Maximize housing with active uses along Octavia Boulevard
Q	Hayes-Gough NCT	50 feet (with a 5-foot retail bonus)	Not required; Maximum of 0.5 spaces/unit permitted, up to 0.75 spaces/unit conditional	Maximize housing above active ground-floor uses
T, U, V	NCT	50 feet (with a 5-foot retail bonus on Parcels T and U); 85 feet on southern half of Parcel V	Parking up to a maximum of 0.5 spaces/unit conditional	Maximize housing above active ground-floor uses

Source: San Francisco Planning Department, *The Market and Octavia Neighborhood Plan, Draft for Public Review*, December 2002

1 On Parcels A–G, the proposed new land use district of NCT would not take effect until expiration of the

Table 3-4, Revised :

Proposed Zoning for Central Freeway Parcels

Parcel[1]	Land Use District	Height District	Parking[2, 4]	Recommended Use

Western Addition A-2 Redevelopment Plan in 2009.

2 The proposed 8th Amendment to the A-2 Plan amendment would establish the same parking requirements on Parcels B, D, E, F, and G as proposed in the Plan, but a variance rather than a conditional use permit would be required to alter from the proposed parking regulations.

3 The 7th Amendment to the *Western Addition A-2 Redevelopment Plan* implemented in April 2005 for Parcels A and C was generally consistent with the goals of the *Market and Octavia Neighborhood Plan.* The height controls enacted on these parcels are 96-E/130-E, on the western and eastern portions of the parcels respectively, which exceeds the proposed Plan height limits of 85 feet on Parcel A and a mix of 50 to 120 feet on Parcel C. The specific development proposals for Parcels A and C, however, were consistent with the recommended Plan height designations. The parking requirement for Parcels A and C established in the 7th Amendment were 1 space for 5 units.

4 Dwelling units in the NCT and RTO Districts with at least two bedrooms and at least 1,000 square feet of occupied floor area would allow up to one parking space for each unit through a conditional use permit.

[Q-1]

- The following text is added in Chapter 3, page 3-22 of the DEIR, following the first paragraph:

"On Parcels B, D, E, F, and G, which fall under the *Western Addition A-2 Redevelopment Plan* requirements, the Redevelopment Agency proposes to enact an 8th Amendment to the A-2 Plan that would incorporate the goals of the NCT district design guidelines: increased housing density, modified height limits, and relaxed parking standards. The heights and the parking standards proposed by the Redevelopment Agency for these parcels would be consistent with the controls proposed by the Planning Department for the *Market and Octavia Neighbhorhood Plan.* On all other parcels in the *Western Addition A-2 Redevelopment Plan* area that overlap with the Project Area, the existing A-2 Plan designations would remain in effect until 2009 when the A-2 Plan expires. On these other parcels, heights currently range from 50 feet, primarily west of Gough Street, to 96 and 130 feet on some of the parcels east of Gough Street. " [Q-1]

- The text in Chapter 3, page 3-34 of the DEIR, third paragraph, fourth sentence is revised to read as follows:

"It will also provide project level environmental review for the Central Freeway parcels; the 8th Amendment to the *Western Addition A-2 Redevelopment Plan* regarding

building height, density, and parking controls for Central Freeway parcels B, D, E, F, and G; and specific public street and open space improvements as previously noted." [Q-1]

- The following text is added in Chapter 3, page 3-34 of the DEIR, as the fifth bullet at the bottom of the page:

  - "*Western Addition A-2 Redevelopment Plan* amendments." [Q-1]

- The following text is added in Chapter 3, page 3-36 of the DEIR, at the end of the first paragraph:

  "As a separate action, the Redevelopment Agency would pursue an 8th Amendment to the *Western Addition A-2 Redevelopment Plan* to implement the housing density, modified heights, and parking goals of the *Market and Octavia Neighborhood Plan* on Parcels B, D, E, F, and G. Final adoption of this A-2 Plan amendment would require approval by the San Francisco Redevelopment Commission, the Planning Commission, and the Board of Supervisors. After the expiration of the A-2 Plan in 2009, the provisions of the *Market and Octavia Neighborhood Plan* would govern development on parcels that currently overlap with the Plan Project Area." [Q-1]

- The following text is added in Chapter 3, page 3-36 of the DEIR, as the final bullet under the Planning Commission listing:

  "Approves changes to the *Western Addition A-2 Redevelopment Plan* as recommended by the Redevelopment Commission." [Q-1]

- The following text is added in Chapter 3, page 3-36 of the DEIR, as the final bullet under the Board of Supervisors listing:

  "Approves changes to the *Western Addition A-2 Redevelopment Plan* as recommended by the Redevelopment Commission." [Q-1]

- The following text is added in Chapter 3, page 3-37 of the DEIR, before the Department of Public Works listing:

"San Francisco Redevelopment Commission

- Approves changes to the Western Addition A-2 Redevelopment Plan." [Q-1]

- The text in Chapter 3, page 3-37 of the DEIR, last paragraph, is revised to read as follows:

"The *Western Addition A-2 Redevelopment Plan* will expire in 2009. ~~No amendments to the Redevelopment Plan are proposed at this time in conjunction with the adoption of the *Market and Octavia Neighborhood Plan.* The provisions of the Redevelopment Plan will take precedence over the provisions of the *Market and Octavia Neighborhood Plan* until 2009 when the Redevelopment Plan expires.~~ In 2005, the San Francisco Board of Supervisors approved a 7th Amendment to the A-2 Plan, which brought the land use controls for Central Freeway Parcels A and C into general conformance with the *Market and Octavia Neighborhood Plan.* As part of the 7th Amendment, the height limits for these two parcels were modified to 96 feet on the western portion of the parcels and 130 feet on the eastern portion of the parcels, which is higher than the Plan recommended heights of 85 feet for Parcel A and range of heights from 50 to 120 feet for Parcel C. The approved development height for Parcel A and the pending development height limit for Parcel C, however, are 85 feet, which is consistent with the recommendations of the Plan for these parcels.

The Redevelopment Agency plans to implement an 8th Amendment to the A-2 Plan to bring the land use controls for Central Freeway parcels B, D, E, F, and G into general conformance with the *Market and Octavia Neighborhood Plan* as well. The 8th Amendment to the A-2 Plan is the only amendment the Redevelopment Agency anticipates with respect to the Project Area prior to the expiration of the A-2 Plan in 2009, so any parcels that are not Central Freeway parcels, but that lie within both the *Western Addition A-2 Redevelopment Plan* and the *Market and Octavia Neighborhood Plan* boundaries would be subject to the existing A-2 Plan controls rather than the proposed Plan controls until January 2009. At that time, the provisions of the *Market and Octavia Neighborhood Plan* will govern development in the former *Western Addition A-2 Redevelopment Plan* ~~expires~~ area. This EIR analyzes the impacts of the proposed 8th Amendment to the A-2 Plan, as well as, the application of the *Market*

and Octavia Neighborhood Plan to the *Western Addition A-2 Redevelopment Plan* area once that transition occurs." [Q-2]

- The text in Chapter 4, page 4-5 of the DEIR second paragraph is revised as follows:

"The Environmental Protection Element of the General Plan addresses the impact of urbanization including the use of oil and gas resources, hazardous waste management, ~~and~~ transportation noise, and energy use on the natural environment. The following noise and energy consumption-related objectives and policies of the Environmental Protection Element are relevant to the Project Area and the redevelopment of the Central Freeway parcels and the proposed public street improvements. The Plan's fundamental goal of developing the Project Area into a mixed–use, dense urban neighborhood that encourages complementary, pedestrian-scale uses would increase transportation efficiency and encourage land use patterns that use less energy." [R-2]

- The following text is added in Chapter 4, page 4-6 of the DEIR immediately before the first paragraph:

"**Objective 15:** Increase the energy efficiency of transportation and encourage land use patterns and methods of transportation which use less energy.

Policy 15.1: Increase the use of transportation alternatives to the car.

Policy 15.3: Encourage an urban design pattern that will minimize travel requirements among working, shopping, recreation, school and childcare areas.

Policy 15.5: Encourage consideration of energy use issues when making transportation investment decisions.

Policy 15.6: Promote alternative work arrangements which will contribute to more efficient transportation rules." [R-2]

- The text in Chapter 4, page 4-6 of the DEIR first paragraph is revised as follows:

"The *Market Octavia Neighborhood Plan* promotes infill development in an established

neighborhood that has benefited from the removal of an elevated regional freeway and has a high level of transit accessibility. By returning regional traffic to a surface level and promoting pedestrian, bicycle, and public transit as a means of traveling within the neighborhood, the Plan is generally consistent with ~~the noise~~ policies of the Environmental Protection Element relating to noise and energy efficient transportation alternatives. The Plan does not have specific policies relating to the location of sensitive land uses away from traffic generated noise, however, the noise levels in the Project Area are comparable to those experienced in other highly urbanized areas. New construction would be required to meet existing standards for noise attenuation. The primary objectives of the Plan are focused on development of a transit-oriented neighborhood that is consistent with the policies of the Environmental Protection Element that advocate land use and transportation investments that promote energy efficiency and the use of transportation alternatives." [R-2]

- The text in Chapter 4, page 4-16 of the DEIR, third paragraph is deleted and the text in Chapter 4, page 4-16, second paragraph is revised to read as follows:

"In addition, there are many ~~long-term~~ transportation ~~projects~~ improvements identified in the *Draft Market and Octavia Neighborhood Plan* that would address policies outlined in the Transportation Element of the *General Plan*~~, which include improving traffic and transit flows through signalization, widening sidewalks, long-term transit investments on Van Ness Avenue, or providing for bicycle parking at major transit terminals, to a greater degree than can be accomplished through the program and project level improvements that are evaluated in this EIR~~. Policies to more effectively manage parking, code revisions to reduce parking requirements, and projects that include: widening sidewalks to provide more pedestrian space and minimize street crossing distances for pedestrians; creating "living streets" on alleys in the Project Area; eliminating bicyclist hazards on streets by providing exclusive lanes for bicyclists; and providing for bicycle parking as part of major developments are analyzed in this DEIR at a program or project level. Long-term transportation improvements, such as improving traffic and transit flows through signalization, restriping, and contra-flow transit lanes; dedicated transit lanes on streets such as Van Ness and South Van Ness Avenues and Market Street; redirecting traffic flows

off transit streets; establishing parking impact fees; use of traffic control measures to improve the flow of bicycles on streets; preferential treatment for bicycles on Market and Page Streets; providing for bicycle parking at transit stations; and specific pedestrian improvements are not analyzed in this DEIR. These proposed long-term improvements, identified in Appendix 9-B, Table B-2, page 9.B-15, would further the consistency of the *Market and Octavia Neighborhood Plan* with the *General Plan*, but would be subject to independent environmental review."

~~There are no policies or improvements proposed in the Plan that would specifically address minimizing the street-crossing distance by pedestrians, eliminating bicyclist hazards on streets, or accommodating bicycles in the traffic control facilities as called for in the Transportation Element.~~ [M-16]

- The following text is added in Chapter 4, page 4-16 of the DEIR following the fourth paragraph:

"SEC. 16.102. TRANSIT-FIRST POLICY.
The following principles shall constitute the City and County's transit-first policy and shall be incorporated into the General Plan of the City and County. All officers, boards, commissions, and departments shall implement these principles in conducting the City and County's affairs:

1. To ensure quality of life and economic health in San Francisco, the primary objective of the transportation system must be the safe and efficient movement of people and goods.

2. Public transit, including taxis and vanpools, is an economically and environmentally sound alternative to transportation by individual automobiles. Within San Francisco, travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile.

3. Decisions regarding the use of limited public street and sidewalk space shall encourage the use of public rights of way by pedestrians, bicyclists, and public transit, and shall strive to reduce traffic and improve public health and safety.

4. Transit priority improvements, such as designated transit lanes and streets and improved signalization, shall be made to expedite the movement of public transit vehicles (including taxis and vanpools) and to improve pedestrian safety.

5. Pedestrian areas shall be enhanced wherever possible to improve the safety and comfort of pedestrians and to encourage travel by foot.

6. Bicycling shall be promoted by encouraging safe streets for riding, convenient access to transit, bicycle lanes, and secure bicycle parking.

7. Parking policies for areas well served by public transit shall be designed to encourage travel by public transit and alternative transportation.

8. New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.

9. The ability of the City and County to reduce traffic congestion depends on the adequacy of regional public transportation. The City and County shall promote the use of regional mass transit and the continued development of an integrated, reliable, regional public transportation system.

10. The City and County shall encourage innovative solutions to meet public transportation needs wherever possible and where the provision of such service will not adversely affect the service provided by the Municipal Railway. (Added November 1999)."

The provisions of the Plan are consistent with the Transit-First Policy in that they advocate for the creation of a transit-oriented Market and Octavia neighborhood through land use controls, parking regulation, traffic management, and giving preference to pedestrians, transit, and bicycle travel in the Project Area." [R-2]

- Text in Chapter 4, page 4-18 of the DEIR, is revised to add the following language as a new subsection immediately preceding the Downtown Area Plan subsection:

"Arts Element

The Arts Element of the *General Plan* is intended to strengthen the arts in San Francisco, as an expression of culture, creativity and beauty, and to provide guiding principles for the City in its dealings with the arts community. The arts are recognized as a major economic force in the region and the adoption of formal policies to enhance the arts, legitimizes their economic role and is intended to insure the future health and vitality of the arts in San Francisco. The Arts Element contains the following objectives and policies relevant to the Plan.

Objective I-2: Increase the contribution of the arts to the economy of San Francisco.

Policy I-2.1: Encourage and promote opportunities for the arts and artists to contribute to the economic development of San Francisco.

Policy I-2.2: Continue to support and increase the promotion of the arts and arts activities throughout the City for the benefit of visitors, tourists, and residents.

Objective III-1: Enhance the contribution of artists to the creative life and vitality of San Francisco.

Policy III-1.5: Include the participation of artists in City capital improvements and public works projects which do not fall under current Percent for Art programs.

Objective III-2: Strengthen the contribution of arts organizations to the creative life and vitality of San Francisco.

Policy III-2.2: Assist in the improvement of arts organizations' facilities and access in order to enhance the quality and quantity of arts offerings.

Policy III-2.3: Recognize that arts organizations are representative of the City's diversity, creativity and vitality.

Objective VI-1: Support the continued development and preservation of artists'

and arts organizations' spaces.

Policy VI-1.3: Increase the use of City owned neighborhood facilities for the arts.

Policy VI-1.4: Preserve existing performing spaces in San Francisco.

Policy VI-1.8: Include arts spaces in new public construction when appropriate.

Policy VI-1.9: Create opportunities for private developers to include arts spaces in private developments city-wide.

One of the basic frameworks of the Plan is to "enhance the cluster of cultural uses in the Civic Center (see page 15 of the Plan)." The Plan proposes to encourage the neighborhood-oriented businesses that currently thrive in the area around Hayes and Gough Streets and to support these uses through the introduction of new residential uses. Cultural, arts, and institutional issues would be allowed in all of the proposed zoning districts under the Plan. The DTR district would permit such uses up to the fourth floor of a building; the NCT zone would permit such uses on the first two floors and as a conditional use on upper floors; there would be no change of uses in the named NCT districts; and cultural, arts, and institutional uses would be a conditional use in the RTO district.

As part of the Street and Open Space Element, the Plan calls for the inclusion of public art projects and programs in the design of streets and public spaces, consistent with the Arts Element." [A-10]

- Text in Chapter 4, page 4-18 of the DEIR, is revised to add the following language as a new subsection immediately preceding the Downtown Area Plan subsection and following the proposed text addition related to the Arts Element noted in Response A-10 above:

"Civic Center Plan

The purpose of the Civic Center Plan is to guide development in the Civic Center area, rather than to identify specific locations for specific uses. There are four broad activity categories of public uses that are to be considered in the Civic Center area;

three of which are located within the Project Area: administrative, entertainment/cultural, and parking.

Objective 1: Maintain and reinforce the Civic Center as the symbolic and ceremonial focus of community government and culture.

Policy 1.1: Emphasize key public buildings, particularly City Hall, through visually prominent siting.

Policy 1.4: Provide a sense of identity and cohesiveness through unifying street and Plaza design treatments.

Objective 2: Develop the Civic Center as a cohesive area for the administrative functions of city, state and federal government, and as a focal point for cultural, ceremonial, and community activities.

Policy 2.2: Locate civic cultural facilities in the Civic Center.

Policy 2.3: Encourage governmental activities of each level of government to locate within a "sphere of influence" within the Civic Center to avoid inefficient dispersal of these activities throughout the area.

Policy 2.4: Encourage administrative-oriented governmental functions (executive, legislative, and judicial) to locate in new consolidated facilities rather than being dispersed throughout the adjacent area in leased or rented quarters.

Objective 3: Provide convenient access to and circulation within the Civic Center, and support facilities and services.

Policy 3.1: Locate buildings employing large numbers of employees and/or attracting large numbers of visitors in convenient pedestrian proximity to public transit and off-street parking facilities.

Policy 3.2: Locate parking facilities beyond the western periphery of the Civic Center core, with direct vehicular access to major thoroughfares.

Policy 3.3: Provide and price parking for short-term visitor use, and discourage long-term parking. Encourage transit use as the primary means of access to the Civic Center.

Policy 3.4: Encourage privately-operated support and personal service establishments to locate within the Civic Center area.

Objective 4: Protect and enhance the housing resources in the Civic Center Area.

Policy 4.1: Conserve and upgrade existing low and moderate income housing stock.

Policy 4.2: Encourage new infill housing at a compatible density.

As noted above, the Plan calls for "enhancing the cluster of cultural uses in the Civic Center," a policy that is consistent with Objectives 1 and 2 and the guiding policies of the Civic Center Plan. These uses could be expanded in the Civic Center Area on properties within the Project Area that are zoned for public use and up to the fourth floor on parcels with DTR zoning. Both the Civic Center Plan and the *Market and Octavia Neighborhood Plan* also recommend the preservation and enhancement of public street space, open space areas, and housing resources. A combination of public uses and housing could be developed on the parcels that are located within the four blocks where the two plan areas overlap.

The Civic Center Plan, like the *Market and Octavia Neighborhood Plan* calls for an emphasis on access to public transit for employees and provision of short-term parking for visitors to the Civic Center Plan area. The Civic Center Plan further calls for locating parking facilities that serve the Civic Center core beyond its western periphery in the area that has direct vehicular access to major thoroughfares. This western periphery of the Civic Center area is in the *Market and Octavia Neighborhood Plan* Project Area. The Plan calls for more effective management of parking in the Project Area and those adjacent parking facilities that serve the cultural institutions in the Civic Center, through parking rates adjustments and use of other tools, to better utilize existing parking capacity and to increase the sense of security at public garages. The *Draft Market and Octavia Neighborhood Plan* strongly discourages the construction of new parking structures in the Project Area and recommends that access via transit be emphasized instead. However, the expansion

of existing or the construction of new parking facilities may be allowed through a Conditional Use Permit if parking demand is not satisfied after trip reduction and transportation demand management strategies have been attempted, alternative modes encouraged, and use of existing parking facilities is being maximized. Parking revenue from the new facility would need to cover its cost in accordance with Proposition E." [A-11]

- The text in Chapter 4, page 4-25 of the DEIR, first paragraph, starting at the fourth sentence, is revised to read as follows:

"~~The Redevelopment Plan focuses primarily on housing, and provides for the development of 5,490 new housing units and the rehabilitation of over 3,965 housing units. Approximately 5,270 of the new units have been constructed and the housing rehabilitation program is complete. The Redevelopment Plan also provides for revitalization of the Japantown (Nihonmachi) and Fillmore commercial districts and the provision of new community recreational and cultural facilities which are on-going. The Redevelopment Plan was amended in 1994 to allow construction of higher density senior housing on northernmost Central Freeway parcels (Parcels A and C) in the Project Area, create more consistent height districts after demolition of the Central Freeway, and provide for other changes to the Redevelopment Plan.~~ The emphasis of the original *Western Addition A-2 Redevelopment Plan* was the development of new housing for low- and moderate-income households, and the A-2 Plan set forth as its goal the construction of approximately 5,500 new units and 4,000 rehabilitated units. The goal of the Agency's final *Western Addition A-2 Implementation Plan (2004-2009)*, calls for a total housing production target of 10,267 units. Since the original adoption of the A-2 Plan in 1964, the Redevelopment Agency has amended the *Western Addition A-2 Plan* seven times, with the 7th Amendment's adoption finalized in April 2005. One of the 7th Amendment's purposes was to modify the density and parking controls for Central Freeway parcels A and C, pursuant to the goals of the *Market and Octavia Neighborhood Plan*. The 7th Amendment also regularized the height districts for Parcels A and C, which had formerly been bisected by the Central Freeway." [Q-3]

- The text in Chapter 4, page 4-25 of the DEIR, second paragraph, starting with third sentence, is

revised to read as follows:

"...The Redevelopment Agency has determined that they will ~~not amend the *Western Addition A-2 Redevelopment Plan* to be consistent with the *Market Octavia Neighborhood Plan* in the interim. If there is a proposal for development in the Western Addition A-2 Plan area before 2009, the proposal would be subject to the policies and regulations established by the *Western Addition A-2 Redevelopment Plan* and environmental review would be required as determined necessary under provisions of the Redevelopment Plan.~~ pursue an 8th Amendment to the A-2 Plan to implement the housing density. modified heights, and parking goals of the Plan for the Central Freeway parcels, B, D, E, F, and G, which lie within both the *Western Addition A-2 Redevelopment Plan* area and the Project Area. These are the Central Freeway parcels that were not included in the 7th Amendment for Parcels A and C. [Q-3]

- The text in Chapter 4, page 4-25 of the DEIR, third paragraph, is deleted and replaced with the following:

~~"The density and parking standards in the *Western Addition A-2 Redevelopment Plan* are more restrictive than those proposed in the *Market Octavia Neighborhood Plan*. Project Area parcels within the Western Addition A-2 Redevelopment Plan area are zoned either RM, Residential Medium Density, or CI, Commercial, General, Intermediate Density. These zones permit residential development of one unit per 200 square feet and 100 square feet of lot area respectively. Parking of one space per residential unit would be required in these zones, with an allowable reduction in parking to one space per two residential units, for units designed for elderly or disabled occupants. In contrast, the Plan would eliminate residential density controls and minimum parking requirements.~~

For Parcels B, D, E, F, and G, the new parking controls proposed in the 8th Amendment would be as follows: parking is not required, but up to 0.5 spaces per unit would be allowed. The parking spaces provided could increase to 0.75 spaces per unit through a variance request. No commercial parking would be required.

The *Western Addition A-2 Neighborhood Plan* uses the term "Agency Rooms" as a unit

of measurement.[1] Parcels B, D, E, F, and G are within a CI district, which limits density to one Agency Room per 100 square feet of lot area. For all five parcels, the Agency is proposing to achieve the goals of the *Market and Octavia Neighborhood Plan* by eliminating the CI density restrictions through an 8th Amendment to A-2 Plan.

The 7th Amendment to the A-2 Plan modified the heights for Parcels A and C by applying an existing 96-foot height limit designation to the western portions of those parcels that were previously capped at 50 feet, providing a new height limit split of 96/130 feet. For Parcel B, the Redevelopment Agency proposes to modify the height control to 50-X. For Parcel D, the proposed height would be 50-X to 85-E. For Parcel E, the existing 50-X height limit would be extended to the entire site. Parcels F and G would require a new height designation, in keeping with the *Market and Octavia Neighborhood Plan* and acknowledging both their special locations, which frame City Hall, and their ability to support ground floor retail. The proposed heights for these sites would be 65 feet." [Q-3]

- The text in Chapter 4, page 4-35 of the DEIR, last paragraph, third sentence is revised and additional text is added to read as follows:

"Land uses along Franklin Street include ~~non-profit and public agencies such as the San Francisco Bar Association,~~ the San Francisco Ballet Association, the State Department of Employment Development, and offices of the San Francisco Unified School District. The New Conservatory Theater has two performance spaces located at 25 Van Ness Avenue. The National Center for International Schools, including the French and Chinese American International Schools, is located at 150 Oak Street between Franklin and Gough Streets and the San Francisco Girls Chorus and School is located at 44 Page Street between Franklin and Gough Streets. The Progress Foundation, which provides treatment for mentally disabled individuals is located at 368 Fell Street at Octavia Street." [A-13]

- Figure 4-2, page 4-38 of the DEIR is revised to show the *Western Addition A-2 Redevelopment Plan*

[1] All residential densities in the A-2 Plan are expressed in terms of Agency Rooms, rather than units. The A-2 Plan defines an Agency Room as including a living room, dining room, kitchen, family room, study, den, library, bedroom or similar major room, but not including bathrooms, closets, hallways, or similar rooms. By practice, a studio is considered two Agency Rooms, while a one-bedroom apartment is considered three Agency Rooms.

Use Districts. See Figure 4-2 on the following page.

- The following text is added in Chapter 4, page 4-39 of the DEIR, after the third paragraph:

  "In addition to the 17 zoning districts described above, the Plan area between Turk and Fulton, Franklin and Laguna overlaps with the *Western Addition A-2 Redevelopment Plan* area. Land use controls within the A-2 Plan area include Residential, Medium Density (RM), Residential and Neighborhood Commercial (RN), Institutional (I), and Commercial, General Intermediate Density (CI). RM districts allow one Agency Room per 200 square feel of lot area. CI districts allow one Agency Room per 100 square feet of lot area. RN districts east of Laguna Street allow one Agency Room per 100 square feet of lot area. Parcels A and C, subsequent to the A-2 Plan 7th Amendment, may be developed with a density of one Agency Room per 50 square feet of lot area." [Q-1]

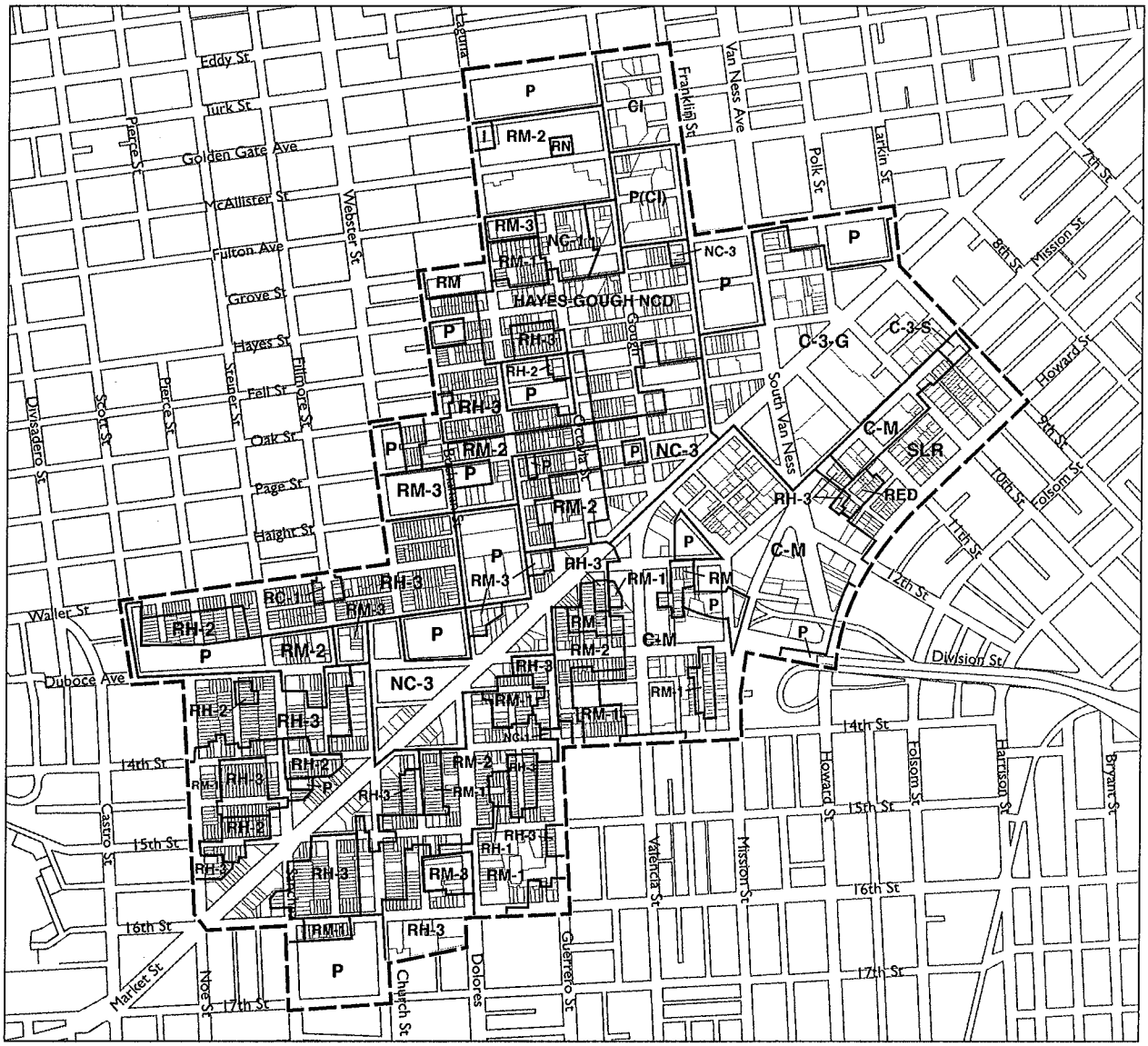
- Figure 4-3, page 4-40 of the DEIR is revised to update to show the Western Addition A-2 Redevelopment Plan existing height districts. See revised Figure 4-3 on the following page.

- The following text is added in Chapter 4, page 4-41 of the DEIR, after the second paragraph:

  "In the *Western Addition A-2 Redevelopment Plan* area the height and bulk districts range from 50-X to 130-E. The X bulk district limits plan dimensions at heights of less than 65 feet on lateral slopes and the E bulk district limits plan dimensions above 65 feet." [Q-1]

- The text in Chapter 4, page 4-41 of the DEIR, fourth paragraph, fifth sentence, is revised to read as follows:

  "Parcels A ~~to~~ through G are subject to the *Western Addition A-2 Redevelopment Plan*, which allows for a range of density between one Agency Room per 50 square feet of



Project Boundary

Residential Districts

- **RH-1** Residential One-Family
- **RH-2** Residential Two-Family
- **RH-3** Residential Three-Family
- **RM-1** Residential Low Density
- **RM-2** Residential Moderate Density
- **RM-3** Residential Medium Density

Neighborhood Commercial Districts

- **NC-1** Neighborhood Commercial Cluster
- **NC-3** Moderate-Scale Neighborhood Commercial

Designated Neighborhood Commercial Districts (NCD)

- Hayes-Gough NCD
- Upper Market NCD
- Valencia Street NCD

Downtown Commercial Districts

- **C-3-G** Downtown General Commercial
- **C-3-S** Downtown Support
- **C-M** Heavy Commercial

Public

- **P** Public

South of Market Districts

- **RED** Residential Enclave Districts
- **SLR** Service/Light Industrial/Residential Mixed Use District

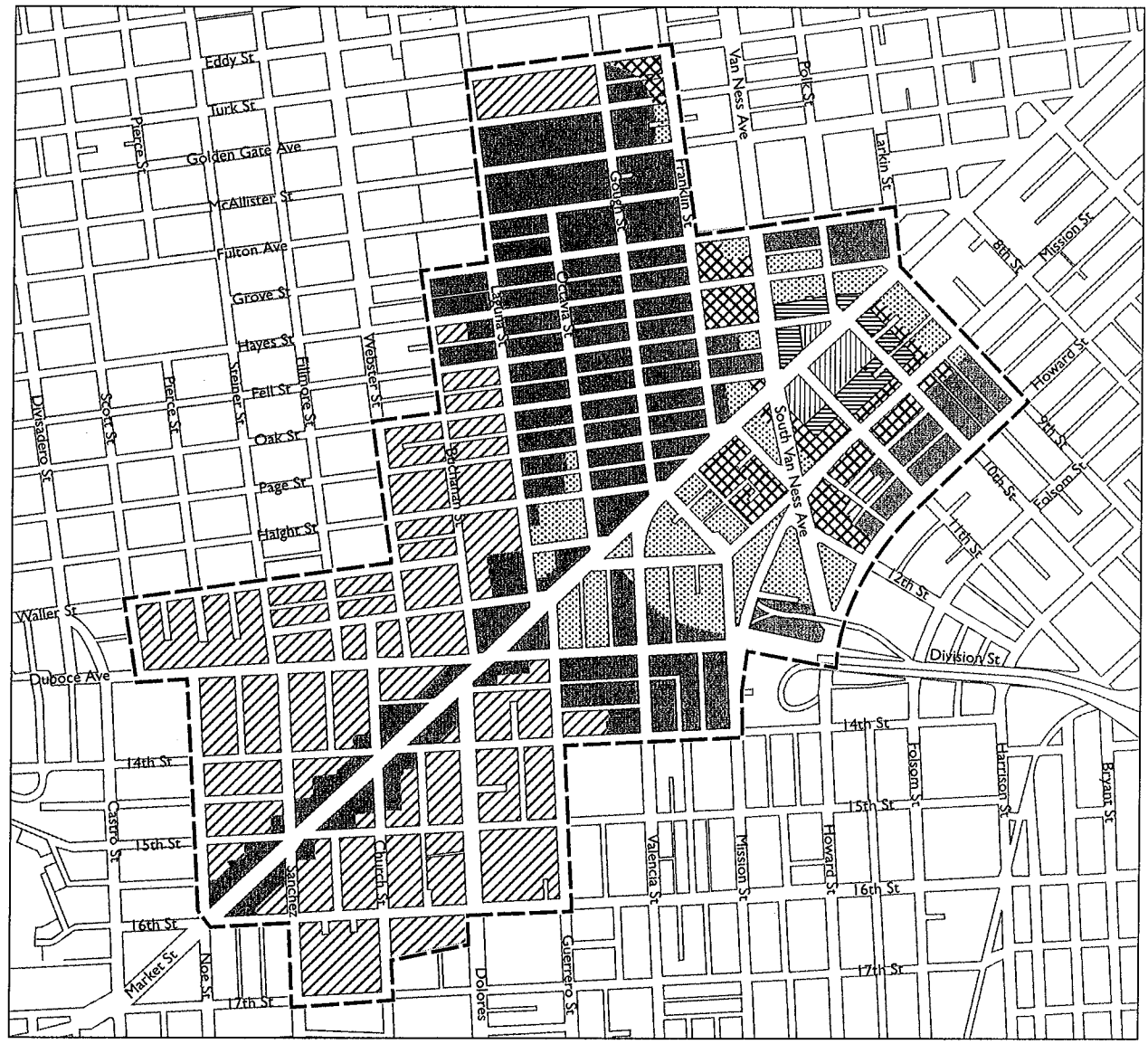
Western Addition A-2 Plan Districts

- **RM** Residential, Medium Density
- **RN** Residential and Neighborhood Commercial
- **I** Institutional
- **CI** Commercial, General Intermediate Density
- **P** Public

0 1000 FEET

SOURCE: EnviroTrans Solutions, San Francisco Planning Department

Figure 4-2
Revised
Existing Use Districts



SOURCE: EnviroTrans Solutions, San Francisco Planning Department

Figure 4-3
Revised
Existing Generalized Height Districts

lot area (Parcels A and C) to one Agency Room per 100 square feet of lot area (Parcels B, D, E, F, and G). Parcel H is ~~are~~ located within the Neighborhood Commercial District (NC-3), which allows ground-floor retail uses and residential units above the first floor at a density of one bedroom per 210 square feet of lot area." [Q-4]

- The text in Chapter 4, page 4-41 of the DEIR, fourth paragraph, last sentence, is revised to read as follows:

"~~Parcels A, B and D are designated with a split 50-X and 130-E height and bulk district (E restricts bulk above 40 feet); Parcel C with a 130-E; Parcels E and G with a 65-A (bulk restrictions above 40 feet); Parcel F split with a 50-X and 65-A;~~ Parcels A and C are designated with a 96-E/130-E height and bulk district (E restricts the bulk over 65 feet); Parcels B and D with a split 50-X and 130-E height and bulk limit (X restricts the bulk under 65 feet on parcels with lateral slopes); Parcels E and F with a split 50-X/96-X height and bulk limit; and Parcel G with a 96-X height limit within the A-2 Plan area. Outside of the A-2 Plan area, Parcels H to N and R to U are designated with a 50-X height and bulk limit; Parcels O, P, and Q with an 80-B height and bulk limit (bulk restrictions above 50 feet); and Parcel V with an 80-A height and bulk limit." [Q-4]

- The text in Chapter 4, page 4-47 of the DEIR, first paragraph, starting at the first complete sentence is revised to read as follows:

"Height limits would drop from about 50 and 80 feet to between 40 ~~to 50~~ and 55 feet in Hayes Valley. ~~The portion of the Upper Market NCD contained within the Project Area would drop current height limits of between 65 to 80 feet to a 50-foot height limit. The Valencia NCD would continue with a 50-foot height limit along Valencia Street, but would lower height limits to 30 and 40 feet at mid-block alleys.~~ The height limits in the portion of the Upper Market NCD contained within the Project Area would increase from the existing 50- to 80-foot heights to 65- to 85-foot heights. Heights in the NC-3 district along Valencia Street would be increased from 50 to 55 feet (50 feet with a 5-foot retail bonus), but would be reduced to 30 to 40 feet on mid-block alleys." [P-2]

- Figure 4-4, page 4-52 of the DEIR is revised to show the height changes proposed on the block bounded by Market Street, South Van Ness Avenue, and Twelfth Street. See revised Figure 4-4 on the following page. [O-1]
- The following text in Chapter 4, page 4-54 of the DEIR, second paragraph, third sentence, is revised to read as follows:

> "The Redevelopment Agency and the Mayor's Office estimates that 800 to 900 new housing units could be developed on the Central Freeway parcels, of which 50 percent would be affordable." [Q-1]

- The following text is added in Chapter 4, page 4-54 of the DEIR, at the end of the fifth paragraph:

> "Neither would the Redevelopment agency's proposed amendment, which would align the *Western Addition A-2 Redevelopment Plan's* parking, density, and height limits with the Plan, in pursuit of the goals of the Plan, have an adverse impact on the environment." [Q-1]

- The text in Chapter 4, page 4-55 of the DEIR, starting at the second sentence of the second paragraph and continuing through the first paragraph of page 4-56 is deleted and is replaced with the following text:

> "...~~Parcel A would be designated as NCT with an 85-foot height limit compared to the existing split 50-foot/130-foot limit. Development of this parcel would be subject to Section 295 of the Planning Code (Proposition K), which limits new shadows cast on open spaces owned by the Recreation and Park Department. The amount of development that can be accommodated on this site would be constrained by building height and shadow effects on adjacent public parks. Development of this parcel would introduce new housing and ground-floor retail, and provide a transition from commercial development to the east to the mostly residential uses west of Gough Street. Anticipated development on this parcel would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the project vicinity.~~

SOURCE: EnviroTrans Solutions, San Francisco Planning Department

Figure 4-4
Revised
Proposed Generalized Height Districts

~~Parcel B would be developed into housing with ground-floor retail similar to existing surrounding uses. Parcel B would be designated as NCT with a 50-foot height limit compared to the existing split 50-foot/130-foot height limit. Located on Golden Gate Avenue, Parcel B development would incorporate housing with ground-floor active retail and pedestrian-oriented uses. Parking and loading access would be from Elm Street; no curb cuts would be permitted along Golden Gate Avenue. Due to the narrow width of the alley, loading activities could conflict with residential uses; however, anticipated development on this parcel would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the vicinity.~~

~~Parcel C is on the southwest corner of the Franklin Street and Golden Gate Avenue intersection, across from the State Building and diagonally across from Opera Plaza mixed-use complex. Parcel C would be designated as NCT with a 120-foot height limit compared to the existing 130-foot height limit. The Plan calls for maximizing housing on this parcel with active ground-floor neighborhood-serving retail. Proposed development would not affect the existing land use character of the surrounding area and would not divide or disrupt established patterns of development as it would be similar in character to existing uses in the vicinity.~~

~~Parcel D is on the north side of McAllister Street west of Franklin Street. It is irregularly shaped, and is surrounded by other irregularly shaped lots, which are currently leased for parking. Parcel D would be designated as NCT and would be developed as housing with the potential for ground-floor retail with a 50-85 foot height limit compared to the existing 130-foot height limit. Optimal development potential for this parcel as proposed by the Plan would require that Parcel D and surrounding lots be subdivided into parcel sizes and shapes more favorable for development. Development of this parcel would need to be compatible with the John Swett Elementary School and playground which abut Parcel D to the west. Development of this parcel would require further land assembly actions to normalize lot sizes and shapes before development could be realistically achieved. Based on development guidelines, anticipated development on this parcel would be compatible with the adjacent school and commercial uses, and would not disrupt or divide an established community or have a substantial adverse impact on the existing character~~

~~of the vicinity.~~

Parcel A was the subject of the 7th Amendment to the A-2 Plan, which designated its height limit at 96-E/130-E, reduced its allowable parking to one space per five housing units, and increased its density to one Agency Room per 50 square feet of lot area. A development program for Parcel A, designed pursuant to the A-2 Plan 7th Amendment, was approved by the Planning Commission as confirming to the requirements of Proposition K (Section 295 of the Planning Code). Total building height for the development will be restricted to 85 feet. This development will introduce new housing and ground-floor retail, providing a transition from commercial development on the east to the mostly residential uses west of Gough Street. The same land use controls applicable to Parcel A, through the 7th Amendment to the A-2 Plan, also apply to Parcel C. For Parcel C, however, there are no potentially adverse shadow impacts as the site is not located in close proximity to any recreational areas. Following the expiration of the A-2 Plan in 2009, Parcels A and C would be designated as NCT; with an 85-foot height limit on Parcel A and a 150-foot height limit on Parcel C. Development on these parcels would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the project vicinity.

The Redevelopment Agency plans to adopt an 8th Amendment to the A-2 Plan that would modify height, density, and parking controls for the remaining Central Freeway parcels (Parcels B, D, E, F, and G) within the *Western Addition A-2 Redevelopment Plan* area in order to implement the goals of the *Market and Octavia Neighborhood Plan*. Parcel B's height designation would become 50-X. Parcel D's height limit would be set at 50X/85-E. Parcel E would be designated with a 50-X height limit. Parcels F and G would have height limits of 65-X. Parking on all of the parcels would be modified so that up to one space per 0.5 units would be allowed; with one space per 0.75 spaces allowed through a variance. No density restrictions would apply. Instead, unit count would be determined by allowable building form.

Parcel B, located on Golden Gate Avenue, would incorporate housing with active ground-floor retail and pedestrian-oriented uses. Development of this parcel would be compatible with the John Swett Elementary School and playground, which are

directly across Golden Gate Avenue from Parcel B. Parking and loading access would be from Elm Street; no curb cuts would be permitted along Golden Gate Avenue. Due to the narrow width of the alley, loading activities could conflict with residential uses. Following the expiration of the A-2 Plan in 2009, Parcel B would be designated as NCT with a 50-foot height limit. Anticipated development on this parcel would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the vicinity.

Parcel D is on the north side of McAllister Street west of Franklin Street. It has been assembled with the adjacent parcel to the south, and the whole site is leased for parking. Development of this parcel would be compatible with the John Swett Elementary School and playground, which abut Parcel D to the west. Based on development guidelines, anticipated development on this parcel would be compatible with the adjacent school and commercial uses, and would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the vicinity. Following the expiration of the A-2 Plan in 2009, Parcel D would be designated as NCT and could be developed as housing with the potential for ground-floor retail with a 50- to 85-foot height limit. [Q-5]

- The text in Chapter 4, page 4-56 of the DEIR, second paragraph, is revised to read as follows:

  "Parcels E and E-st are located midblock on McAllister Street between Gough and Franklin Streets; Parcel E-st is a portion of the Ash Street right-of-way which has been abandoned. ~~Parcel E would be designated as NCT.~~ Surrounding land uses are a mixture of apartment buildings, including Ash Park on McAllister Street, small-scale commercial buildings, and several larger structures fronting Franklin Street including the American Bar Association. Currently the height limit on the site is 50 feet on the west and 96 feet on the east. The 8th Amendment to the A-2 Plan would extend the 50-foot height limit to govern the whole site. Following the expiration of the A-2 Plan in 2009, Parcel E would be designated as NCT. Building height limits would ~~decrease from 65 to~~ remain at 50 feet…." [Q-6]

- The text in Chapter 4, page 4-56 and 4-57 of the DEIR, third paragraph, is revised to read as follows:

"Parcels F and G are located at the northeast and southeast corners of the intersection of Fulton and Gough Streets. Surrounding land uses are a mix of small-scaled residential uses and commercial uses, and larger scale buildings such as the Performing Arts garage on Grove Street. Because of their relationship to and dramatic views of City Hall to the west, the Plan recommends that these sites be developed with a coordinated architectural approach. ~~Both of these sites are zoned NCT. Parcel F has an existing split 50-foot/65-foot height limit and Parcel G has an existing 65-foot height limit. The Plan calls for keeping the NCT designation and keeping these sites to a 65-foot height limit, except for a triangular portion at the south edge of the Parcel G with a 50-foot height limit. Development of these parcels would establish residential uses that would provide a transition to residential uses to the west.~~ Like the other Central Freeway parcels within the A-2 Plan area, both of these sites are zoned CI, with a 50/96-foot height limit for Parcel F and a 96-foot height limit for Parcel G. In recognition of the site's proximity to City Hall, the Redevelopment Agency's pending A-2 Plan 8th Amendment would change the height limits to 65 feet as called for in the *Market and Octavia Neighborhood Plan.* Proposed building heights would be about 15 feet taller (one to two stories) than the existing height limits, which would not affect the existing pattern of building heights and scale in the area. Following the expiration of the A-2 Plan in 2009, Parcel B would be designated as NCT and the 65-foot height limit would remain. Anticipated development would not disrupt or divide an established community or have a substantial adverse impact on the existing character of the vicinity." [Q-7]

- The text in Chapter 4, page 4-64 of the DEIR, last sentence in the second full paragraph is revised as follows:

"The total household population and households as reported by the 2000 Census is slightly lower than that of the Planning Department's *LUA 2002* projections for the year 2004~~, which would be consistent with growth that is likely to have taken place between 2000 and 2004~~. The *LUA 2002* indicates there would be about a one percent growth in population in the Plan area between 2000 and 2004." [AA-16]

- The following text has been added to Chapter 4, page 4-69 of the DEIR, after the first paragraph of the Housing Affordability discussion.

"While the Plan cannot ensure that affordable housing would be built in the Project Area, the affordability requirements imposed on the Central Freeway parcels, and the City's Inclusionary Housing Program could provide up to about 870 affordable units, or up to 20 percent of the total 4,440 units projected for the Project Area. Development of these units, however, is almost exclusively dependent on market interventions and public subsidies given the difficulties of providing affordable housing under market-rate conditions." [AA-6]

- The text in Chapter 4, page 4-69 of the DEIR, second paragraph, fifth sentence is revised to read as follows:

"...The San Francisco Redevelopment Agency (~~SFRA~~ Redevelopment Agency) would develop approximately half (50 percent) or 400 to 450 of the total units~~;~~ as affordable housing~~, including 200 units of senior housing, on Parcels A to G located in the Western Addition A-2 Redevelopment Plan Area, and Parcel K at the southeast corner of Hayes and Gough Streets~~ on the seven Central Freeway parcels, A, C, G, K, O, Q, and U, that it owns. These sites are interspersed in the alignment of the former freeway, so that the affordable housing developments would be integrated with the market-rate developments...." [Q-8]

- The text in Chapter 4, page 4-69 of the DEIR, third paragraph is revised to read as follows:

"~~The Plan also contains policies that would indirectly make housing more affordable by reducing housing and household costs associated with driving. These measures include, eliminating off-street minimum residential parking requirements; establishing residential parking caps; and separating the cost of parking from the cost of housing. The Plan policies aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing.~~ The Plan policies aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing. The Plan also contains policies that would indirectly make housing more affordable by reducing housing and household costs associated with driving. These measures include eliminating off-street minimum residential parking requirements; established residential parking caps; and separating the cost of parking from the cost of housing. Elimination of minimum off-street parking requirement would reduce the unit cost of housing by allowing a developer to build

more housing on site. According to the San Francisco Legislative Analyst, approximately 20 percent more San Francisco households would qualify for mortgages for units without parking than for units with parking (Office of Legislative Analyst, San Francisco Housing Development, June 11, 2003). Establishing residential parking caps would have the same effect, by not creating an incentive to "over-park" new residential development and, thus, increase housing costs per unit. Separating the cost of parking from the cost of housing also makes housing more affordable because it enables potential buyers to choose if they want to include parking in their housing costs instead of parking being a built- in price factor. With materials, construction and land costs somewhat fixed during development, parking is one of the few direct costs to a developer that could be reduced by these policy changes. The Plan policies aimed at increasing the affordable housing supply, also address the need to maintain existing affordable housing." [U-24]

- Footnote 13 in Chapter 4, page 4-69 of the DEIR, is replaced with the following text.

"[13] ~~Housing projects that require Condition Use authorization are required to meet a 12 percent affordability requirement.~~ In March 2002, the Board of Supervisors approved legislation to create the Residential Inclusionary Affordable Housing Program which requires 10 percent of units in all projects with 10 units or more to be made affordable, and 12 percent of the units if Conditional Use Authorization is required. Three pieces of legislation were introduced by members of the Board of Supervisors to increase the requirements of the Inclusionary Affordable Housing Program, Planning Code Sections 315 et seq. In summer 2006, the Board of Supervisors adopted legislation expanding the program to require 15 percent inclusionary units for residential projects of five units or more when units are provided on-site and to 20 percent when units are constructed off-site and require that units be made available to households earning less than currently required." [AA-6]

- The text in Chapter 4, page 4-72 of the DEIR, last paragraph, second sentence is revised to read as follows:

"...Half of the affordable housing, including 200 units of senior housing would be provided by the Redevelopment Agency on Parcels A ~~to G located in the Western Addition A-2 Redevelopment Plan Area, and Parcel K at the southeast corner of Hayes and Gough Streets~~, C, G, K, O, Q, and U. The interspersing of these

affordable housing sites along the former Central Freeway corridor would result in an integration of affordable with market-rate housing...." [Q-9]

- The text in Chapter 4, page 4-83 of the DEIR, first full paragraph, first sentence is revised to read as follows:

"West of Van Ness Avenue, large-scale public and cultural buildings extend beyond their formal grouping around Civic Center Plaza, and include: the ornate, Spanish Revival ~~central administrative offices of the San Francisco Unified School District (135 Van Ness Avenue)~~ building at 135 Van Ness Avenue (former central administrative offices of the San Francisco Unified School District); Davies Symphony Hall/Zellerbach Hall (201 Van Ness Avenue); the classical War Memorial Opera Building and Veterans' Hall (301 Van Ness Avenue), separated by a manicured garden on visual axis with City Hall; and, the California State Office Building (505 Van Ness Avenue)." [A-16]

- The text in Chapter 4, page 4-83 of the DEIR, third paragraph, second sentence is revised to read as follows:

"~~Its~~ Visual characteristics are defined by rows of small ground-level retail frontages with colorful window displays; restaurants, some with outdoor seating; markets; and small, neighborhood-serving and specialty retail businesses, some with housing above (see Figure 4-9: Viewpoint 8)." [A-17]

- The text in Chapter 4, page 4-96, of the DEIR third paragraph, first sentence is amended to read as follows:

"Sources of light and glare around Project Area neighborhoods are generally limited to the interior and exterior lights of buildings and lighting visible through windows, lights in parking lots, and city street lights." [AA-23]

- The text in Chapter 4, page 4-97 of the DEIR, third paragraph, first sentence is revised to read as follows:

"The proposed Plan could result in the removal of visual elements with neutral or low aesthetic value, including surface parking lots and, in some cases, underutilized and deteriorated buildings, as well as, landscape and other streetscape improvements

to public streets and open spaces, thereby potentially enhancing the visual quality of the Project Area." [L-6]

- The text in Chapter 4, page 4-97, of the DEIR starting with the last sentence of the last paragraph and continuing on to page 4-98 is revised to read as follows:

  "Building heights within Hayes Valley, Duboce Triangle and the Inner Mission areas would range from 30 to ~~50~~55 feet (compared to existing height limits of 40 to 105 feet); heights on the frontages of Franklin and Market Streets would be slightly taller. Along Market Street, the Plan's proposed building heights of 85 feet (compared to the existing 60, 80, and 105 height limits) could create a uniform ~~85-foot~~ street wall that would extend from Franklin Street to Church Street. Beyond Church Street, building heights would step down to 65 feet (compared to the existing height limit of 50 feet). On Franklin Street, heights would be ~~65~~85 feet (compared to the existing height limit of 80 feet) between Market Street and ~~north to~~ Fell Street. ~~and generally 50 to 65 feet f~~From Fell Street to McAllister Street, the western edge of Franklin Street would have 50 to 65-foot height limits (same as the existing height ranges) and the eastern edge of Franklin Street would have 80 and 160-foot height limits (compared to existing 130 and 160-foot height limits). North of McAllister Street, heights would increase to ~~85~~65 to 120 feet on the western frontage of Franklin Street (compared to the existing 65-foot height limit)." [AA-24]

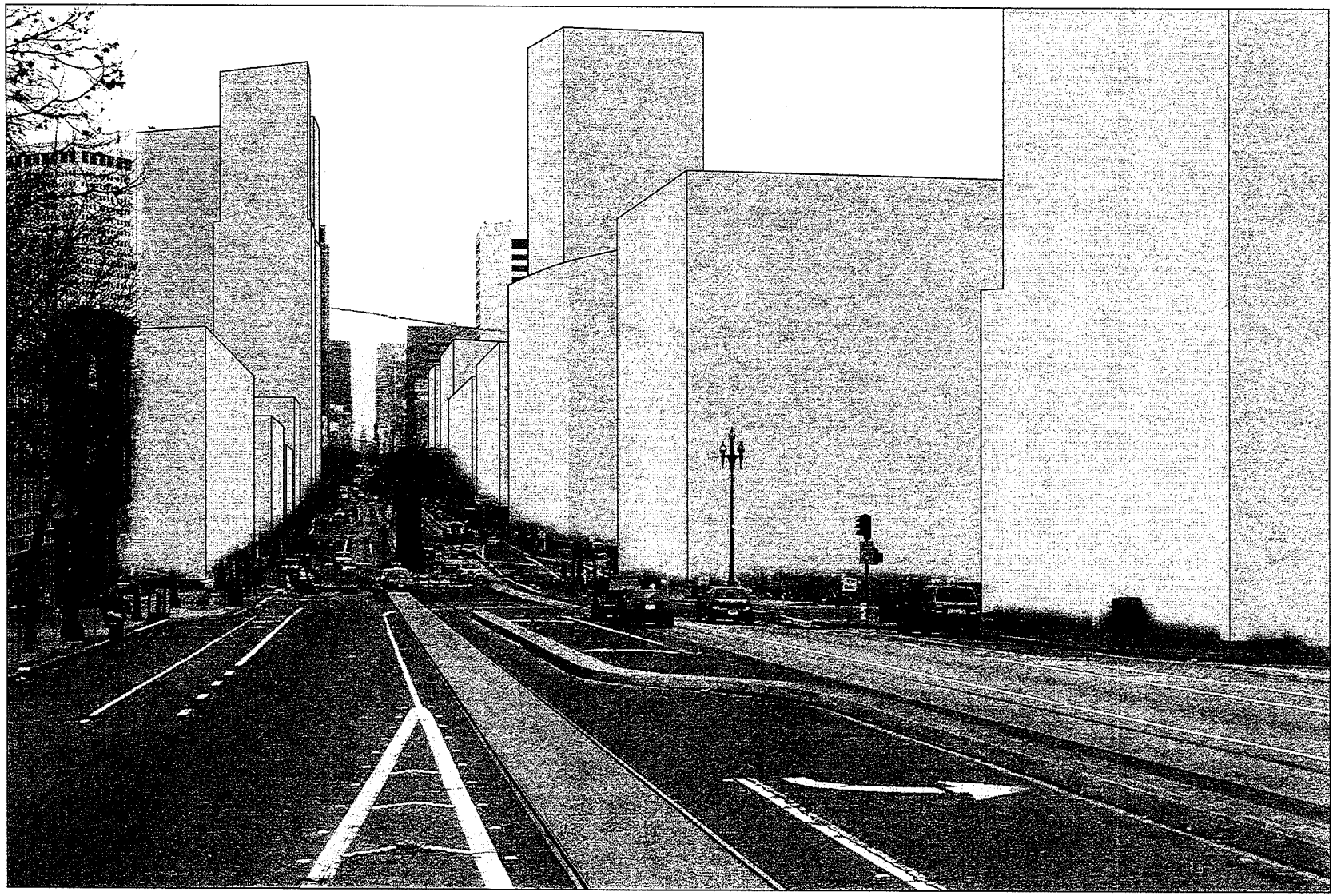
- The following text is added in Chapter 4, page 4-98 of the DEIR, following the third paragraph, third sentence, to reflect the changes in height limits:

  "The height limit for the parcel directly south of Market Street over the BART tunnel would remain at 120 feet." [O-1]

- Figure 4-14 on page 4-101 of the DEIR, Figure 4-15 on page 4-103 of the DEIR, and Figure 4-16 on page 4-109 of the DEIR are revised as shown on the following pages to include background fill. [AA-24]

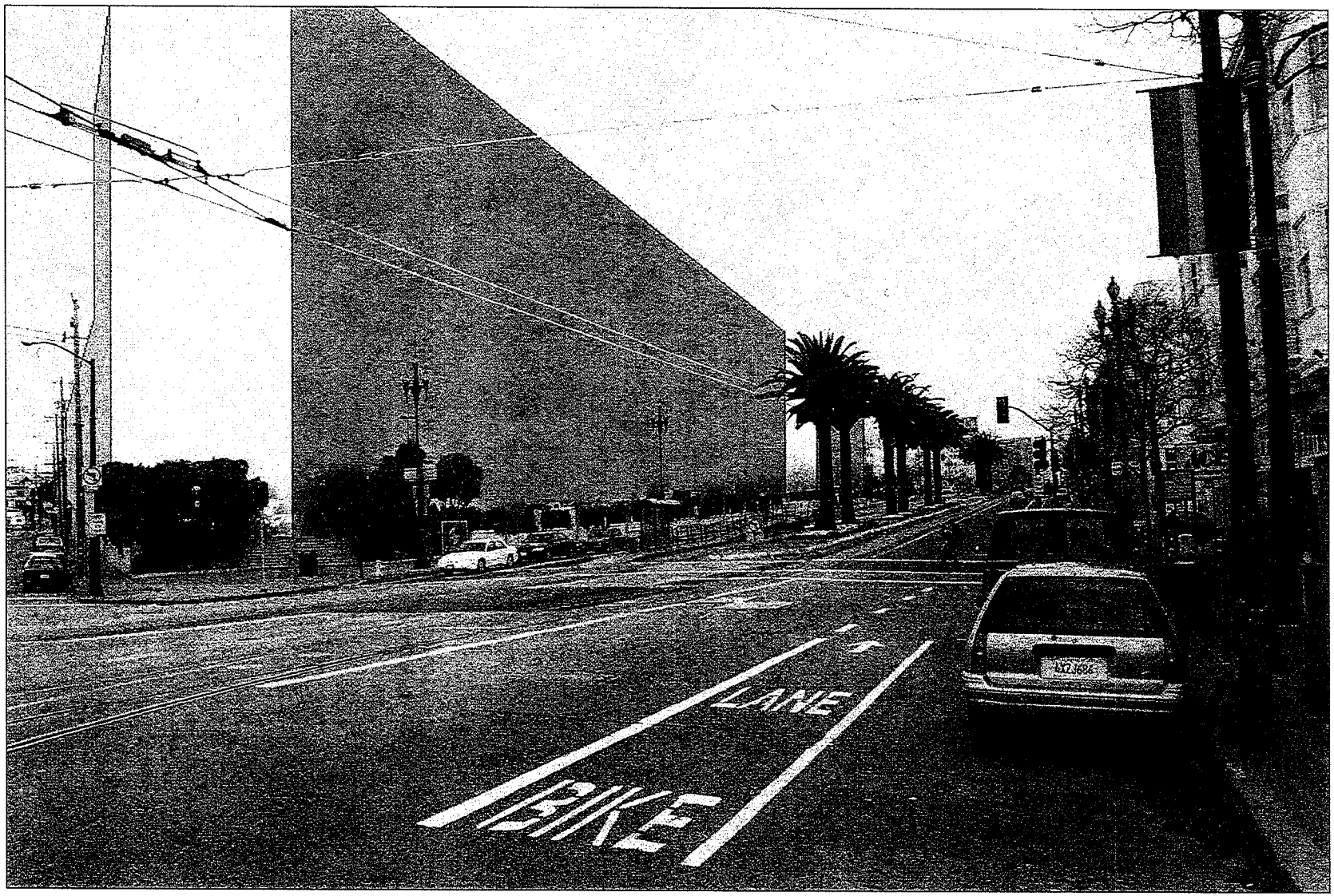
- The text in Chapter 4, page 110 of the DEIR, first paragraph, second sentence is revised to read as follows:

  "Other upgraded spaces could include the intersections of Market Street with major



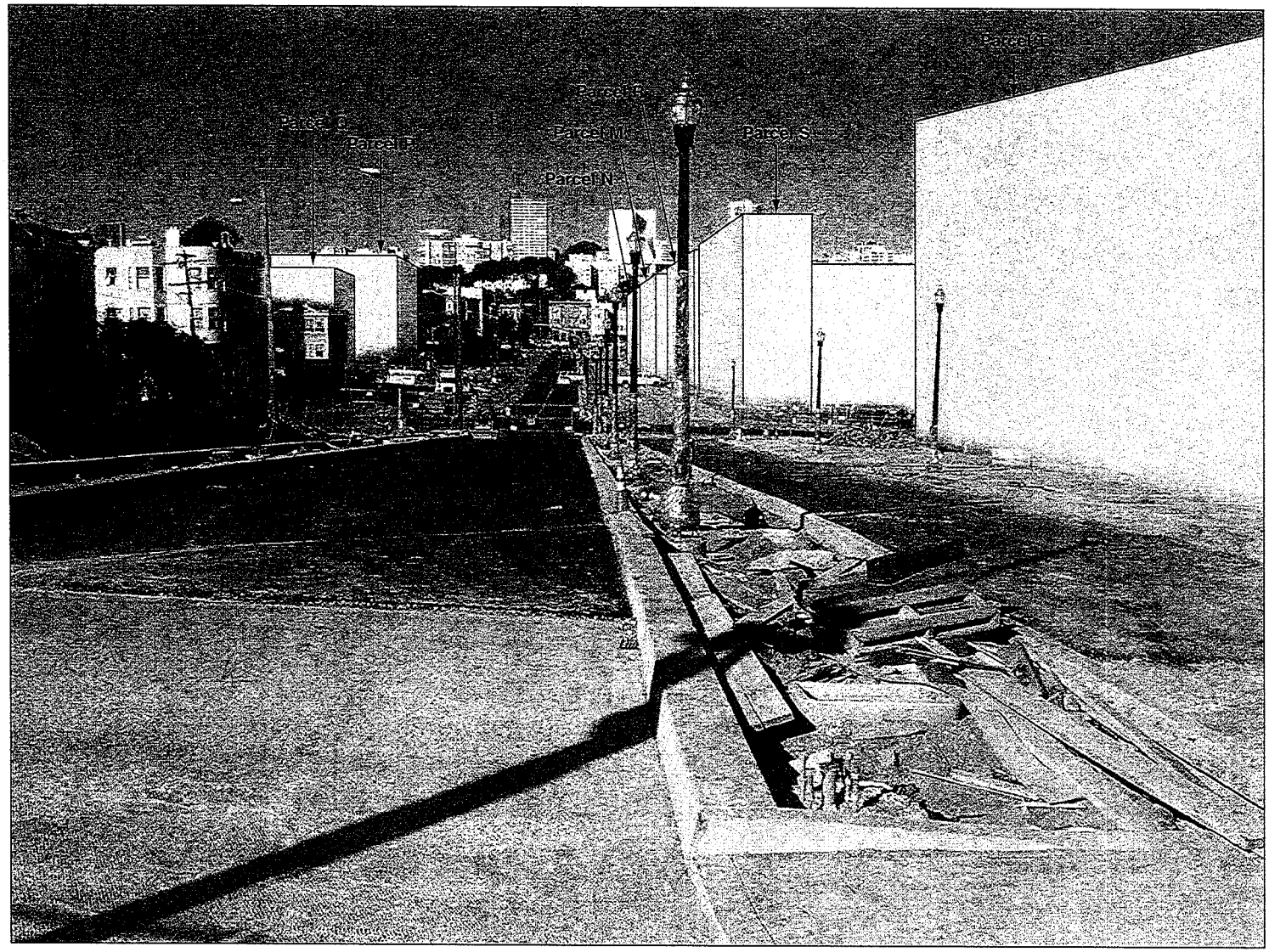
SOURCE: Environmental Science Associates

Figure 4-14
Revised
Viewpoint S1: Market Street, Looking East



SOURCE: Environmental Science Associates

Figure 4-15
Revised
Viewpoint S2: Market Street, Looking Southeast



SOURCE: Environmental Science Associates

Figure 4-16
Revised
Viewpoint S3: Octavia Boulevard, Looking North

streets, ~~for example at Delores Street,~~ where the opportunity for creation of small landscaped plazas would exist.

- The following text in Chapter 4, page 4-128 of the DEIR, second paragraph, first sentence, is revised as follows to reflect this change in height limits:

  "In the summer, future 250- and ~~320~~400-foot-tall towers east of the block bounded by Market, Twelfth, Otis and Gough Streets would cast shadow on the square beginning at the first Proposition K minute (6:48 AM), although from about 10:00 AM to about 3:00 PM the square would not be shaded." [O-1]

- The text in Chapter 4, page 4-128 of the DEIR, last two paragraphs continuing on page 4-129 is revised to read as follows:

  "Development of the Central Freeway parcels A and C would ~~potentially~~ not result in ~~increased~~ significant shadow impacts on Hayward Playground and Jefferson Square. ~~Development of Central Freeway parcels L, K, M, and O would result in shadows on the proposed Hayes Green.~~ The general shadow impacts of development on Parcels A and C on Hayward Playground are summarized under program level impacts, Hayward Playground, page 4-119, while the results of development specific shadow studies are summarized below.[2] Development of Central Freeway parcels L, K, M, and O would result in shadows on the proposed Hayes Green.

  ~~A shadow study was conducted as part of a project-specific environmental review for Parcels A and C to evaluate the year-round *Proposition K* impact on Hayward Playground as well as Jefferson Square, located just north of the Project Area. This analysis was prepared for the San Francisco Redevelopment Agency for the *Western Addition A-2 Redevelopment Plan* Amendments Project, Case No. 2002.0211E. That project proposed to increase heights on Parcel A to 96 feet and analyzed building heights on Parcel C at 130 feet, which is slightly taller than the height limits proposed by the Market Octavia Plan. As such, the impacts for that project are slightly greater than would result under the Plan. This analysis found that potential future~~

[2] The shadow study for the 7th Amendment to the *Western Addition A-2 Redevelopment Plan* is on file and available for public review at the Planning Department, 1660 Mission Street, Case File No. 2002.0211E, and at the San Francisco Redevelopment Agency, 770 Golden Gate Avenue, 3rd Floor.

~~development under Plan conditions on Parcels A and C would increase shading on the two parks by about 0.6 percent, for a total shadow coverage of 3.4 percent. That is, the project impact would leave the two parks in sunlight for more than 96 percent of the year-round *Proposition K* hours.~~ Shadow studies for Parcels A and C were completed for the 7th Amendment to the *Western Addition A-2 Redevelopment Plan.*[3] The 7th Amendment brought the development standards for Parcels A and C into consistency with the *Market and Octavia Neighborhood Plan*, modifying the heights on these parcels from 50/130 feet to 96/130 feet. The shadow studies concluded that the proposed developments on Parcels A and C would have no significant or adverse shadow impact on Hayward Playground and Washington Square." [Q-10]

- The text in Chapter 4, page 4-135 of the DEIR, third paragraph, fourth and fifth sentences, is deleted and replaced with the following text:

"...~~Parcel A, at the southeast corner of Turk and Gough Streets intersection has a proposed height limit of 85 feet (an increase of 20 feet); Parcel C, at the northwest corner of the Golden Gate and Franklin Streets intersection has a proposed height limit of 120 feet (an increase of 60 feet), and Parcel V near the northeast corner of the Market Street and Octavia Boulevard intersection has a proposed height limit of 85 feet (a reduction of 20 feet). Development on these parcels may require further analysis under CEQA before a determination of wind impacts on these parcels may require further analysis under CEQA before a determination of wind impacts could be made.~~ The wind-related effects of Parcels A and C were considered in wind studies conducted for the 7th Amendment to the A-2 Plan. The environmental review for the amendment found that the combination of the maximum heights for Parcels A and C; the variation in height and street wall planes; and the variation in height of the facades would result in no adverse changes in ground-level winds.[4] Parcel V, near the northeast corner of the Market Street and Octavia Boulevard intersection, has a proposed height of 85 feet (a reduction of 20 feet) and may be subject to further wind analysis under CEQA...." [Q-1]

[3] Ibid.

[4] The wind study for the 7th Amendment to the *Western Addition A-2 Redevelopment Plan* is on file and available for public review by appointment at the Planning Department, 1660 Mission Street, Case File No. 2002.0211E, and at the San Francisco Redevelopment Agency, 770 Golden Gate Avenue, 3rd Floor.

- The following text in Chapter 4, page 4-155 of the DEIR, is added to the last paragraph, following the first sentence:

  "...Archaeological resource data for Parcels A and C is available as part of the environmental record for the 7th Amendment to the A-2 Plan.[5] Mitigation measures were identified for all of the potentially significant impacts associated with the proposed development program for these sites...." [Q-11]

- The text in Chapter 4, page 4-156 of the DEIR, second paragraph is revised to read as follows:

  "The potential impacts on the remaining ~~15~~13 parcels: ~~A, C,~~ H, K, L, M, N, O, P, Q, R, S, T, U, and V are discussed below." [Q-11]

- The text in Chapter 4, page 4-156 of the DEIR, fourth paragraph, last sentence is revised to read as follows:

  "...Thus, for Parcels ~~A, C,~~ H, K, L, M, N, O, P, Q, R, S, T, U, and V, land use regulations proposed in the Plan could potentially result in potentially significant impacts to archaeological resources." [Q-11]

- The following text is added to Chapter 4, page 4-161, before the first paragraph, to incorporate previously omitted survey data:

  "**Mid-Market Redevelopment Plan EIR Historic Survey, 2002**

  A historic resources evaluation was conducted for the Mid-Market Redevelopment Plan EIR.[6] The evaluation of historic resources included a review of four other previously conducted surveys, existing historic districts, such as the San Francisco Civic Center, as well as new field work and research. The Mid-Market Redevelopment Plan EIR identified one historic resource that is located within the boundaries of the *Market and Octavia Neighborhood Plan*: the Western Merchandise Mart at Tenth and Market Streets. The Western Merchandise Mart is a Category 1 property in Article 11 of the *Planning Code*." [H-1]

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[5] The historical resources study for the 7th Amendment to the *Western Addition A-2 Redevelopment Plan* is on file and available for public review at the Planning Department, 1660 Mission Street, Case File No. 2002.0211E, and at the San Francisco Redevelopment Agency, 770 Golden Gate Avenue, 3rd Floor.

[6] Planning Department File No. 2002.0805E

- The text in Chapter 4, page 4-163, footnote 62 of the DEIR is revised to read as follows:

  "[62] ~~Conflicting construction dates, addresses and architects are given for this building. Article 10 identifies the construction date as 1926 and designed by architect John Reid, Jr., neither of which appears accurate. The SF Historic Resource Inventory identifies the year built as 1910, designed by architect Newton J. Tharp, and located at 170 Fell Street. Since the building was moved in 1913 for the construction of the Civic Auditorium, the year built date of 1910 seems more likely~~ The building at 135 Van Ness Avenue was designed by John Reid, Jr. and constructed on the site in 1926. It originally served as Commerce High School which was relocated from its former site at 170 Fell Street." [A-24]

- The text in Chapter 4.0, page 4-169 of the DEIR, last paragraph, last sentence and continuing on page 170, is revised to read as follows:

  "Individual projects proposed within the Project Area would be subject to existing city land use controls including design review during the permitting stage to promote ~~ensure~~ compatibility with adjacent historical resources, to ~~avoid~~ discourage demolition of historical resources and to encourage ~~ensure that~~ re-use proposals that are consistent with the *Standards*."

- The text in Chapter 4, page 4-170 of the DEIR, last sentence of the first paragraph, is revised to read as follows:

  "~~Site specific impacts would need to be evaluated for individual projects before they are approved.~~ When individual projects are proposed for development each will be evaluated for its impact on historic resources per the requirements of CEQA and the procedures for evaluation of historic architectural resources, including: 1) whether the project itself would have a direct impact on historic resources and 2) whether the project would impact the historic context of a particular resource and/or would have an incidental impact on nearby resources." [H-1]

- The following text is added in Chapter 4, page 4-188 of the DEIR, at the end of the fourth paragraph:

  "In addition, Muni provides late night (owl) service within the Plan Area, including the 5-Fulton, 14-Mission, 22-Filmore, 90-Owl, L-Taraval, and N-Judah." [R-13]

- The text in Chapter 4, page 4-190 of the DEIR, second paragraph under the heading Caltrain, the last sentence is revised to read as follows:

  "~~In June of 2004, the service was inaugurated with five express routes per day in each direction.~~ As of December 2005, the service offers 11 express weekday routes per day in each direction (a total of 22 trains per day)." [R-14]

- The text in Chapter 4, page 4-197 of the DEIR, second paragraph, first sentence is revised to read as follows:

  "The existing on-street and off-street parking conditions were examined within the Project Area (see Figure 4-2~~1~~2, page 4-18~~7~~99~~, for Project Area boundaries~~). [A-25]

- Based on the information presented in Table C-5, the last paragraph in Chapter 4, page 4-197 of the DEIR is revised to read as follows:

  "As of December 2005, within ~~Within~~ the Project Area, there are ~~34~~31 off-street ~~public~~ parking facilities providing a total of approximately 3,800 ~~3,160~~ spaces (See Appendix 9-C, Table C-5, page 9.C-6 for a list of the existing off-street parking facilities within the Project Area at the end of 2005). Approximately 1,040 spaces are reserved for designated employees or monthly parkers, while 2,760 spaces are available to the general public for hourly or daily parking. Although the Civic Center garage is outside of the Project Area, (see "31" on Figure 4-22) it is included in the analysis due to its size and proximity to the Project Area. ~~Weekday, midday, and evening parking occupancy counts were not collected for this study; however, a qualitative assessment of parking conditions was conducted through field observations. Overall, during the week the on-street and off-street facilities in the Project Area were generally near capacity midday, whereas during the weekday evening, spaces were generally available in the off-street facilities and near capacity on street.~~ About ten public parking lots (340 spaces) have been eliminated within the *Market Octavia Neighborhood Plan* Project Area since 2002, most of them along the east side of Octavia Boulevard. However, two surface parking lots opened under the Octavia Boulevard ramp north of Mission Street in February 2006 with a combined capacity of approximately 120 parking spaces. With the addition of these two parking lots, the total number of parking spaces 3,920. Occupancy counts

conducted in March 2006 indicated that the lots are approximately one-third full during a typical weekday midday.

Several weekday, midday and evening parking occupancy counts have been conducted in the vicinity of the Project Area.[7] The results of the counts are summarized in Table 4-16a.

Table 4-16a
Existing (September 2005) Off-Street Parking Supply and Occupancy
By Time of Day on a Typical Weekday

Type	Spaces(1)	10 AM		4 PM		6 PM	
- Reserved	1,043	858	82%	831	80%	499	48%
- Public	2,762	2,720	98%	2,297	83%	943	34%
Total spaces	**3,805**	**3,578**	**94%**	**3,128**	**82%**	**1,442**	**38%**

(1) Marked spaces
Note: The boundaries for these counts were slightly different than the boundaries of the DEIR Project Area.
Source: Wilbur Smith Associates – January 2006

Off-street facilities in the Project Area are almost at capacity (94 percent) by 10 AM, decreasing to approximately 82 percent of capacity by 4 PM. After 6 PM on a typical weekday (no evening performance), the parking facilities in the Project Area are below 40 percent of their maximum capacity. Similarly additional information has been gathered for evening parking occupancy with and without evening performances, which is summarized in the Table 4-16b.

Table 4-16b
Existing (2005) Off-Street Parking Supply and Occupancy
Weekdays at 8 PM

Type	Spaces(1)	No Event		One Event		Three Events	
- Reserved	987	299	30%	693	70%	747	76%
- Public	2,351	574	24%	1,487	63%	1,763	75%
Total spaces	**3,338**	**873**	**26%**	**2,180**	**65%**	**2,510**	**75%**

7 Better Neighborhoods, 2002; S.F. Parking Authority, 2005; Wilbur Smith Associates, 2005

Table 4-16b Existing (2005) Off-Street Parking Supply and Occupancy Weekdays at 8 PM
(1) Marked spaces; does not include those facilities that are closed by 8 PM Note: The boundaries for these counts were slightly different than the boundaries of the DEIR Project Area.
Source: Wilbur Smith Associates – January 2006

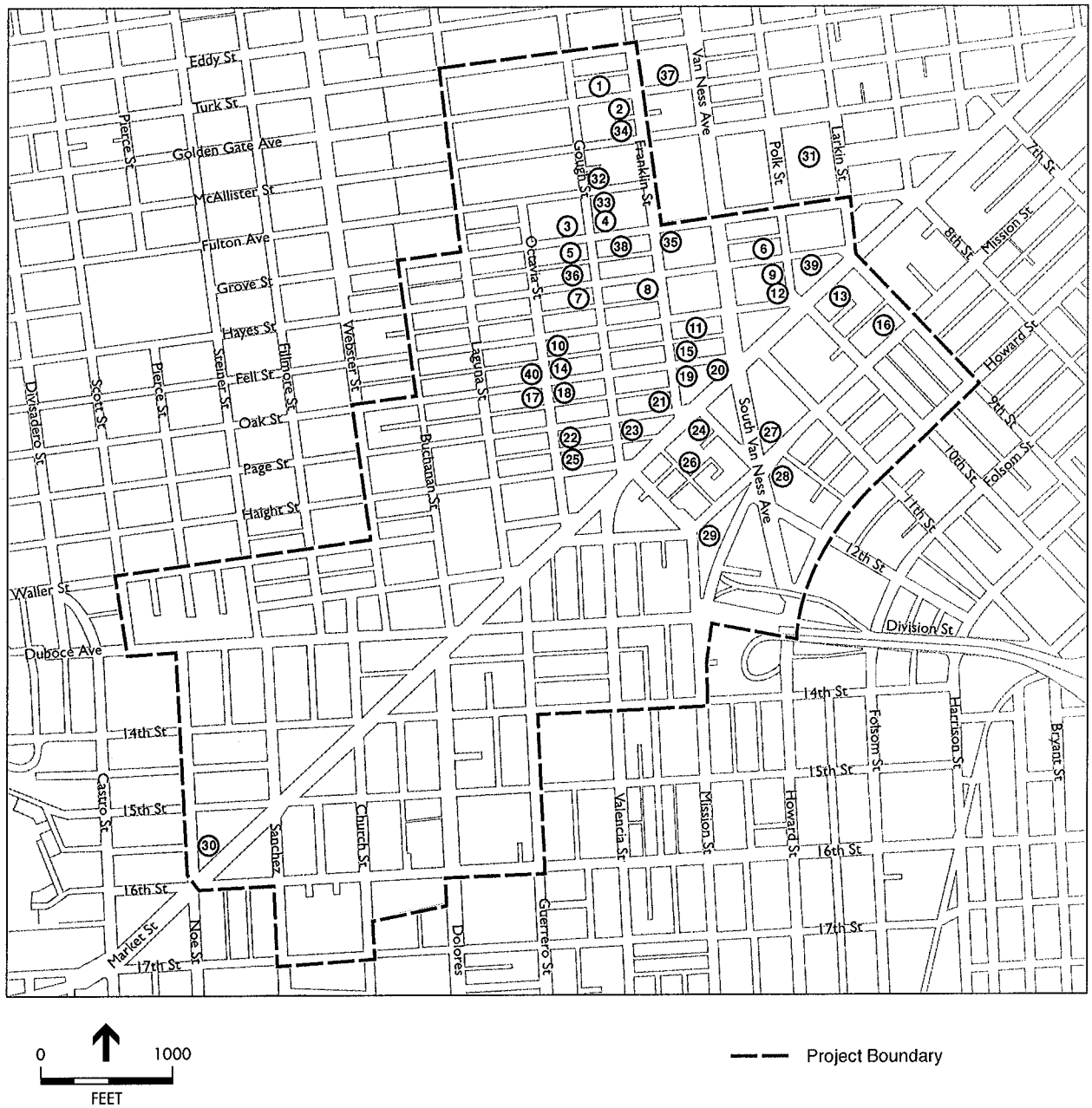
Evening parking occupancy on a performance night in the Project Area is about two and a half times higher than on a non-performance night (65 percent vs. 26 percent). The parking demand increases to 75 percent on those nights when three events (Symphony, Opera, and Herbst Theater) occur at the same time.[8]" [A-26]

- The following text is added in Chapter 4, page 4-198 of the DEIR, at the end of the Parking section:

"Although state law requires employers providing parking subsidies within air quality non-attainment areas to offer parking cash-out programs, the current collective bargaining agreement with unionized workers at the Performing Arts Organization mandates the provision of 300 parking spaces for use by employees of the Opera, 224 spaces for Ballet employees, and 102 spaces for Symphony employees. The Performing Arts employees have reserved parking in two lots on Fulton Street between Franklin and Gough Streets (Numbers 32 and 33 on Figure 4-22 Revised, page 3-32), one lot at the corner of Franklin and McAllister Streets (Number 34), and one lot on Hayes Street (Number 36). Lot 36 is a Central Freeway Parcel (Parcel J) and the Plan outlines specific development guidelines for these parcels. Lots 32, 33, and 34, which would be subject to the general development guidelines of the Plan, could transition from parking to residential or commercial uses with or without the implementation of the Plan (see Table C-5, Appendix 9-C for the development status as of September 2005)." [A-2]

Figure 4-22, Existing Year Off-Street Parking on page 4-199 of the DEIR is amended as shown on the following page to identify the additional parking facilities identified in the 2005 parking

[8] In 2005 there were 24 occasions out of a total of 286 event days (8.4 percent) when three performances took place simultaneously on a weekday evening (Expansion Feasibility Study Progress, Presentation to the San Francisco Parking Authority, Walker Parking, November 30, 2005).



SOURCE: Wilbur Smith Associates

Figure 4-22
Revised
Existing Year Off-Street Public Parking

- survey. [A-26]

  The text in Chapter 4, page 4-209 of the DEIR, second sentence of the first paragraph, is revised to read as follows:

  "~~As such, the parking demand was determined by the anticipated increase in residential uses in the Project Area, and based on the number and size of the units.~~ As such, this study determined the increase in parking demand for future residential uses in the Project Area by estimating the number and size of residential units based on the parking demand methodology in the *SF Guidelines.*"[9] [A-27]

- The text in Chapter 4, page 4-209 of the DEIR, third paragraph, second and third sentences is revised to read as follows per this comment and subsequent direction from the Redevelopment Agency:

  "...The City ~~Redevelopment Agency~~ has proposed that all of the Central Freeway parcels sold to market rate developers include at least 15 percent affordable units. The Central Freeway parcels developed by the Redevelopment Agency, Parcels A, C, G, K, O, Q, and U, ~~would likely include an equal or higher percentage of~~ are proposed as 100 percent affordable units. Other development within the Project Area may not provide any affordable units (due to their size) or would provide ~~between 10 and 12~~ approximately 15 percent affordable units (as required in other parts of the city). Due to the uncertainty of how the development would proceed with the Plan, it was conservatively estimated that about 10 percent of the units would be affordable units." [Q-12]

- The following text has been added to Chapter 4, page 4-230 of the DEIR, Parking Impacts, ahead of the Program Level section:

  "***Future Parking Demand Conditions***

  About 340 off-street parking spaces have been eliminated within the Project Area since 2002 (almost all of them due to the removal of the Central Freeway and the

[9] *SF Guidelines*, Appendix G - Residential Parking Demand: 1.1 spaces for studio/1-bedroom units and 1.5 spaces for 2+ bedroom units

construction of Octavia Boulevard).[10] In addition, based on information provided by the San Francisco Planning Department and the San Francisco Parking Authority (See Table C-5 in Appendix 9-C) it is estimated that approximately 980 spaces would be eliminated as part of the Plan or other private development projects within the Project Area (260 spaces reserved for Performing Arts employees, 160 spaces reserved for City employees, 90 private spaces and 480 public spaces). Thus, the overall parking space reduction between 2002 and the Plan's completion date is approximately 1,320 spaces. Table 4-23a summarizes existing and future parking conditions within the Project Area at different times on a typical weekday.

Table 4-23a
Existing and Future Off-Street Parking Supply and Occupancy
By Time of Day on a Typical weekday

Scenario	Spaces(1)	10 AM	4 PM	6 PM
Existing (2005)	3,805	94%	82%	38%
Future	2,825	127%	111%	51%
Parking shortfall (approx. spaces)		750	300	n.a.

(1) Marked spaces
Note: The boundaries for these counts were slightly different than the boundaries of the DEIR Project Area.
Source: Wilbur Smith Associates – January 2006

As shown in the table, there would be an off-street parking shortfall of about 750 spaces within the study area by 10 AM once some of the existing spaces are eliminated as part of the Plan or other private development projects. The shortfall would be reduced to about 300 spaces by 4 PM. By 6 PM the future supply would be able to accommodate the expected demand. The number of spaces shown in Table 23a refers to marked spaces and additional spaces could be made available by implementing valet parking during the day. It is estimated that the implementation of valet parking would increase the available parking supply by 280 spaces during the day.

Table 4-23b provides information about existing and future parking occupancy for

[10] Expansion Feasibility Study Progress, Presentation to the San Francisco Parking Authority, Walker Parking, November 30, 2005.

evening weekday nights with and without evening performances.

Table 4-23b
Existing and Future Off-Street Parking Supply and Occupancy
Weekdays at 8 PM

Scenario	Spaces[1]	No Event	One Event	Three Events
Existing (2005)	3,338	26%	65%	75%
Future	2,358	37%	92%	106%
Parking shortfall (approx. spaces)		n.a.	n.a.	150

[1] Marked spaces; does not include those facilities that are closed by 8 PM.
Note: The boundaries for these counts were slightly different than the boundaries of the DEIR Project Area.
Source: Wilbur Smith Associates – January 2006

There would not be an evening parking shortfall within the study area on those nights with only one performance. On those nights when three performances take place simultaneously (Symphony, Opera, and Herbst Theater), the parking demand would be six percent above the capacity of the facilities (150 spaces). On the other hand, approximately 200 additional spaces could be made available in the evening with the implementation of valet parking within the study area, which would eliminate the expected shortfall." [C-1]

- In Chapter 4, page 4-231 of the DEIR, the following sentence is added at the end of the first full paragraph:

  "The estimated parking shortfalls shown in Table 4-25 for each development condition do not include the shortfall of approximately 750 spaces (refer to Table 4-23a) that would occur independent of the Plan." [C-1]

- The following text is added to Chapter 4, page 4-232 of the DEIR, after the first sentence of the second full paragraph:

  "On those nights when three performances take place simultaneously (Symphony, Opera, and Herbst Theater) there would be an additional parking shortfall of 150 spaces, due to reduction of parking spaces caused by the Plan or other private

development projects.[11]" [C-1]

- The text in Chapter 4, page 4-233 of the DEIR, the first sentence of the last paragraph is revised to read as follows:

  "None of the programs recommended by the Civic Center Parking Analysis would include construction of new parking supply ~~increase the supply of parking spaces~~ within the study area and the overall shortfall would be the same." [M-20]

- The text of Chapter 4, page 4-234 of the DEIR, first sentence of the first full paragraph, is revised to read as follows:

  "The potential new ~~residential~~ developments within the Project Area ~~would eliminate existing off-street parking lots, particularly those located along the former Central Freeway parcels (estimated to be about 160 spaces)~~ that will take place as part of the Plan or other private projects would eliminate approximately 980 spaces from existing parking lots." [A-33]

- The text in Chapter 5, page 5-6 of the DEIR, first paragraph, first sentence is revised to read as follows:

  "This measure shall apply to any project involving any soils-disturbing activities including excavation, installation of foundations or utilities or soils remediation beyond a depth of four feet and located within those properties within the Project Area for which no archaeological assessment report has been prepared, including by a qualified MEA staff."

- The text in Chapter 5, page 5-17 of the DEIR, third paragraph, last sentence, is revised to read as follows:

  "As such, this mitigation measure would lessen delay and congestion at the intersection of Hayes Street/Van Ness Avenue ~~in order to maintain acceptable intersection levels of service operations, the Plan could note be implemented on~~

[11] In 2005 there were 24 occasions out of a total of 286 event days (8.4 percent) when three performances took place simultaneously on a weekday evening (Expansion Feasibility Study Progress, Presentation to the San Francisco Parking Authority, Walker Parking, November 30, 2005).

~~Hayes Street~~." [L-14]

- Table C-5 in Chapter 5, page 9.C.6, Appendix 9-C, listing the location and characteristics of the parking facilities is deleted and replaced with the following text:

Table C-5 Existing Year Publicly-Available Off-Street Parking Supply[1]		
#	Name/Location	Spaces Supplied
1	750 Golden Gate (at Gough - SE corner)	50
2	659 Franklin (at Golden Gate - SW corner)	85
3	400 Grove (at Gough - NW corner)	33
4	360 Grove (Performing Arts Garage)	519
5	401 Grove (at Gough - SW corner)	67
6	101 Polk (at Hayes - NW corner)	60
7	475 Hayes (at Octavia - SE corner)	84
8	309 Hayes (at Franklin - SW corner)	35
9	101 Hayes (at Polk - SW corner)	53
10	399 Fell (at Octavia - SE corner)	29
11	101 Fell (at Van Ness - SW corner)	48
12	25 Polk (at Polk -SW corner)	66
13	1355 Fell (at Larkin -SW corner)	200[2]
14	298 Oak (at Octavia - SW corner)	27
15	110 Franklin (at Oak - NE corner)	43
16	50 Ninth Street (at Mission - NW corner)	160[3]
17	301 Oak (at Octavia - SW corner)	11
18	299 Oak (at Octavia - SE corner)	28
19	98 Franklin (at Oak - SE corner)	78
20	15 Oak (at Van Ness)	29
21	1 Franklin (at Page - NW corner)	40
22	170 Octavia (between Rose and Page)	36
23	70 Gough (at Page - SE corner)	32
24	1525 Market (between 12th Street and Brady)	68
25	98 Haight (at Octavia - NE corner)	27
26	Brady - East Side (between Market and Mission)	105
27	1500 Mission (at South Van Ness - NE corner)	160[4]
28	1537 Mission (at South Van Ness - SE corner)	44[5]
29	1660 Mission (at McCoppin)	59
30	281 Noe Street (at Market, Market/Noe Center Garage)	38
31	Civic Center Garage (at McAllister/Larkin/Polk)	843
	Total	3,157
Source: Wilbur Smith Associates - September 2004		

~~Table C-5~~
~~Existing Year Publicly-Available Off-Street Parking Supply[1]~~

~~Notes:~~
~~(1) Based on data collected in September 2004. Availability of some facilities have changed due to ongoing construction of Octavia Boulevard.~~
~~(2) Total of 200 spaces, 15 spaces reserved for employees.~~
~~(3) Total of 160 spaces, 29 reserved spaces.~~
~~(4) Total of 160 spaces, 2 spaces reserved for employees.~~
~~(5) Total of 44 spaces, 16 spaces reserved.~~

Table C-5, Revised
Year 2005 Off-Street Parking Supply in the Market Octavia Project Area

No.	Name/Location	Type	Notes	Status	Spaces(*)
1	750 Golden Gate	Public		Fwy parcel to be dev.	50
2	659 Franklin	Public		Fwy parcel to be dev.	85
3	400 Grove	Public		Fwy parcel to be dev.	33
4	360 Grove	Public	Performing Arts garage	Up to 630 w/ valet	600
5	401 Grove	**Reserved**	City employees only	Fwy parcel to be dev.	67
6	101 Polk	Public			60
7	475 Hayes	**Reserved**	City employees only	Fwy parcel to be dev.	84
8	309 Hayes	Public		Site to be developed	35
9	101 Hayes	Public			53
10	399 Fell	Public	Residential develop.	**Eliminated by 12/05**	29
11	101 Fell	Public		Project in review	48
12	25 Polk	Public		Site to be developed	66
13	1355 Market	**Reserved**	S.F. Mart Bldg.		200
14	298 Oak	Public		**Eliminated by 12/05**	28
15	110 Franklin	Public			43
16	50 Ninth Street	Public		Site to be developed	160
17	301 Oak	**Reserved**	City employees only	Fwy parcel to be dev.	11
18	299 Oak	Public		**Eliminated by 12/05**	28
19	98 Franklin	Public			78
20	15 Oak	**Reserved**	Monthly and resid. only		29
21	1 Franklin	**Reserved**	Monthly and resid. only		40
22	170 Octavia	Public		**Eliminated by 12/05**	36
23	70 Gough	Public	Fenced/closed	**Eliminated by 12/05**	32
24	1525 Market	**Reserved**	Union lot	Site to be developed	68

Table C-5, Revised
Year 2005 Off-Street Parking Supply in the Market Octavia Project Area

25	98 Haight	Public	Fenced/closed	**Eliminated by 12/05**	27
26	Brady (East side of Market to Mission	**Reserved**	City employees only		105
27	1500 Mission	**Reserved**	Goodwill store		40
28	1537 Mission	**Reserved**	Monthly and resid. only	Site to be developed	20
29	1660 Mission	Public			59
30	281 Noe Street	Public	Market/Noe Center		38
31	355 McAllister	Public	Civic Center garage	970 to 1,010 w/ valet	843
32	490 Fulton	**Reserved**	Opera/Ballet/ Symphony Employees	Site to be developed	90
33	495 Fulton	**Reserved**	Opera/Ballet/ Symphony Employees	Site to be developed	63
34	700 McAllister	**Reserved**	SFUSD/Opera/Ballet/ Symphony Employees		70
35	398 Franklin	**Reserved**	Davies Hall	Project in review	52
36	450 Hayes	**Reserved**	Opera/Ballet/ Symphony Employees	Fwy parcel to be dev.	36
37	601 Van Ness	Public	Opera Plaza		100
38	325 Grove	**Reserved**	Grove Symphony Lot	Project in review	12
39	51 Hayes	Public	Fox Plz., closed at 8 PM	Up to 500 w/valet	411
40	302 Oak	**Reserved**	FAIS, closed at 8 PM		56
				Total as of September 2005	**3,984**
				Total as of December 2005	**3,804**

Source: Wilbur Smith Associates – January 2006, Supplemental Data Collected in September 2005.
Notes:
(*) Marked spaces
Two parking lots totaling approximately 120 spaces opened in February 2006 under the Octavia Boulevard off-ramp north of Mission Street, but were not included in the updated survey.

[A-26]

The following two tables are added to Chapter 5, page 9.C.6 of the DEIR, Appendix C, following Table C-5:.

Table C-5a
Year 2005 Existing Off-Street Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
1	750 Golden Gate	63	48	16	3	79	50	11	6	79	50	16	18
2	659 Franklin	74	68	26	15	74	68	32	64	74	68	32	64
3	400 Grove	53	51	23	34	65	56	38	42	65	56	38	53
4	360 Grove	329	342	124	77	417	386	267	581	417	386	267	616
5	401 Grove	74	63	30	16	76	56	32	117	76	63	32	117
6	101 Polk	46	52	24	7	56	20	20	18	57	52	24	41
7	475 Hayes	86	76	40	24	69	36	54	74	86	76	54	74
8	309 Hayes	36	23	12	3	32	25	29	44	36	26	35	44
9	101 Hayes	52	51	21	3	78	72	27	14	78	72	27	19
10	399 Fell	24	26	17	13	22	20	18	26	24	26	18	26
11	101 Fell	80	48	46	48	80	63	16	33	80	63	46	48
12	25 Polk	55	57	17	5	58	60	19	5	58	60	19	5

Table C-5a
Year 2005 Existing Off-Street Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
13	1355 Market	165	159	96	57	160	135	95	133	172	165	118	143
14	298 Oak	23	18	13	7	20	14	11	10	23	18	13	10
15	110 Franklin	34	24	10	11	31	23	13	8	34	24	13	11
16	50 Ninth Street	148	125	51	31	148	121	58	81	158	131	63	96
17	301 Oak	11	9	8	9	9	6	6	5	11	9	8	9
18	299 Oak	23	20	14	17	20	17	7	9	23	20	14	17
19	98 Franklin	101	79	29	21	110	66	21	44	110	79	29	44
20	15 Oak	22	25	13	11	19	16	12	6	22	25	13	11
21	1 Franklin	22	14	13	9	30	30	25	12	30	30	25	12
22	170 Octavia	23	20	12	16	17	16	10	10	23	20	12	16
23	70 Gough	31	28	18	15	22	20	15	17	31	28	18	17
24	1525 Market	56	57	48	16	47	27	8	4	56	57	48	16
25	98 Haight	20	18	20	24	25	21	14	13	25	21	20	24
26	Brady	92	104	58	17	82	87	15	18	92	104	58	18
27	1500 Mission	33	32	19	11	32	27	19	27	34	33	24	29
28	1537 Mission	16	16	10	6	16	14	9	13	17	16	12	14
29	1660 Mission	55	46	19	12	54	45	21	30	58	48	23	35

Table C-5a
Year 2005 Existing Off-Street Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
30	281 Noe Street	35	30	12	7	35	29	14	19	38	31	15	23
31	355 McAllister	896	711	276	149	752	639	265	325	896	711	276	407
32	490 Fulton	43	78	52	38	55	78	73	98	55	82	73	98
33	495 Fulton	37	48	40	20	38	49	48	59	38	49	48	59
34	700 McAllister	34	53	40	41	39	54	51	44	39	54	51	57
35	398 Franklin	52	23	10	16	51	21	24	43	52	23	24	43
36	450 Hayes	57	24	14	7	55	22	16	32	57	24	20	35
37	601 Van Ness	59	62	23	16	62	51	20	48	62	62	23	89
38	325 Grove	6	5	2	1	4	3	1	8	6	5	2	12
39	51 Hayes	460	350	120	40	460	350	120	40	460	350	120	40
40	302 Oak	52	45	6	0	52	45	6	0	52	45	6	0
	Total	**3,578**	**3,128**	**1,442**	**873**	**3,551**	**2,938**	**1,560**	**2,180**	**3,804**	**3,262**	**1,777**	**2,510**

Source: Wilbur Smith Associates – January 2006
Notes:
(*) Marked spaces
Two parking lots totaling approximately 120 spaces opened in February 2006 under the Octavia Boulevard off-ramp north of Mission Street, but were not included in the updated survey.

Table C-5b
Year 2005 Existing Off-Street Percentage Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
1	750 Golden Gate	126%	96%	32%	6%	158%	100%	22%	12%	158%	100%	32%	36%
2	659 Franklin	87%	80%	31%	18%	87%	80%	38%	75%	87%	80%	38%	75%
3	400 Grove	161%	155%	70%	103%	197%	170%	115%	127%	197%	170%	115%	161%
4	360 Grove	55%	57%	21%	13%	70%	64%	45%	97%	70%	64%	45%	103%
5	401 Grove	110%	94%	45%	24%	113%	84%	48%	175%	113%	94%	48%	175%
6	101 Polk	77%	87%	40%	12%	93%	33%	33%	30%	95%	87%	40%	68%
7	475 Hayes	102%	90%	48%	29%	82%	43%	64%	88%	102%	90%	64%	88%
8	309 Hayes	102%	65%	34%	8%	91%	71%	82%	125%	102%	74%	99%	125%
9	101 Hayes	98%	96%	40%	6%	147%	136%	51%	26%	147%	136%	51%	36%
10	399 Fell	83%	90%	59%	45%	76%	69%	62%	90%	83%	90%	62%	90%
11	101 Fell	167%	100%	96%	100%	167%	131%	33%	69%	167%	131%	96%	100%
12	25 Polk	83%	86%	26%	8%	88%	91%	29%	8%	88%	91%	29%	8%
13	1355 Market	82%	80%	48%	29%	80%	68%	47%	66%	86%	82%	59%	72%
14	298 Oak	84%	65%	47%	25%	73%	51%	40%	36%	84%	65%	47%	36%
15	110 Franklin	80%	56%	23%	26%	73%	54%	30%	19%	80%	56%	30%	26%
16	50 Ninth Street	92%	78%	32%	20%	92%	76%	36%	51%	99%	82%	39%	60%

Table C-5b

Year 2005 Existing Off-Street Percentage Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
17	301 Oak	100%	82%	73%	82%	82%	55%	55%	45%	100%	82%	73%	82%
18	299 Oak	82%	71%	50%	61%	71%	61%	25%	32%	82%	71%	50%	61%
19	98 Franklin	129%	101%	37%	27%	141%	85%	27%	56%	141%	101%	37%	56%
20	15 Oak	76%	86%	45%	38%	66%	55%	41%	21%	76%	86%	45%	38%
21	1 Franklin	55%	35%	33%	23%	75%	75%	63%	30%	75%	75%	63%	30%
22	170 Octavia	64%	56%	33%	44%	47%	44%	28%	28%	64%	56%	33%	44%
23	70 Gough	97%	88%	56%	47%	69%	63%	47%	53%	97%	88%	56%	53%
24	1525 Market	82%	84%	71%	24%	69%	40%	12%	6%	82%	84%	71%	24%
25	98 Haight	74%	67%	74%	89%	93%	78%	52%	48%	93%	78%	74%	89%
26	Brady	88%	99%	55%	16%	78%	83%	14%	17%	88%	99%	55%	17%
27	1500 Mission	82%	80%	48%	29%	80%	68%	47%	66%	86%	82%	59%	72%
28	1537 Mission	82%	80%	48%	29%	80%	68%	47%	66%	86%	82%	59%	72%
29	1660 Mission	92%	78%	32%	20%	92%	76%	36%	51%	99%	82%	39%	60%
30	281 Noe Street	92%	78%	32%	20%	92%	76%	36%	51%	99%	82%	39%	60%
31	355 McAllister	106%	84%	33%	18%	89%	76%	31%	39%	106%	84%	33%	48%
32	490 Fulton	48%	87%	58%	42%	61%	87%	81%	109%	61%	91%	81%	109%
33	495 Fulton	59%	76%	63%	32%	60%	78%	76%	94%	60%	78%	76%	94%

Table C-5b

Year 2005 Existing Off-Street Percentage Parking Occupancy(*) in the Market Octavia Project Area

No.	Name/ Location	No Event				One Event				Multiple Events			
		10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM	10 AM	4 PM	6 PM	8 PM
34	700 McAllister	49%	76%	57%	59%	56%	77%	73%	63%	56%	77%	73%	81%
35	398 Franklin	100%	44%	19%	31%	98%	40%	46%	83%	100%	44%	46%	83%
36	450 Hayes	161%	68%	39%	20%	155%	62%	45%	90%	161%	68%	56%	99%
37	601 Van Ness	59%	62%	23%	16%	62%	51%	20%	48%	62%	62%	23%	89%
38	325 Grove	50%	42%	17%	8%	33%	25%	8%	67%	50%	42%	17%	100%
39	51 Hayes	112%	85%	29%	10%	112%	85%	29%	10%	112%	85%	29%	10%
40	302 Oak	93%	80%	11%	0%	93%	80%	11%	0%	93%	80%	11%	0%
	Total	**90%**	**79%**	**36%**	**22%**	**89%**	**74%**	**39%**	**55%**	**95%**	**82%**	**45%**	**63%**

Source: Wilbur Smith Associates – January 2006

Notes:

(*) Based on marked spaces

Two parking lots totaling approximately 120 spaces opened in February 2006 under the Octavia Boulevard off-ramp north of Mission Street, but were not included in the updated survey.

6.0 IMPACT ANALYSIS FOR PROPOSED PLAN REVISIONS

The Draft Environmental Impact Report (DEIR) for the *Market and Octavia Neighborhood Plan – Draft for Public Review*, December 2002 (the Plan), was published in June of 2005. Since then the Planning Department has introduced a series of revisions to the Plan to respond to neighborhood concerns. These revisions were introduced in the *Proposed Revisions to the Market and Octavia Neighborhood Plan,* May 23, 2006 (May Revisions), which included proposed policy changes and three map revisions: Project Area Boundaries; Proposed Height Districts; and Proposed Land Use Districts. In August 2006 the Planning Department made further changes to the May Revisions and the three maps. The policy language for the proposed revisions were published in the *Draft Market and Octavia, an Area Plan of the General Plan of the City and County of San Francisco* (M&O Area Plan) in August of 2006. This section analyzes the environmental impacts of the proposed changes to the Plan including the May Revisions to the Plan, the maps of August 2006, and the M&O Area Plan (Revisions to the Plan). Except for Section 6.0., the Market and Octavia Neighborhood Plan Comments and Responses document has analyzed the Plan as proposed in 2002. Minor Plan changes proposed to respond to specific comments received during the public review period, are noted in the body of the responses. This section of the Comments and Responses document identifies all of the Planning Department changes that are now included in the Revisions to the Plan and provides an analysis of the impacts of these additional changes as they relate to the impact assessment for the 2002 Plan conducted for the DEIR. References to Sections 4 and 5 of this document are included where more detailed analysis was done in response to specific comments.

6.1 Description of the Proposed Changes to the Plan

The proposed changes included in the Revisions to the Plan, ranging from Project Area boundary adjustments to simple policy clarifications, are described below.

Boundary Adjustments

The proposed revisions reduce the Plan boundaries by approximately 12 blocks – 7 full blocks and 5 partial blocks in five different areas noted below. Some of the partial blocks listed in separate areas below are located on the same block and therefore the blocks overlap. The revised Project Area boundaries exclude the blocks that overlap with other existing area plans in the *General Plan* and

other ongoing community planning efforts. The revised boundaries to be considered by the Planning Commission for Plan Adoption would exclude the following areas (see Figure 6-1 on page 6-3):

- Four blocks which are currently covered in the Civic Center Area Plan of the *General Plan* between Larkin Street, Grove Street, Gough Street, Fell Street, Van Ness Avenue, and Hayes Street;
- One entire block and two partial blocks in the Mid-Market Planning area between Market Street, Eleventh Street, Howard Street, and Ninth Street;
- Three partial blocks in the SoMa West Special Use District bound by Ninth Street, Mission Street, Twelfth Street, and Howard Street (one of these blocks overlaps with one of the blocks noted in the first bullet);
- One partial block located between Mission Street, Duboce Avenue, Valencia Street, and 14th Street currently located in the SoMa West Planning Area Special Use District;
- One and half block between Sanchez Street, 16th Street, Dolores Street, and 17th Street included in the ongoing Eastern Neighborhoods Planning Area administered by the Planning Department; and

Proposed Plan Revisions

Although the proposed changes to the 2002 Plan include a large number of new policies, the major proposals can be summarized in five main areas as noted below:

New Historic Preservation Section

The entire Market and Octavia Project Area is currently undergoing a historic building survey. A new section has been added to the Sense of Place chapter of the Revisions to the Plan that is intended to promote the preservation of notable historic landmarks, individual historic buildings and, features that help to provide continuity with the past. This section prioritizes the timely completion of the historic survey of the Project Area, protects the historic resources and requires full integration of the survey results to the Revisions to the Plan after completion.

SOURCE: EnviroTrans Solutions

Figure 6-1
Revised Location Map
Revisions to the Plan

Land Use District Adjustments

The Revisions to the Plan include a number of land use adjustments noted in Figure 6-2 on page 6-4. The land use adjustments can be categorized in three main areas:

1. Some revisions proposed since the Plan replace the proposed zoning with the existing zoning. For example the Revisions to the Plan replaces the RTO (Residential Transit Oriented) Zoning District at the northwestern corner of the block bounded by 14th Street, Sanchez Street, Duboce Avenue, and Belcher Street with the existing RH-2 (Residential House District, Two Family) Zoning District.

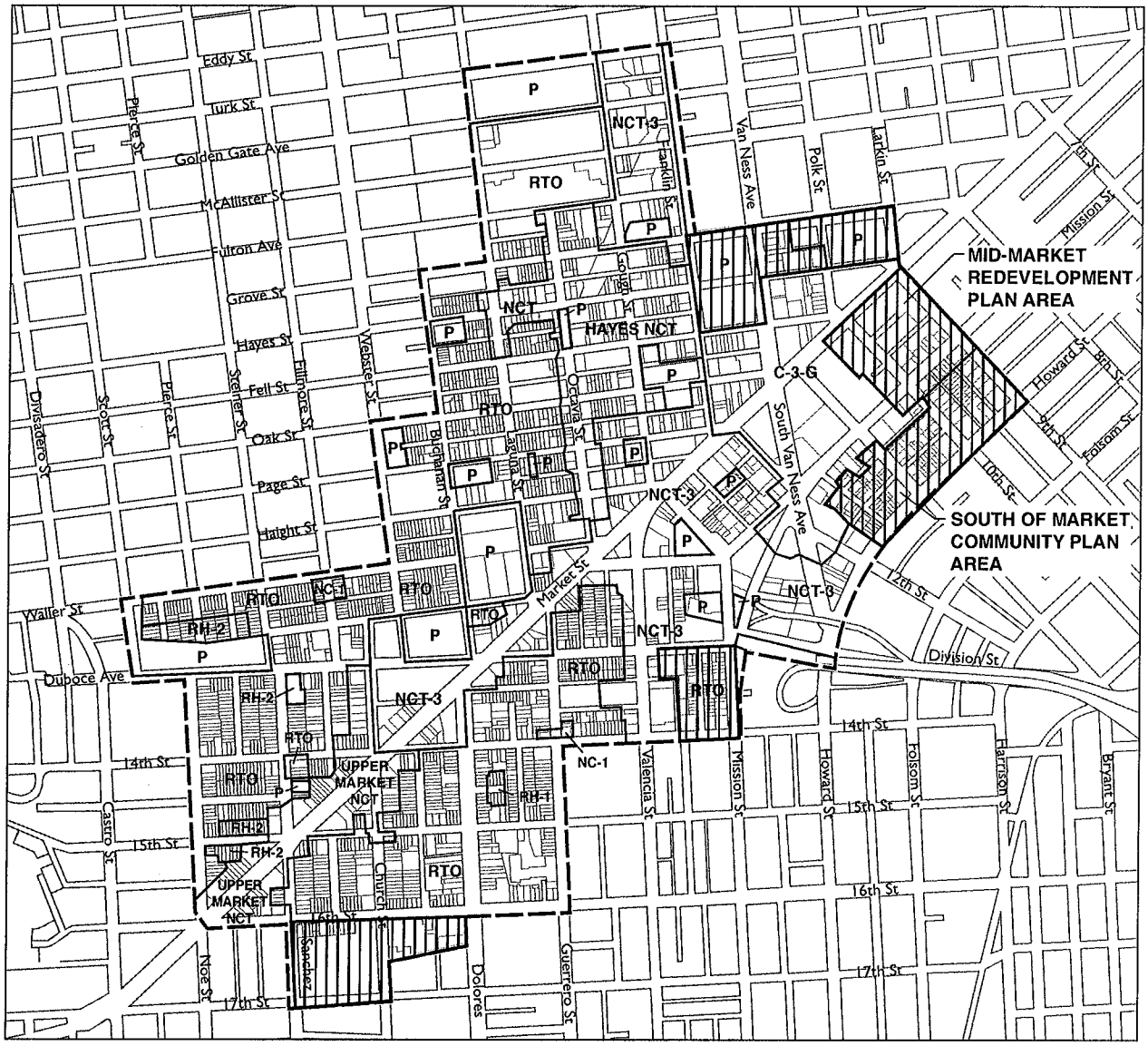
2. Some of the Zoning districts under the Revisions to the Plan have been given new zoning designations, while the land use controls as proposed under the Plan remain the same. Hayes and Upper Market NCTs (Neighborhood Commercial Transit), which have been zoned from NCT to Hayes NCT and Upper Market NCT fall into this category. The lots that have been rezoned from NCT to NCT-3 (Moderate Scale Neighborhood Commercial Transit) also fall into this category.

3. Under the Revisions to the Plan, some of the lots have new zoning designations. For example the center of the block bound by 12th Street, Market Street, Gough Street and Otis Street is rezoned from NCT to P (Public). The lots around the South Van Ness Avenue and Mission Street intersection that have been rezoned from DTR (Downtown Residential) Zoning District to C-3-G (Downtown General Commercial District) Zoning District fall into this category of land use changes. Under the existing controls the northern part of this area is zoned C-3-G and the southern part is zoned C-M (Heavy Commercial District).

Proposed Height and Bulk Adjustments

The new height districts proposed in the Revisions to the Plan (see Figure 6-3, page 6-6) revise some of the heights to be consistent with the existing height limits, reduce the height limits in some areas and increase the heights in a few areas noted below.

The height over the BART tube at South Van Ness Avenue and Market Street has been decreased from 400 feet to 120 feet to reflect engineering constraints identified by BART. Further south on the same block, the heights at the intersection of South Van Ness Avenue and Mission Street have been increased from 250 feet to 400 feet to allow more intense development to the south of the



0 1000 FEET

SOURCE: EnviroTrans Solutions

Project Boundary

C-3-G Downtown Commercial Districts

NC-1 Neighborhood Commercial Cluster

RH-2 Residential Two-Family

RH-1 Residential One-Family

P Public

Deleted from Project Area

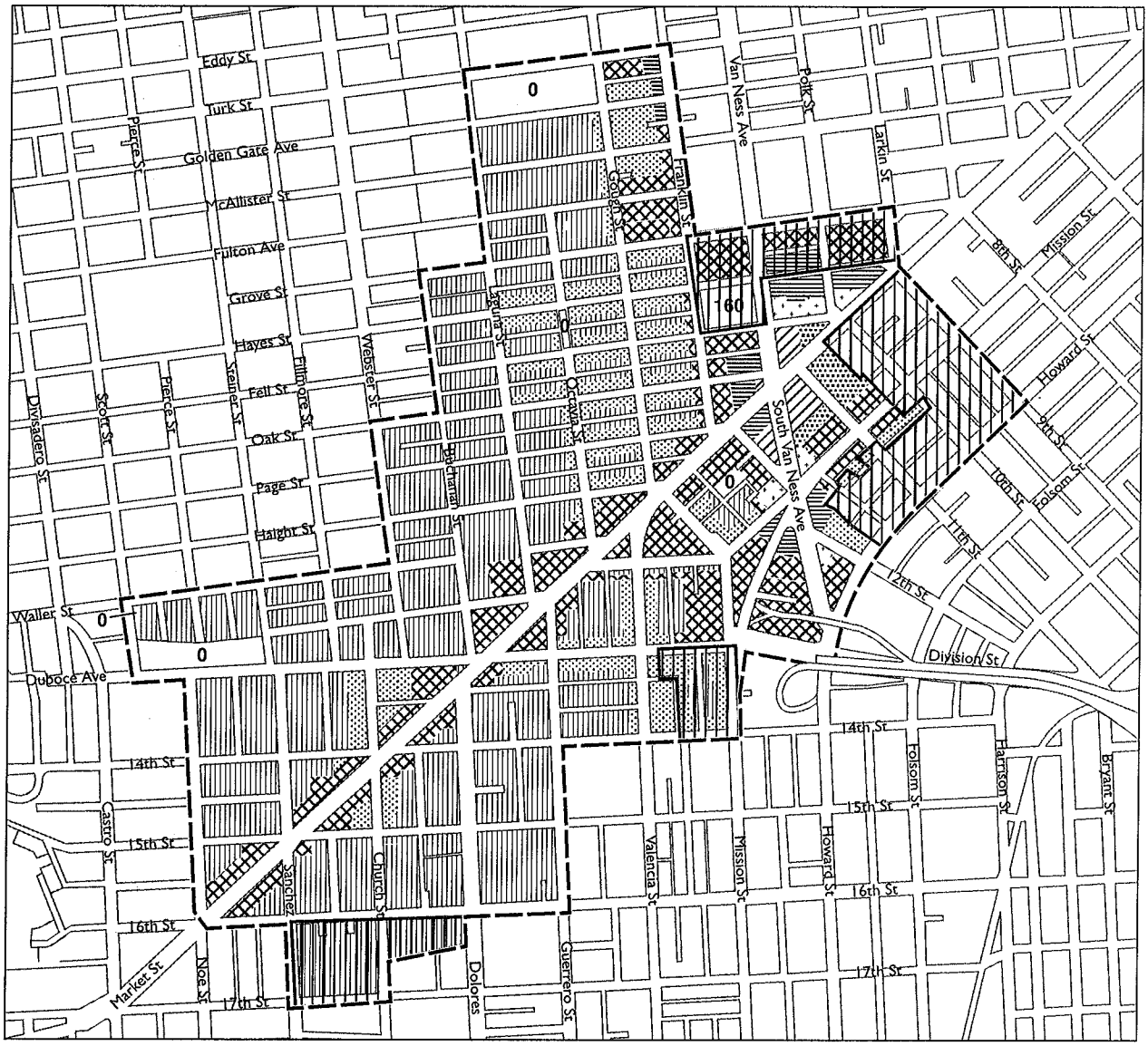
NCT-3 Neighborhood Commercial-Transit (NCT): Moderately-Scaled Mixed-Use Development in Neighborhood Commercial Districts

HAYES NCT Hayes-Gough Neighborhood Commercial Transit (NCT): Mixed-Use Development Compatible with Neighborhood Commercial Districts

UPPER MARKET NCT Upper Market Neighborhood Commercial Transit (NCT); Mixed-Use Development Compatible with Neighborhood Commercial Districts

RTO Residential Transit-Oriented (RTO): Moderately-Scaled Infill in Residential Districts

Figure 6-2
Revised Use Districts
Revisions to the Plan



0 1000
FEET

Project Boundary

0 0 Feet	160 120 Podium/160 Tower
30-40 Feet	120/200-250 Tower
45-55 Feet	120/320 Tower
65-85 Feet	120/400 Tower
96-120 Feet	Deleted from Project Area

SOURCE: EnviroTrans Solutions, San Francisco Planning Department

Figure 6-3
Revised Generalized Height Districts
Revisions to the Plan

BART tube location. Other parcels surrounding the South Van Ness Avenue and Mission Street intersection have been reduced in height from 250 feet to 120 feet since some of the properties were too narrow to accommodate the proposed towers. In addition, further urban design analysis of the skyline led to the conclusion that the towers should be located at the northwest side of the intersection, as noted above. (Refer to Response to Comment O-1, page 3-142 for a more detailed discussion of this proposed change.)

Under the Revisions to the Plan an additional 5-foot height increment would be permitted in the 40-foot and 50-foot Height Districts in the NCT Districts if retail uses are proposed. The 5-foot height increment is intended to allow higher ceiling heights for ground-floor retail uses, but would not result in the addition of an extra floor to the buildings. (Refer to Responses to Comment P-1, page 3-153 for a more detailed discussion of this proposed change.)

The height limit for the block bounded by Grove Street, Gough Street, Fulton Street, and Franklin Street, the site of the Performing Arts garage, was proposed to be partially reduced under the Plan to a height of 50 or 55 feet. The Revisions to the Plan retain the current height limit of 65 feet for this entire site.

The Revisions to the Plan propose to lower the heights on the southern side of east/west residential alleys in the Project Area to preserve a 50-degree sun angle from the north sidewalk to the building corner in order to provide adequate sunlight to the public right-of-way, with a height limit of approximately 35' at the front of the property line for a 35' wide alley. Under the Plan this height limit was set to 30'. (Refer to Response to Comments P-2, pages 3-153/154 and P-5, pages 3-154/155 for a more detailed discussion of this proposed change.) Under the Revisions to the Plan, the building height in these areas can be built to the maximum height permitted under the height limits as long as a set back within the 50-degree angle described above is provided.

Enhanced Implementation Framework

A new chapter has been added that further discusses the final implementation framework for the Revisions to the Plan and outlines a funding strategy and a series of implementing actions. This chapter also outlines a monitoring program that would allow public review of implementation of the Revisions to the Plan.

Revised Parking Controls

The Plan's parking controls have been modified in the Revisions to the Plan to be consistent with the new parking controls for the Downtown Districts (C-3). In general, maximum parking caps have been raised, while relief from the minimum parking requirement remains.

6.2 Impact Analysis

The proposed revisions under the Revisions to the Plan have been deemed to fall into one of the three categories: 1) revisions that are physical in nature and do not create additional environmental impacts; 2) revisions that are non-physical and are exempt from environmental review; and 3) revisions that are proposed as studies and would require further environmental analysis.

The revisions noted under categories 1 and 2 above do not create additional physical impacts beyond those already analyzed in the DEIR for the Plan. The changes included in the Revisions to the Plan reduce the study area by 12 full and partial blocks. In terms of overall impacts the Revisions to the Plan would have either comparable or less impacts relative to the Plan analyzed in the DEIR. The DEIR prepared for the Plan represents a more conservative analysis in terms of overall impacts compared to the Revisions to the Plan.

The following discussion addresses impacts of the proposed revisions in more detail.

Revisions with Potential Physical Changes

New Historic Preservation Section

The new historic resources preservation policies included in the Revisions to the Plan are consistent with the current Planning Department practice for analyzing environmental impacts. Through the City's existing CEQA procedures for assessing potential impacts on historic resources, projects which propose alteration, demolition or new construction are evaluated, on a case-by-case basis, to determine whether there may be a potential adverse impact on an historic resource. This involves review by the Planning Department's historic preservation technical specialists, sometimes with the assistance of outside consultants, to determine whether there is a potential historic resource at risk and whether a proposed project could have an adverse impact on the identified historic resources.

Where appropriate, mitigation measures and alternatives that could possibly reduce or avoid significant impacts are identified.

The DEIR program-level analysis determined that the Plan,, in and of itself, would not have significant impacts on historic architectural resources. Therefore the implementation of stricter policies, as proposed in the Revisions to the Plan, would be consistent with this conclusion and would strengthen the DEIRs findings of no significant impact on any historic architectural resource. Based on the above, the addition of an historic preservation section and related policies would not create a significant impact or trigger the need for new mitigation measures.

Land Use District Adjustments

The category 1 land use changes listed on page 6-4 under Description of the Proposed Changes, Land Use Adjustments, do not create additional environmental impacts since they replace the proposed zoning and retain the existing land use controls. Since there are no changes proposed, the Revisions to the Plan would not create any environmental impacts.

The category 2 land use changes listed on page 6-4 under Description of the Proposed Changes, Land Use Adjustments, basically keep the same zoning controls as proposed under the Plan. Since the environmental impacts of the proposed controls are analyzed in the DEIR there would be no additional environmental impact beyond those identified in the DEIR.

The category 3 land use changes listed on page 6-4 under Description of the Proposed Changes, Land Use Adjustments, propose new zoning designations for some areas. The impacts of some of these zoning changes have already been analyzed in the DEIR. For example the lot at the center of the block bounded by 12th Street, Market Street, Gough Street and Otis Street is rezoned from NCT Zoning District to P Zoning District, but the height designation remains open space or 0 height. The DEIR has already analyzed the environmental impacts of this lot as an open space. Therefore the impacts of land use changes as a result of the rezoning of this lot have already been covered under the DEIR and there would be no additional environmental impacts as a result of the zoning change.

The change to C-3-G Zoning District in the area around the intersection of the Mission Street and South Van Ness Avenue under Category 3 reinstates the existing zoning district for a large portion of the DTR Zoning District. The southern portion of this area under the existing controls is zoned C-M and the DEIR has not analyzed the impacts of this change. In terms of intensity of

development the C-3-G Zoning District is more restrictive than the C-M Zoning District. The maximum development under the C-3-G Zoning District allows a floor area ration (FAR) of 6.0 to 1 while the C-M Zoning District allows a 9.0 to 1.FAR. In terms of development, the C-3-G Zoning District would create less of an impact compared to the C-M Zoning District.

In conclusion the zoning changes proposed under the Market & Octavia Area Plan would not create additional environmental impacts beyond those identified in the DEIR.

Proposed Height and Bulk Adjustments

The proposed height and bulk adjustments near the South Van Ness Avenue and Mission Street intersection would reduce height limits (from 400 feet to 120 feet) and decrease bulk limits resulting in shorter and more slender buildings with smaller square footages. Since the DEIR analyzed the taller height and larger bulk limits for the Project Area, the reduced height and bulk limits proposed for this area under the Revisions to the Plan would have an equal or lesser amount of physical impact and therefore would not create additional impacts. The DEIR analysis of the Plan height and bulk limits in this area present a more conservative analysis compared to the Revisions to the Plan.

The Revisions to the Plan propose a height of 35 feet on the southern side of the 35-foot wide east/west residential alleys to preserve a 50-degree sun angle from the north sidewalk to the building corner in order to provide adequate sunlight to the public right-of-way. Under the Plan this height limit was set at 30 feet.

With the height increase of 5 feet to a maximum of 35 feet, the height limits under the Revisions to the Plan would still be shorter than the existing height limits. The revised height limits at the south end of the east/west alleys would result in equal or smaller square footages of buildings when compared to the existing conditions and therefore implementation of the Revisions to the Plan would not create new significant environmental impacts because of the height change.

In the 40-foot and 50-foot Height Districts in the NCT Districts, the Revisions to the Plan would allow a 5-foot additional height for higher ceilings in retail uses. This increase in height would not increase the overall square footage of the buildings. The total square footage of the buildings under the Revisions to the Plan would remain the same as the ones analyzed in the DEIR. Therefore there would not be additional impact as a result of height increase in terms of intensity of development.

However, there is a potential for additional shadow, visual, view, and wind impacts as a result of the 5-foot height increase as discussed below.

The existing height limit of 65 feet on the block bounded by Grove Street, Gough Street, Fulton Street, and Franklin Street was reduced to 55 feet on the southern half of the block under the Plan. The Revisions to the Plan propose to maintain the existing 65-foot height limit on this block. Since there would be no changes in terms of heights for this block compared to the existing conditions, there would be no environmental impacts.

Higher height limits generally have the potential to create other impacts including those related to shadow, wind, and aesthetics. Raising the height limit by five feet is a minor increase that may add a very small amount of impact as noted above. This amount would be so small that it would be negligible and would not result in new impacts above and beyond what has already been analyzed. The discussion below analyzes the impact in those areas in more detail.

Shadows

Shadow impacts were analyzed for three categories of open spaces identified in the DEIR. For open space protected under Section 295 of the *Planning Code*, individual development proposals would be subject to the requirements of this section. Compliance with this section would ensure that proposed projects would not have an adverse impact on the existing or proposed open spaces protected by this ordinance. The sunlight criteria dictated by Sections 146(a) and 146(c) of the *Planning Code* is not applicable to the proposed NCT Districts and therefore there would be no additional impacts as a result of the increased 5-foot height as it related to these sections.

For open spaces not protected by Section 295 of the *Planning Code*, the DEIR proposes mitigation measure 5.5.A2. This mitigation measure ensures that new buildings or additions to existing buildings with heights above 50 feet be shaped to reduce substantial shadow impacts on public plazas and other publicly accessible spaces. Implementation of this mitigation measure in areas where the height limit is equal to or above 50 feet would reduce, but may not eliminate potentially significant shadow impact. As development proposals within the Project Area are put forward and analyzed, CEQA review would be conducted to determine potential significant impacts from specific projects, on a case by case basis. The DEIR states that the even with the implementation of this mitigation measure, potential for a significant and unavoidable shadow impact would still exist. The increase of building heights by 5 feet in the areas where the height limit is equal to or greater

than 50 feet may create a potential significant shadow impact. The DEIR has already acknowledged the potential for future environmental impact and the process for addressing these impacts.

There are only a few lots in the Upper Market NCT Districts that fall in a 40-foot Height Limit under the existing height controls and the *Market and Octavia Neighborhood Plan.* The proposed 5-foot addition under the M&O Plan Area Plan could potentially create shadow impacts. However, none of these lots are adjacent to any open spaces that are likely to be shaded by the potential 5-foot height increment. Because the area of potential additional height is small, the potential increment of new shadow is minimal, with no identified open space at risk. As noted above, there would be no significant shadow impacts in the NCT Zoning Districts as a result of the 5-foot height increment proposed in the Revisions to the Plan.

For new parks and proposed open spaces, the shadow impacts identified in the DEIR were not significant. Once those properties become public parks, they would be subject to either section 295 of the *Planning Code* or they would be subject to mitigation measure 5.5.A2 of the DEIR or other applicable controls under the *Planning Code.* There are no lots in the proposed NCT Districts near the proposed parks and open spaces where the recommended height limit is taller than the existing height limits and therefore the impact on these parks of the proposed 5-foot height increase would not be significant.

Visual Character

Page 4-99 of the DEIR states: "While the proposed Plan would result in visual changes within the Project Area, these aesthetic changes are intended to improve overall visual quality. Future uses and building designs would be developed pursuant to the city's *General Plan* and urban design controls and guidelines proposed by the proposed *Market and Octavia Neighborhood Plan.* These measures would minimize adverse visual impacts in the Project Area."

The addition of 5 feet of height for proposed retail projects in the NCT Districts is a small increment in the building height that would be subject to the guidelines proposed by the Revisions to the Plan. In addition, the height limits in most of these areas, except for a few lots in the Upper Market area, have been reduced compared to the existing height controls. Similar to the conclusion of the DEIR on page 4-100, the proposed buildings themselves would not result in a substantial demonstrable negative aesthetic effect on the existing visual character or quality of the area and its surroundings. The visual impact would be less than significant.

Views

The proposed 5-foot height increment in the NCT Districts is in areas where the proposed height limits would still be lower than the existing height controls, except for a few lots in the Upper Market area where the height limit remains at 40 feet. The 5-foot height increment proposed in the Revisions to the Plan could alter the views analyzed under the Plan by a small amount. The analysis of the proposed heights in the DEIR concluded that "despite the possible new uses that could be constructed, the proposed Plan would not have a demonstrable negative effect on scenic views or vistas, nor would the Plan damage scenic resources within a state scenic highway. The greatest changes to views would occur in the oblique (diagonal) views to the south and southeast across Market Street, toward the SoMa West neighborhood where the Plan encourages future high-rise buildings where none currently exists." (page 4-104 of the DEIR). The DEIR concludes that the impacts related to views would be considered less than significant (page 4-104).

The height limits in most of the NCT Districts are reduced compared to the existing conditions. Similar to the proposed heights analyzed in the DEIR, the 5-foot height increment proposed in the Revisions to the Plan would not affect the oblique views. The impact of this height increase is therefore considered less than significant.

Wind

The DEIR analyzed the program level wind impacts of buildings ranging from 40 to 400 feet in height. The DEIR identified potential significant wind impacts that could occur with some taller buildings and proposed mitigation measures 5.5.B1 and 5.5B2 to reduce the wind impact to a less than significant level (page 4-133 to 4-135 of the DEIR). The DEIR concluded that with the new standards proposed in the Plan, no project would be approved unless the wind impact was reduced to less than significant.

Buildings at a height of 45 or 55 feet have limited potential for creation of significant wind impacts in San Francisco. However, all buildings in the Project Area would be subject to the mitigation measures noted above when potential wind impacts exist. The buildings proposed for a 5-foot increment in height under the Revisions to the Plan could not be approved unless the wind impacts were reduced to less than significant. Also, the height limits in most of the proposed NCT Districts have been reduced compared to the existing conditions. Therefore the increase of building heights by 5 feet in areas with a 40 or 50-foot height limit as proposed would not have a significant impact.

New Policy Ensuring a Mix of Unit Sizes in New Development

One of the policies of the M&O Area Plan imposes a unit mix requirement for any project larger than four units in the NCT and RTO zoning districts. At least 40 percent of the units in such projects are required to be two-bedrooms or larger, with a "goal" (not required) of 10 percent of the units having three-bedrooms or more.

As per the assumptions stated on page 37 of the background Transportation Study for the DEIR, 50 percent of all of the new residential units were assumed to be studio/one-bedroom and 50 percent two-bedrooms or more.[1] This is 10 percent greater than the Revisions to the Plan proposed requirement for 40 percent of units to be two-bedrooms or larger. The analysis of the DEIR presented a more conservative estimate of the traffic impacts compared to the new 40 percent requirement because larger units generate a greater number of trips per unit than smaller units. The traffic impacts associated with this new requirement would be less than the traffic impacts identified in the DEIR as assumed for the Plan and therefore would not create any new traffic impacts. There would be no other impacts beyond and above what is analyzed in the DEIR associated with this new requirement.

Revised Parking Controls

The Plan's residential parking controls have been modified to be consistent with the new parking controls for the Downtown District (C-3). In general, maximum residential parking caps have been raised, while relief from the minimum parking requirement remains. The transportation analysis in the DEIR analyzed residential parking impacts ranging from no parking requirement as proposed under the Plan to the standard parking requirement of one space per residential unit required under the current *Planning Code.* The new maximum parking caps proposed under the Revisions to the Plan would still be lower than the standard one space per residential unit required under the *Planning Code.* Since the DEIR has analyzed the range of parking requirements between none to one per space and the new caps are 0.75 spaces per unit, the impacts of the new proposal under the Revisions to the Plan have already been evaluated in the DEIR parking analysis completed for the Plan. No additional impacts would be created as the result of this new requirement above and beyond what was already analyzed in the DEIR.

[1] *Final Report Market & Octavia Plan EIR Transportation Study, Case No. 2003.0346E,* May 31, 2005, prepared for the San Francisco Planning Department by Wilbur Smith Associates.

New Policies with No Physical Changes or Activities Exempt under CEQA

A number of new policies and text changes proposed as part of the Revisions to the Plan would not have any physical impacts on the environment and therefore would not create any significant environmental impacts. For example the proposed new policy and text change from the Revisions to the Plan to be added to the "Balancing Transportation Choices" section (page 124 of the Plan) proposes to monitor parking supply in reports published every five-years. This policy proposes a new approach to parking management in a way that is dependent on coupling parking maximum controls with City initiated on-street parking management strategies and private parking management strategies.

This new policy does not per se result in any physical changes and therefore would not have a significant environmental impact. The Revisions to the Plan contain several other new policies similar to the parking policy noted in the paragraph above that are not physical in nature, do not result in physical changes, and therefore do not require additional impact analysis.

Policies such as planting of trees along sidewalks to enhance pedestrian environment and provide a buffer between the street traffic and pedestrian traffic are exempt from CEQA. The policy revisions proposed in the Revisions to the Plan contain some similar policies that are exempt and therefore would not require environmental analysis.

New Studies Proposed with Potential Physical Changes

A number of new or further studies have been proposed as part of the *General Plan* Amendments for the Revisions to the Plan. A policy calling for the study or investigation of an issue is non-physical, in and of itself. The results of any such studies could lead to future project proposals, or alternatively, to the abandonment of an idea or proposal. It is unknown at this time which studies may lead to specific project proposals, and which studies may not. To the extent that a study might lead to a new project proposal, the specific details are unknown at this time and therefore no environmental analysis is presently possible. If the studies advanced through the Revisions to the Plan do ultimately lead to a specific project proposal, any such project would be subject to CEQA analysis in the future, prior to any decision on the project.

For example, the DEIR prepared for the Plan analyzed returning Hayes Street to two-way operations and determined that this would cause significant transit and traffic impacts. As a result of these impacts, the Revisions to the Plan has been amended to eliminate the implementation of

two-way Hayes Street. Policy 5.6.1 under "Balancing Transportation Choices" has been revised to include the possibility of future transportation studies to explore the feasibility of eliminating one-way streets in the Project Area some time in the future. While the elimination of one-way streets could have physical environmental impacts, no such projects are being proposed in the Revisions to the Plan. If a future study ultimately leads to a specific project proposal that would change the operation of one-way streets, that future project would require its own environmental review at that time. This revised policy in the Revisions to the Plan defers the elimination of one-way streets to further studies, and any specific proposals which may emerge from these studies would require further environmental analysis prior to implementation of any such changes to the transportation network. The Revisions to the Plan contain a number of similar policies that are not covered in this DEIR and would be subject to future independent environmental analysis.

7.0 TRANSPORTATION TECHNICAL APPENDIX

This sections contains the transportation technical appendix for the Comments and Responses document. It includes level of service data for the analysis of the two-way Hayes Street operation.

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Table 1:
INTERSECTION LOS COMPARISON - Weekday PM Peak Hour
Existing Year, 2025 with and without Project - Lane Configuation Schemes

Geometric Configurations	Existing Lane Configuration [a]		Existing Lane Configuration [a]		Existing Lane Configuration [a]		Project Lane Configuation [c]		Project Lane Configuation [c]		Project Lane Configuation with Geometric Changes [f]	
INTERSECTIONS	Existing Condition PM Peak Condition		2025 without Project PM Peak Condition		2025 with Project [b] PM Peak Condition		2025 with Project [d] PM Peak Condition		2025 with Project Diversion [e] PM Peak Condition		2025 with Project Diversion [c] PM Peak Condition	
	Delay (s/veh)	LOS	Delay (s/veh)	LOS	Delay (s/veh)	LOS	Delay (s/veh)	LOS	Delay (s/veh)	LOS	Delay (s/veh)	LOS
Hayes Street/ Gough Street	21.4	C	23.4	C	25.3	C	>80.0	F	34.0	C	22.3	C
Hayes Street/ Franklin Street	23.6	C	37.9	D	39.2	D	>80.0	F	22.2	C	24.2	C
Hayes Street/ Van Ness Avenue	76.7	E	>80.0	F	>80.0	F	>80.0	F	65.2	E	45.0	D
Fell Street/ Gough Street	15.1	B	13.5	B	16.7	B	10.4	B	15.4	B	14.4	B
Fell Street/ Franklin Street	9.3	A	11.9	B	11.9	B	49.0	D	73.1	E	41.5	D
Fell Street/ Van Ness Avenue	34.5	C	54.7	D	54.5	D	53.6	D	27.6	C	18.6	C

NOTES:
(a) Based on DEIR Existing Year (2004) - see Figure 1
(b) See Mitigation Measures 5.7.A, 5.7.B and 5.7.G in DEIR
(c) Includes Two-way Hayes Street Conditions - see Figure 2
(d) See Figure 3
(e) See Figure 4
(f) Includes Two-way Hayes Street Conditions and geometric changes to operate under acceptable LOS conditions- see Figure 5

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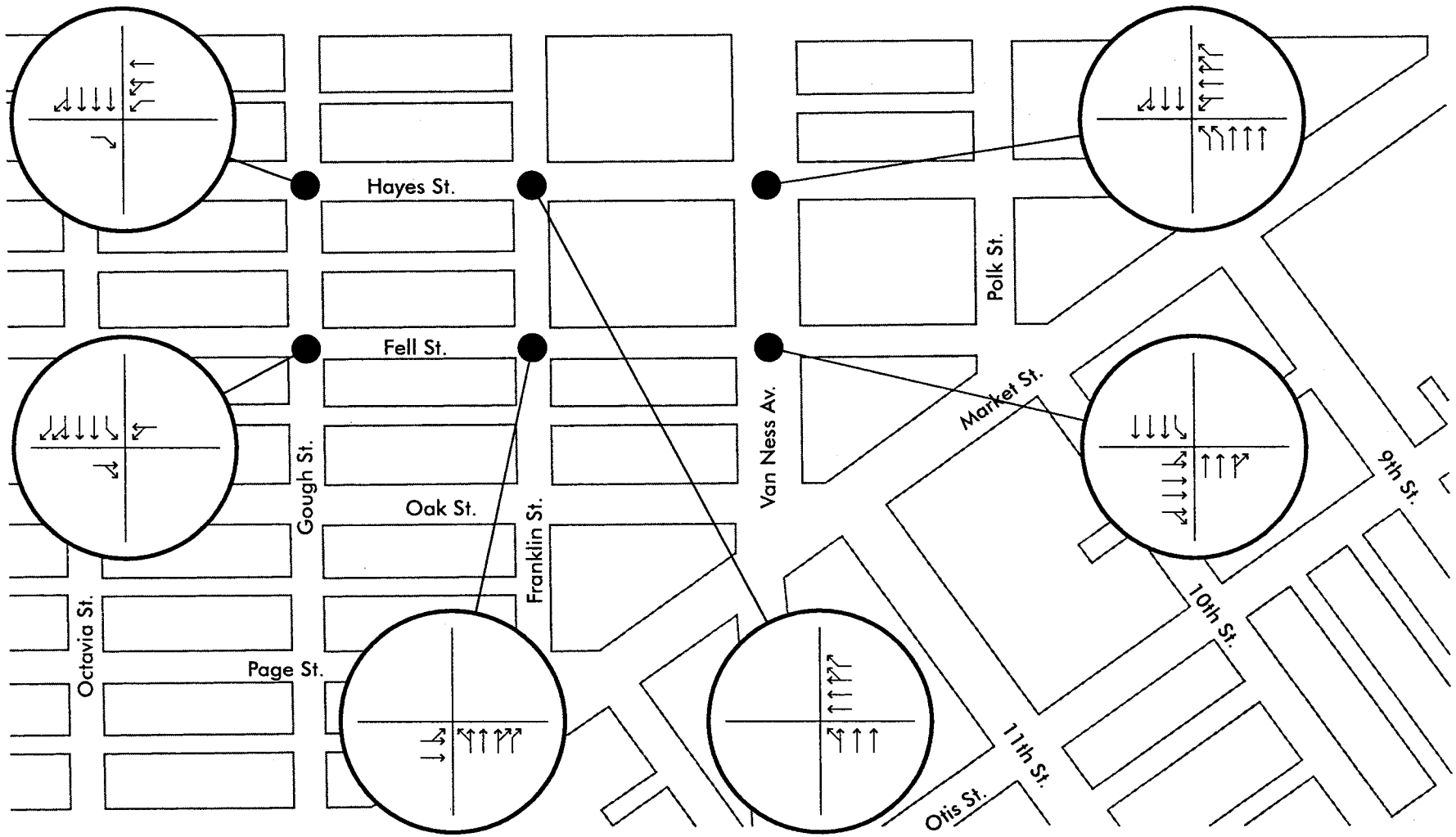
Existing Lane Configuration- Existing Condition



NORTH
NOT TO SCALE

NOTE: * In 2005, the Department of Parking & Traffic (DPT) revised the intersection lane configurations including 3 southbound lanes at Hayes St./Gough St. and 3 eastbound lanes at Fell St./Van Ness Ave.

* Figure presents existing lane configurations based on DEIR analysis for Existing Conditions(Year 2004)

ENGINEERS PLANNERS ECONOMISTS
Wilbur Smith Associates

Figure 1
EXISTING (2004) LANE CONFIGURATIONS
372351/BASE - 03/23/06

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)				4.0	4.0						4.0	
Lane Util. Factor				0.91	0.91						0.86	
Frpb, ped/bikes				1.00	1.00						1.00	
Flpb, ped/bikes				0.78	0.88						1.00	
Frt				1.00	1.00						1.00	
Flt Protected				0.95	0.97						1.00	
Satd. Flow (prot)				1248	2858						5963	
Flt Permitted				0.95	0.97						1.00	
Satd. Flow (perm)				1248	2858						5963	
Volume (vph)	0	0	0	825	349	0	0	0	0	0	2074	41
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	907	384	0	0	0	0	0	2254	45
Lane Group Flow (vph)	0	0	0	454	837	0	0	0	0	0	2299	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type			Free	Perm								
Protected Phases					8						6	
Permitted Phases			Free	8								
Actuated Green, G (s)				23.0	23.0						30.0	
Effective Green, g (s)				22.5	22.5						29.5	
Actuated g/C Ratio				0.38	0.38						0.49	
Clearance Time (s)				3.5	3.5						3.5	
Lane Grp Cap (vph)				468	1072						2932	
v/s Ratio Prot											c0.39	
v/s Ratio Perm				c0.36	0.29							
v/c Ratio				0.97	0.95dl						0.78	
Uniform Delay, d1				18.4	16.6						12.6	
Progression Factor				1.00	1.00						1.00	
Incremental Delay, d2				34.8	5.7						2.2	
Delay (s)				53.2	22.2						14.8	
Level of Service				D	C						B	
Approach Delay (s)		0.0			33.1			0.0			14.8	
Approach LOS		A			C			A			B	

Intersection Summary				
HCM Average Control Delay	21.4	HCM Level of Service	C	
HCM Volume to Capacity ratio	0.86			
Cycle Length (s)	60.0	Sum of lost time (s)	8.0	
Intersection Capacity Utilization	65.2%	ICU Level of Service	B	

dl Defacto Left Lane. Recode with 1 though lane as a left lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)					4.0	4.0		4.0				
Lane Util. Factor					0.86	0.86		0.91				
Frpb, ped/bikes					0.90	0.69		1.00				
Flpb, ped/bikes					1.00	1.00		1.00				
Frt					0.95	0.85		1.00				
Flt Protected					1.00	1.00		1.00				
Satd. Flow (prot)					4079	935		4735				
Flt Permitted					1.00	1.00		1.00				
Satd. Flow (perm)					4079	935		4735				
Volume (vph)	0	0	0	0	1094	989	80	1607	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	0	1128	1020	82	1657	0	0	0	0
Lane Group Flow (vph)	0	0	0	0	1638	510	0	1739	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type						Perm	Perm					
Protected Phases					8			2				
Permitted Phases						8	2					
Actuated Green, G (s)					41.0	41.0		41.0				
Effective Green, g (s)					41.0	41.0		41.0				
Actuated g/C Ratio					0.46	0.46		0.46				
Clearance Time (s)					4.0	4.0		4.0				
Lane Grp Cap (vph)					1858	426		2157				
v/s Ratio Prot					0.40							
v/s Ratio Perm						c0.55		c0.37				
v/c Ratio					1.12dr	1.20		0.81				
Uniform Delay, d1					22.3	24.5		21.1				
Progression Factor					0.15	0.19		0.88				
Incremental Delay, d2					0.6	91.0		2.5				
Delay (s)					4.0	95.7		21.0				
Level of Service					A	F		C				
Approach Delay (s)		0.0			25.8			21.0			0.0	
Approach LOS		A			C			C			A	

Intersection Summary				
HCM Average Control Delay	23.6	HCM Level of Service	C	
HCM Volume to Capacity ratio	1.00			
Cycle Length (s)	90.0	Sum of lost time (s)	8.0	
Intersection Capacity Utilization	90.7%	ICU Level of Service	E	

dr Defacto Right Lane. Recode with 1 though lane as a right lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)					4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor					0.86	0.86	0.97	0.91			0.91	
Frpb, ped/bikes					1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes					0.99	1.00	1.00	1.00			1.00	
Frt					1.00	0.85	1.00	1.00			1.00	
Flt Protected					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)					4732	935	3204	4746			4732	
Flt Permitted					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)					4732	935	3204	4746			4732	
Volume (vph)	0	0	0	70	1550	270	500	1906	0	0	1529	31
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	0	73	1615	281	532	2028	0	0	1627	33
Lane Group Flow (vph)	0	0	0	0	1688	281	532	2028	0	0	1660	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type				Perm		Perm	Prot					
Protected Phases					8		5	2			6	
Permitted Phases				8		8						
Actuated Green, G (s)					30.0	30.0	7.5	52.0			41.0	
Effective Green, g (s)					30.5	30.5	7.0	51.5			40.5	
Actuated g/C Ratio					0.34	0.34	0.08	0.57			0.45	
Clearance Time (s)					4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)					1604	317	249	2716			2129	
v/s Ratio Prot							c0.17	0.43			c0.35	
v/s Ratio Perm					c0.36	0.30						
v/c Ratio					1.05	0.89	2.14	0.75			0.78	
Uniform Delay, d1					29.8	28.1	41.5	14.4			21.0	
Progression Factor					1.00	1.00	0.78	0.32			1.00	
Incremental Delay, d2					37.7	28.5	519.1	1.1			2.9	
Delay (s)					67.4	56.6	551.6	5.7			23.9	
Level of Service					E	E	F	A			C	
Approach Delay (s)		0.0			65.9			119.2			23.9	
Approach LOS		A			E			F			C	

Intersection Summary			
HCM Average Control Delay	76.7	HCM Level of Service	E
HCM Volume to Capacity ratio	1.01		
Cycle Length (s)	90.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	96.7%	ICU Level of Service	E

c Critical Lane Group

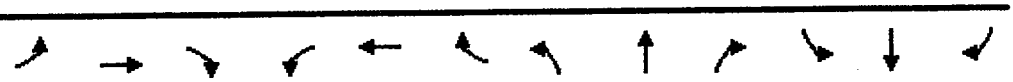
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			1.00					1.00	0.86	0.86
Frt		0.97			1.00					1.00	0.98	0.85
Flt Protected		1.00			0.98					0.95	1.00	1.00
Satd. Flow (prot)		1812			1822					1770	4416	1318
Flt Permitted		1.00			0.80					0.95	1.00	1.00
Satd. Flow (perm)		1812			1484					1770	4416	1318
Volume (vph)	0	103	26	95	118	0	0	0	0	287	1752	929
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	112	28	103	128	0	0	0	0	312	1904	1010
Lane Group Flow (vph)	0	140	0	0	231	0	0	0	0	312	2123	791
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			4					6	6	6
Permitted Phases				4								
Actuated Green, G (s)		15.0			15.0					37.0	37.0	37.0
Effective Green, g (s)		15.0			15.0					37.0	37.0	37.0
Actuated g/C Ratio		0.25			0.25					0.62	0.62	0.62
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		453			371					1092	2723	813
v/s Ratio Prot		0.08								0.18	0.48	c0.60
v/s Ratio Perm					c0.16							
v/c Ratio		0.31			0.62					0.29	0.78	0.97
Uniform Delay, d1		18.3			20.0					5.4	8.5	11.0
Progression Factor		1.00			1.00					0.71	0.94	1.09
Incremental Delay, d2		1.8			7.7					0.4	1.3	18.5
Delay (s)		20.1			27.6					4.2	9.3	30.4
Level of Service		C			C					A	A	C
Approach Delay (s)		20.1			27.6			0.0			14.0	
Approach LOS		C			C			A			B	

Intersection Summary			
HCM Average Control Delay	15.1	HCM Level of Service	B
HCM Volume to Capacity ratio	0.87		
Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	79.3%	ICU Level of Service	C

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0						4.0	4.0			
Lane Util. Factor		0.95						0.86	0.86			
Frt		1.00						0.98	0.85			
Flt Protected		0.99						0.99	1.00			
Satd. Flow (prot)		3508						4369	1362			
Flt Permitted		0.99						0.99	1.00			
Satd. Flow (perm)		3508						4369	1362			
Volume (vph)	74	338	0	0	0	0	218	1613	956	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	79	360	0	0	0	0	222	1646	976	0	0	0
Lane Group Flow (vph)	0	439	0	0	0	0	0	2171	673	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4						2				
Permitted Phases	4						2		2			
Actuated Green, G (s)		17.0						66.0	66.0			
Effective Green, g (s)		16.5						65.5	65.5			
Actuated g/C Ratio		0.18						0.73	0.73			
Clearance Time (s)		3.5						3.5	3.5			
Lane Grp Cap (vph)		643						3180	991			
v/s Ratio Prot												
v/s Ratio Perm		c0.13						c0.50	0.49			
v/c Ratio		0.68						0.68	0.68			
Uniform Delay, d1		34.3						6.6	6.6			
Progression Factor		1.00						0.48	0.45			
Incremental Delay, d2		5.8						0.9	2.9			
Delay (s)		40.1						4.1	5.9			
Level of Service		D						A	A			
Approach Delay (s)		40.1			0.0			4.5			0.0	
Approach LOS		D			A			A			A	

Intersection Summary			
HCM Average Control Delay	9.3	HCM Level of Service	A
HCM Volume to Capacity ratio	0.68		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	75.8%	ICU Level of Service	C
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	
Lane Util. Factor		0.86						0.91		1.00	0.91	
Frt		0.99						0.99		1.00	1.00	
Flt Protected		1.00						1.00		0.95	1.00	
Satd. Flow (prot)		6336						4722		1770	4746	
Flt Permitted		1.00						1.00		0.11	1.00	
Satd. Flow (perm)		6336						4722		213	4746	
Volume (vph)	0	1184	96	0	0	0	0	1756	61	71	1528	0
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	0	1246	101	0	0	0	0	1909	66	81	1736	0
Lane Group Flow (vph)	0	1347	0	0	0	0	0	1975	0	81	1736	0
Turn Type	Perm									D.P+P		
Protected Phases		4						6		5	2	
Permitted Phases	4									6		
Actuated Green, G (s)		36.0						36.0		44.0	47.0	
Effective Green, g (s)		36.0						35.0		42.0	46.0	
Actuated g/C Ratio		0.40						0.39		0.47	0.51	
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		2534						1836		221	2426	
v/s Ratio Prot		c0.21						c0.42		0.03	c0.37	
v/s Ratio Perm										0.14		
v/c Ratio		0.53						1.08		0.37	0.72	
Uniform Delay, d1		20.6						27.5		37.2	17.0	
Progression Factor		1.09						1.02		0.29	0.22	
Incremental Delay, d2		0.6						41.0		3.0	1.2	
Delay (s)		23.0						69.1		13.7	4.9	
Level of Service		C						E		B	A	
Approach Delay (s)		23.0			0.0			69.1			5.3	
Approach LOS		C			A			E			A	

Intersection Summary			
HCM Average Control Delay	34.5	HCM Level of Service	C
HCM Volume to Capacity ratio	0.78		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	85.0%	ICU Level of Service	D
c Critical Lane Group			

Existing Lane Configuration- 2025 without Project

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)				4.0	4.0						4.0	
Lane Util. Factor				0.91	0.91						0.86	
Frpb, ped/bikes				1.00	1.00						1.00	
Flpb, ped/bikes				0.78	0.90						1.00	
Frt				1.00	1.00						1.00	
Flt Protected				0.95	0.98						1.00	
Satd. Flow (prot)				1248	2935						5963	
Flt Permitted				0.95	0.98						1.00	
Satd. Flow (perm)				1248	2935						5963	
Volume (vph)	0	0	0	828	499	0	0	0	0	0	1770	35
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	910	548	0	0	0	0	0	1924	38
Lane Group Flow (vph)	0	0	0	455	1003	0	0	0	0	0	1962	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type			Free	Perm								
Protected Phases					8						6	
Permitted Phases			Free	8								
Actuated Green, G (s)				23.0	23.0						30.0	
Effective Green, g (s)				22.5	22.5						29.5	
Actuated g/C Ratio				0.38	0.38						0.49	
Clearance Time (s)				3.5	3.5						3.5	
Lane Grp Cap (vph)				468	1101						2932	
v/s Ratio Prot											c0.33	
v/s Ratio Perm				c0.36	0.34							
v/c Ratio				0.97	0.95dl						0.67	
Uniform Delay, d1				18.4	17.8						11.6	
Progression Factor				1.00	1.00						1.00	
Incremental Delay, d2				35.2	12.7						1.2	
Delay (s)				53.7	30.5						12.8	
Level of Service				D	C						B	
Approach Delay (s)		0.0			37.7			0.0			12.8	
Approach LOS		A			D			A			B	

Intersection Summary				
HCM Average Control Delay	23.4	HCM Level of Service	C	
HCM Volume to Capacity ratio	0.80			
Cycle Length (s)	60.0	Sum of lost time (s)	8.0	
Intersection Capacity Utilization	62.9%	ICU Level of Service	B	

dl Defacto Left Lane. Recode with 1 though lane as a left lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)					4.0	4.0		4.0				
Lane Util. Factor					0.86	0.86		0.91				
Frpb, ped/bikes					0.90	0.69		1.00				
Flpb, ped/bikes					1.00	1.00		1.00				
Frt					0.95	0.85		1.00				
Flt Protected					1.00	1.00		1.00				
Satd. Flow (prot)					4050	935		4734				
Flt Permitted					1.00	1.00		1.00				
Satd. Flow (perm)					4050	935		4734				
Volume (vph)	0	0	0	0	1188	1148	89	1586	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	0	1225	1184	92	1635	0	0	0	0
Lane Group Flow (vph)	0	0	0	0	1817	592	0	1727	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type						Perm	Perm					
Protected Phases					8			2				
Permitted Phases						8	2					
Actuated Green, G (s)					41.0	41.0		41.0				
Effective Green, g (s)					41.0	41.0		41.0				
Actuated g/C Ratio					0.46	0.46		0.46				
Clearance Time (s)					4.0	4.0		4.0				
Lane Grp Cap (vph)					1845	426		2157				
v/s Ratio Prot					0.45							
v/s Ratio Perm						c0.63		c0.36				
v/c Ratio					1.30dr	1.39		0.80				
Uniform Delay, d1					24.2	24.5		21.0				
Progression Factor					0.17	0.19		0.86				
Incremental Delay, d2					3.7	176.7		2.4				
Delay (s)					7.9	181.3		20.4				
Level of Service					A	F		C				
Approach Delay (s)		0.0			50.5			20.4			0.0	
Approach LOS		A			D			C			A	

Intersection Summary			
HCM Average Control Delay	37.9	HCM Level of Service	D
HCM Volume to Capacity ratio	1.10		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	97.5%	ICU Level of Service	E

dr Defacto Right Lane. Recode with 1 though lane as a right lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)					4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor					0.86	0.86	0.97	0.91			0.91	
Frpb, ped/bikes					1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes					0.98	1.00	1.00	1.00			1.00	
Frt					1.00	0.85	1.00	1.00			1.00	
Flt Protected					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)					4717	935	3204	4746			4733	
Flt Permitted					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)					4717	935	3204	4746			4733	
Volume (vph)	0	0	0	94	1723	301	545	1596	0	0	1466	28
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	0	98	1795	314	580	1698	0	0	1560	30
Lane Group Flow (vph)	0	0	0	0	1893	314	580	1698	0	0	1590	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type				Perm		Perm	Prot					
Protected Phases					8		5	2			6	
Permitted Phases				8		8						
Actuated Green, G (s)					30.0	30.0	7.5	52.0			41.0	
Effective Green, g (s)					30.5	30.5	7.0	51.5			40.5	
Actuated g/C Ratio					0.34	0.34	0.08	0.57			0.45	
Clearance Time (s)					4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)					1599	317	249	2716			2130	
v/s Ratio Prot							c0.18	0.36			c0.34	
v/s Ratio Perm					c0.40	0.34						
v/c Ratio					1.18	0.99	2.33	0.63			0.75	
Uniform Delay, d1					29.8	29.6	41.5	12.8			20.5	
Progression Factor					1.00	1.00	0.76	0.13			1.00	
Incremental Delay, d2					89.4	48.2	599.3	0.1			2.4	
Delay (s)					119.2	77.8	630.9	1.7			22.9	
Level of Service					F	E	F	A			C	
Approach Delay (s)		0.0			113.3			161.9			22.9	
Approach LOS		A			F			F			C	

Intersection Summary			
HCM Average Control Delay	107.9	HCM Level of Service	F
HCM Volume to Capacity ratio	1.06		
Cycle Length (s)	90.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	102.3%	ICU Level of Service	F

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			1.00					1.00	0.86	0.86
Frt		0.97			1.00					1.00	1.00	0.85
Flt Protected		1.00			0.98					0.95	1.00	1.00
Satd. Flow (prot)		1811			1822					1770	4482	1318
Flt Permitted		1.00			0.76					0.95	1.00	1.00
Satd. Flow (perm)		1811			1417					1770	4482	1318
Volume (vph)	0	117	30	127	158	0	0	0	0	262	1603	576
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	127	33	138	172	0	0	0	0	285	1742	626
Lane Group Flow (vph)	0	160	0	0	310	0	0	0	0	285	1750	618
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			4					6	6	6
Permitted Phases				4								
Actuated Green, G (s)		15.0			15.0					37.0	37.0	37.0
Effective Green, g (s)		15.0			15.0					37.0	37.0	37.0
Actuated g/C Ratio		0.25			0.25					0.62	0.62	0.62
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		453			354					1092	2764	813
v/s Ratio Prot		0.09								0.16	0.39	c0.47
v/s Ratio Perm					c0.22							
v/c Ratio		0.35			0.88					0.26	0.63	0.76
Uniform Delay, d1		18.5			21.6					5.3	7.2	8.3
Progression Factor		1.00			1.00					0.82	1.04	1.17
Incremental Delay, d2		2.2			24.8					0.4	0.7	4.3
Delay (s)		20.7			46.4					4.7	8.2	14.0
Level of Service		C			D					A	A	B
Approach Delay (s)		20.7			46.4			0.0			9.2	
Approach LOS		C			D			A			A	

Intersection Summary			
HCM Average Control Delay	13.5	HCM Level of Service	B
HCM Volume to Capacity ratio	0.79		
Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	77.5%	ICU Level of Service	C

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0						4.0	4.0			
Lane Util. Factor		0.95						0.86	0.86			
Frt		1.00						0.97	0.85			
Flt Protected		0.99						0.99	1.00			
Satd. Flow (prot)		3508						4341	1362			
Flt Permitted		0.99						0.99	1.00			
Satd. Flow (perm)		3508						4341	1362			
Volume (vph)	84	384	0	0	0	0	241	1544	1059	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	89	409	0	0	0	0	246	1576	1081	0	0	0
Lane Group Flow (vph)	0	498	0	0	0	0	0	2218	685	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4						2				
Permitted Phases	4						2		2			
Actuated Green, G (s)		17.0						66.0	66.0			
Effective Green, g (s)		16.5						65.5	65.5			
Actuated g/C Ratio		0.18						0.73	0.73			
Clearance Time (s)		3.5						3.5	3.5			
Lane Grp Cap (vph)		643						3159	991			
v/s Ratio Prot												
v/s Ratio Perm		c0.14						c0.51	0.50			
v/c Ratio		0.77						0.70	0.69			
Uniform Delay, d1		35.0						6.8	6.7			
Progression Factor		1.00						0.77	0.77			
Incremental Delay, d2		8.8						0.8	2.5			
Delay (s)		43.8						6.1	7.7			
Level of Service		D						A	A			
Approach Delay (s)		43.8			0.0			6.5			0.0	
Approach LOS		D			A			A			A	

Intersection Summary			
HCM Average Control Delay	11.9	HCM Level of Service	B
HCM Volume to Capacity ratio	0.72		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	75.8%	ICU Level of Service	C
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	
Lane Util. Factor		0.86						0.91		1.00	0.91	
Frt		0.99						0.99		1.00	1.00	
Flt Protected		1.00						1.00		0.95	1.00	
Satd. Flow (prot)		6325						4722		1770	4746	
Flt Permitted		1.00						1.00		0.11	1.00	
Satd. Flow (perm)		6325						4722		213	4746	
Volume (vph)	69	1345	109	0	0	0	0	1927	68	65	1396	0
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	73	1416	115	0	0	0	0	2095	74	74	1586	0
Lane Group Flow (vph)	0	1604	0	0	0	0	0	2169	0	74	1586	0
Turn Type	Perm									D.P+P		
Protected Phases		4						6		5	2	
Permitted Phases	4									6		
Actuated Green, G (s)		36.0						36.0		44.0	47.0	
Effective Green, g (s)		36.0						35.0		42.0	46.0	
Actuated g/C Ratio		0.40						0.39		0.47	0.51	
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		2530						1836		221	2426	
v/s Ratio Prot								c0.46		0.03	c0.33	
v/s Ratio Perm		c0.25								0.13		
v/c Ratio		0.63						1.18		0.33	0.65	
Uniform Delay, d1		21.7						27.5		39.9	16.2	
Progression Factor		1.16						1.18		0.27	0.19	
Incremental Delay, d2		0.9						82.2		2.5	0.9	
Delay (s)		26.0						114.5		13.1	3.9	
Level of Service		C						F		B	A	
Approach Delay (s)		26.0			0.0			114.5			4.4	
Approach LOS		C			A			F			A	

Intersection Summary			
HCM Average Control Delay	54.7	HCM Level of Service	D
HCM Volume to Capacity ratio	0.86		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	88.8%	ICU Level of Service	D
c Critical Lane Group			

Existing Lane Configuration- 2025 with Project

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)				4.0	4.0						4.0	
Lane Util. Factor				0.91	0.91						0.86	
Frpb, ped/bikes				1.00	1.00						1.00	
Flpb, ped/bikes				0.78	0.90						1.00	
Frt				1.00	1.00						1.00	
Flt Protected				0.95	0.98						1.00	
Satd. Flow (prot)				1248	2932						5963	
Flt Permitted				0.95	0.98						1.00	
Satd. Flow (perm)				1248	2932						5963	
Volume (vph)	0	0	0	854	506	0	0	0	0	1	1839	36
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	938	556	0	0	0	0	1	1999	39
Lane Group Flow (vph)	0	0	0	469	1025	0	0	0	0	0	2039	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type				Perm						Perm		
Protected Phases					8						6	
Permitted Phases				8						6		
Actuated Green, G (s)				23.0	23.0						30.0	
Effective Green, g (s)				22.5	22.5						29.5	
Actuated g/C Ratio				0.38	0.38						0.49	
Clearance Time (s)				3.5	3.5						3.5	
Lane Grp Cap (vph)				468	1100						2932	
v/s Ratio Prot												
v/s Ratio Perm				c0.38	0.35						c0.34	
v/c Ratio				1.00	0.99dl						0.70	
Uniform Delay, d1				18.8	18.0						11.8	
Progression Factor				1.00	1.00						1.00	
Incremental Delay, d2				42.1	15.0						1.4	
Delay (s)				60.9	33.0						13.2	
Level of Service				E	C						B	
Approach Delay (s)		0.0			41.8			0.0			13.2	
Approach LOS		A			D			A			B	

Intersection Summary				
HCM Average Control Delay	25.3	HCM Level of Service	C	
HCM Volume to Capacity ratio	0.83			
Cycle Length (s)	60.0	Sum of lost time (s)	8.0	
Intersection Capacity Utilization	64.7%	ICU Level of Service	B	

dl Defacto Left Lane. Recode with 1 though lane as a left lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)					4.0	4.0		4.0				
Lane Util. Factor					0.86	0.86		0.91				
Frpb, ped/bikes					0.90	0.69		1.00				
Flpb, ped/bikes					1.00	1.00		1.00				
Frt					0.95	0.85		1.00				
Flt Protected					1.00	1.00		1.00				
Satd. Flow (prot)					4061	935		4734				
Flt Permitted					1.00	1.00		1.00				
Satd. Flow (perm)					4061	935		4734				
Volume (vph)	0	0	0	0	1219	1149	91	1624	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	0	0	0	0	1257	1185	94	1674	0	0	0	0
Lane Group Flow (vph)	0	0	0	0	1849	593	0	1768	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type						Perm	Perm					
Protected Phases					8			2				
Permitted Phases						8	2					
Actuated Green, G (s)					41.0	41.0		41.0				
Effective Green, g (s)					41.0	41.0		41.0				
Actuated g/C Ratio					0.46	0.46		0.46				
Clearance Time (s)					4.0	4.0		4.0				
Lane Grp Cap (vph)					1850	426		2157				
v/s Ratio Prot					0.46							
v/s Ratio Perm						c0.63		c0.37				
v/c Ratio					1.30dr	1.39		0.82				
Uniform Delay, d1					24.5	24.5		21.3				
Progression Factor					0.19	0.20		0.85				
Incremental Delay, d2					6.2	177.7		2.4				
Delay (s)					10.9	182.8		20.6				
Level of Service					B	F		C				
Approach Delay (s)		0.0			52.7			20.6			0.0	
Approach LOS		A			D			C			A	

Intersection Summary				
HCM Average Control Delay	39.2	HCM Level of Service	D	
HCM Volume to Capacity ratio	1.11			
Cycle Length (s)	90.0	Sum of lost time (s)	8.0	
Intersection Capacity Utilization	97.6%	ICU Level of Service	E	

dr Defacto Right Lane. Recode with 1 though lane as a right lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)					4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor					0.86	0.86	0.97	0.91			0.91	
Frpb, ped/bikes					1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes					0.98	1.00	1.00	1.00			1.00	
Frt					1.00	0.85	1.00	1.00			1.00	
Flt Protected					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)					4717	935	3204	4746			4733	
Flt Permitted					1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)					4717	935	3204	4746			4733	
Volume (vph)	0	0	0	94	1723	301	475	1609	0	0	1488	28
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	0	98	1795	314	505	1712	0	0	1583	30
Lane Group Flow (vph)	0	0	0	0	1893	314	505	1712	0	0	1613	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type				Perm		Perm	Prot			Perm		
Protected Phases					8		5	2			6	
Permitted Phases				8		8				6		
Actuated Green, G (s)					30.0	30.0	7.5	52.0			41.0	
Effective Green, g (s)					30.5	30.5	7.0	51.5			40.5	
Actuated g/C Ratio					0.34	0.34	0.08	0.57			0.45	
Clearance Time (s)					4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)					1599	317	249	2716			2130	
v/s Ratio Prot							c0.16	0.36			c0.34	
v/s Ratio Perm					c0.40	0.34						
v/c Ratio					1.18	0.99	2.03	0.63			0.76	
Uniform Delay, d1					29.8	29.6	41.5	12.9			20.6	
Progression Factor					0.71	0.73	1.00	1.00			1.00	
Incremental Delay, d2					86.8	36.6	476.5	1.1			2.6	
Delay (s)					108.0	58.1	518.0	14.0			23.2	
Level of Service					F	E	F	B			C	
Approach Delay (s)		0.0			100.9			128.8			23.2	
Approach LOS		A			F			F			C	

Intersection Summary				
HCM Average Control Delay	90.4	HCM Level of Service	F	
HCM Volume to Capacity ratio	1.04			
Cycle Length (s)	90.0	Sum of lost time (s)	12.0	
Intersection Capacity Utilization	129.1%	ICU Level of Service	H	

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			1.00					1.00	0.86	0.86
Frt		0.97			1.00					1.00	0.99	0.85
Flt Protected		1.00			0.98					0.95	1.00	1.00
Satd. Flow (prot)		1811			1828					1770	4459	1318
Flt Permitted		1.00			0.79					0.95	1.00	1.00
Satd. Flow (perm)		1811			1466					1770	4459	1318
Volume (vph)	0	117	30	127	210	0	0	0	0	262	1688	587
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	127	33	138	228	0	0	0	0	285	1835	638
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	160	0	0	366	0	0	0	0	285	1911	562
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			4					6	6	6
Permitted Phases				4								
Actuated Green, G (s)		15.0			15.0					37.0	37.0	37.0
Effective Green, g (s)		15.0			15.0					37.0	37.0	37.0
Actuated g/C Ratio		0.25			0.25					0.62	0.62	0.62
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		453			367					1092	2750	813
v/s Ratio Prot		0.09								0.16	c0.43	0.43
v/s Ratio Perm					c0.25							
v/c Ratio		0.35			1.00					0.26	0.69	0.69
Uniform Delay, d1		18.5			22.5					5.3	7.7	7.7
Progression Factor		1.00			1.00					1.00	1.00	1.00
Incremental Delay, d2		2.2			46.3					0.6	1.5	4.8
Delay (s)		20.7			68.8					5.8	9.2	12.5
Level of Service		C			E					A	A	B
Approach Delay (s)		20.7			68.8			0.0			9.5	
Approach LOS		C			E			A			A	

Intersection Summary			
HCM Average Control Delay	16.7	HCM Level of Service	B
HCM Volume to Capacity ratio	0.78		
Actuated Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	77.5%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

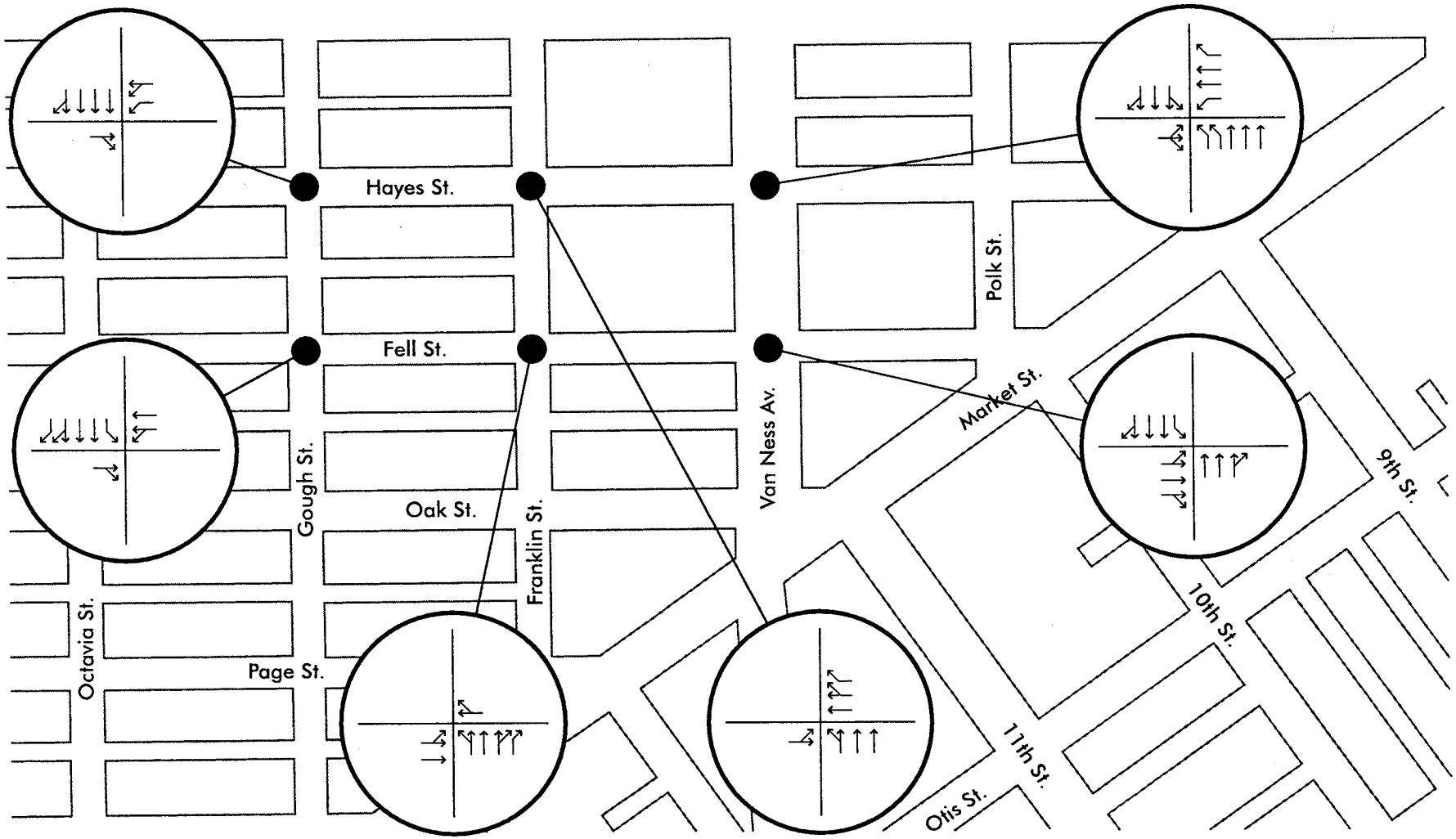
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0						4.0	4.0			
Lane Util. Factor		0.95						0.86	0.86			
Frt		1.00						0.97	0.85			
Flt Protected		0.99						0.99	1.00			
Satd. Flow (prot)		3508						4339	1362			
Flt Permitted		0.99						0.99	1.00			
Satd. Flow (perm)		3508						4339	1362			
Volume (vph)	84	384	0	0	0	0	243	1583	1091	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	89	409	0	0	0	0	248	1615	1113	0	0	0
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	498	0	0	0	0	0	2279	697	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4						2				
Permitted Phases	4						2		2			
Actuated Green, G (s)		17.0						66.0	66.0			
Effective Green, g (s)		16.5						65.5	65.5			
Actuated g/C Ratio		0.18						0.73	0.73			
Clearance Time (s)		3.5						3.5	3.5			
Lane Grp Cap (vph)		643						3158	991			
v/s Ratio Prot												
v/s Ratio Perm		0.14						0.53	0.51			
v/c Ratio		0.77						0.72	0.70			
Uniform Delay, d1		35.0						7.0	6.8			
Progression Factor		1.00						0.76	0.77			
Incremental Delay, d2		8.8						0.9	2.6			
Delay (s)		43.8						6.2	7.8			
Level of Service		D						A	A			
Approach Delay (s)		43.8			0.0			6.6			0.0	
Approach LOS		D			A			A			A	

Intersection Summary			
HCM Average Control Delay	11.9	HCM Level of Service	B
HCM Volume to Capacity ratio	0.73		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	75.8%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	
Lane Util. Factor		0.86						0.91		1.00	0.91	
Frt		0.98						0.99		1.00	1.00	
Flt Protected		1.00						1.00		0.95	1.00	
Satd. Flow (prot)		6282						4722		1770	4746	
Flt Permitted		1.00						1.00		0.11	1.00	
Satd. Flow (perm)		6282						4722		201	4746	
Volume (vph)	75	1345	185	0	0	0	0	1955	68	115	1448	0
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	79	1416	195	0	0	0	0	2125	74	131	1645	0
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	1690	0	0	0	0	0	2199	0	131	1645	0
Turn Type	Perm									D.P+P		
Protected Phases		4						6		5	2	
Permitted Phases	4									6		
Actuated Green, G (s)		36.0						38.0		46.0	49.0	
Effective Green, g (s)		36.0						37.0		44.0	48.0	
Actuated g/C Ratio		0.39						0.40		0.48	0.52	
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		2458						1899		216	2476	
v/s Ratio Prot								c0.47		0.05	c0.35	
v/s Ratio Perm		0.27								0.24		
v/c Ratio		0.69						1.16		0.61	0.66	
Uniform Delay, d1		23.3						27.5		42.4	16.1	
Progression Factor		1.00						1.00		1.00	1.00	
Incremental Delay, d2		1.6						77.5		12.0	1.4	
Delay (s)		24.9						105.0		54.4	17.5	
Level of Service		C						F		D	B	
Approach Delay (s)		24.9			0.0			105.0			20.3	
Approach LOS		C			A			F			C	

Intersection Summary			
HCM Average Control Delay	54.5	HCM Level of Service	D
HCM Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	92.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	92.9%	ICU Level of Service	F
Analysis Period (min)	15		
c Critical Lane Group			

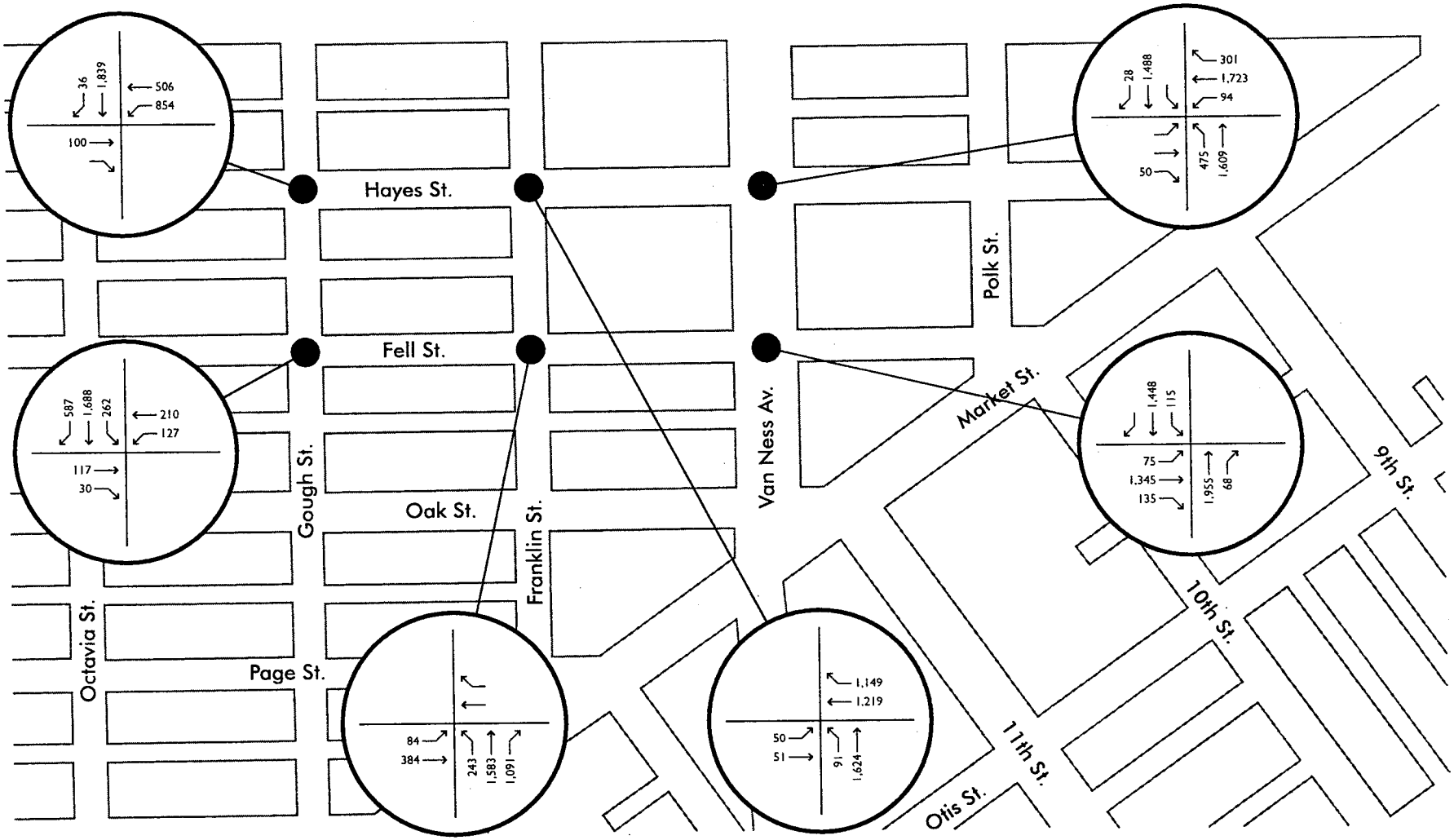
Project Lane Configuration- 2025 with Project



NORTH
NOT TO SCALE

ENGINEERS
PLANNERS
ECONOMISTS
Wilbur Smith Associates

Figure 2
2025 WITH PROJECT LANE CONFIGURATIONS
372351/BASE - 03/23/06



NORTH
NOT TO SCALE

Figure 3
2025 WITH PROJECT - TRAFFIC VOLUMES WEEKDAY PM PEAK HOUR
372351/BASE - 03/23/06

ENGINEERS
PLANNERS
ECONOMISTS
Wilbur Smith Associates

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0		4.0	4.0						4.0	
Lane Util. Factor		1.00		0.95	0.95						0.86	
Frpb, ped/bikes		1.00		1.00	1.00						1.00	
Flpb, ped/bikes		1.00		0.81	0.92						1.00	
Frt		1.00		1.00	1.00						1.00	
Flt Protected		1.00		0.95	0.98						1.00	
Satd. Flow (prot)		1863		1356	1550						5963	
Flt Permitted		1.00		0.69	0.82						1.00	
Satd. Flow (perm)		1863		980	1290						5963	
Volume (vph)	0	100	0	854	506	0	0	0	0	1	1839	36
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	109	0	938	556	0	0	0	0	1	1999	39
Lane Group Flow (vph)	0	109	0	543	951	0	0	0	0	0	2039	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type				Perm						Perm		
Protected Phases		4			8						6	
Permitted Phases				8						6		
Actuated Green, G (s)		22.5		23.0	23.0						30.0	
Effective Green, g (s)		22.5		22.5	22.5						29.5	
Actuated g/C Ratio		0.38		0.38	0.38						0.49	
Clearance Time (s)		4.0		3.5	3.5						3.5	
Lane Grp Cap (vph)		699		368	484						2932	
v/s Ratio Prot		0.06										
v/s Ratio Perm				0.55	c0.74						c0.34	
v/c Ratio		0.16		1.48	1.96						0.70	
Uniform Delay, d1		12.4		18.8	18.8						11.8	
Progression Factor		1.00		1.00	1.00						1.00	
Incremental Delay, d2		0.5		228.2	441.6						1.4	
Delay (s)		12.9		247.0	460.4						13.2	
Level of Service		B		F	F						B	
Approach Delay (s)		12.9			382.8			0.0			13.2	
Approach LOS		B			F			A			B	

Intersection Summary			
HCM Average Control Delay	164.8	HCM Level of Service	F
HCM Volume to Capacity ratio	1.25		
Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	83.6%	ICU Level of Service	D
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0			4.0	4.0		4.0				
Lane Util. Factor		1.00			0.91	0.91		0.91				
Frpb, ped/bikes		1.00			0.90	0.69		1.00				
Flpb, ped/bikes		1.00			1.00	1.00		1.00				
Frt		1.00			0.95	0.85		1.00				
Flt Protected		0.98			1.00	1.00		1.00				
Satd. Flow (prot)		1818			2846	989		4734				
Flt Permitted		0.26			1.00	1.00		1.00				
Satd. Flow (perm)		478			2846	989		4734				
Volume (vph)	50	51	0	0	1219	1149	91	1624	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	54	55	0	0	1257	1185	94	1674	0	0	0	0
Lane Group Flow (vph)	0	109	0	0	1849	593	0	1768	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type	Perm					Perm	Perm					
Protected Phases		4			8			2				
Permitted Phases	4					8	2					
Actuated Green, G (s)		41.0			41.0	41.0		41.0				
Effective Green, g (s)		41.0			41.0	41.0		41.0				
Actuated g/C Ratio		0.46			0.46	0.46		0.46				
Clearance Time (s)		4.0			4.0	4.0		4.0				
Lane Grp Cap (vph)		218			1297	451		2157				
v/s Ratio Prot					c0.65							
v/s Ratio Perm		0.23				0.60		c0.37				
v/c Ratio		0.50			1.43	1.31		0.82				
Uniform Delay, d1		17.3			24.5	24.5		21.3				
Progression Factor		1.00			0.22	0.20		0.86				
Incremental Delay, d2		8.0			191.9	143.2		2.4				
Delay (s)		25.2			197.4	148.0		20.7				
Level of Service		C			F	F		C				
Approach Delay (s)		25.2			185.4			20.7			0.0	
Approach LOS		C			F			C			A	

Intersection Summary			
HCM Average Control Delay	113.9	HCM Level of Service	F
HCM Volume to Capacity ratio	1.12		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	114.3%	ICU Level of Service	G
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)		4.0		4.0	4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor		1.00		1.00	0.95	1.00	0.97	0.91			0.91	
Frpb, ped/bikes		0.69		1.00	1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes		1.00		0.71	1.00	1.00	1.00	1.00			1.00	
Frt		0.86		1.00	1.00	0.85	1.00	1.00			1.00	
Flt Protected		1.00		0.95	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)		1106		1265	3539	1087	3204	4746			4733	
Flt Permitted		1.00		0.72	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)		1106		961	3539	1087	3204	4746			4733	
Volume (vph)	0	0	50	94	1723	301	475	1609	0	0	1488	28
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	54	98	1795	314	505	1712	0	0	1583	30
Lane Group Flow (vph)	0	54	0	98	1795	314	505	1712	0	0	1613	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type	Perm			Perm		Perm	Prot			Perm		
Protected Phases		4			8		5	2			6	
Permitted Phases	4			8		8				6		
Actuated Green, G (s)		30.5		30.0	30.0	30.0	7.5	52.0			41.0	
Effective Green, g (s)		30.5		30.5	30.5	30.5	7.0	51.5			40.5	
Actuated g/C Ratio		0.34		0.34	0.34	0.34	0.08	0.57			0.45	
Clearance Time (s)		4.0		4.5	4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)		375		326	1199	368	249	2716			2130	
v/s Ratio Prot		0.05			c0.51		c0.16	0.36			c0.34	
v/s Ratio Perm				0.10		0.29						
v/c Ratio		0.14		0.30	1.50	0.85	2.03	0.63			0.76	
Uniform Delay, d1		20.7		21.9	29.8	27.7	41.5	12.9			20.6	
Progression Factor		1.00		1.00	1.00	1.00	1.00	1.00			1.00	
Incremental Delay, d2		0.7		2.4	228.1	21.5	476.5	1.1			2.6	
Delay (s)		21.4		24.3	257.9	49.1	518.0	14.0			23.2	
Level of Service		C		C	F	D	F	B			C	
Approach Delay (s)		21.4			217.8			128.8			23.2	
Approach LOS		C			F			F			C	

Intersection Summary			
HCM Average Control Delay	132.1	HCM Level of Service	F
HCM Volume to Capacity ratio	1.16		
Cycle Length (s)	90.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	137.1%	ICU Level of Service	H

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			0.95					1.00	0.86	0.86
Frt		0.97			1.00					1.00	1.00	0.85
Flt Protected		1.00			0.98					0.95	1.00	1.00
Satd. Flow (prot)		1811			3474					1770	4482	1318
Flt Permitted		1.00			0.78					0.95	1.00	1.00
Satd. Flow (perm)		1811			2754					1770	4482	1318
Volume (vph)	0	117	30	127	210	0	0	0	0	262	1688	587
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	127	33	138	228	0	0	0	0	285	1835	638
Lane Group Flow (vph)	0	160	0	0	366	0	0	0	0	285	1845	628
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			4					6	6	6
Permitted Phases				4								
Actuated Green, G (s)		15.0			15.0					37.0	37.0	37.0
Effective Green, g (s)		15.0			15.0					37.0	37.0	37.0
Actuated g/C Ratio		0.25			0.25					0.62	0.62	0.62
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		453			689					1092	2764	813
v/s Ratio Prot		0.09								0.16	0.41	c0.48
v/s Ratio Perm					c0.13							
v/c Ratio		0.35			0.53					0.26	0.67	0.77
Uniform Delay, d1		18.5			19.5					5.3	7.5	8.4
Progression Factor		1.00			1.00					0.83	1.09	1.09
Incremental Delay, d2		2.2			2.9					0.1	0.1	0.7
Delay (s)		20.7			22.4					4.4	8.3	9.8
Level of Service		C			C					A	A	A
Approach Delay (s)		20.7			22.4			0.0			8.2	
Approach LOS		C			C			A			A	

Intersection Summary			
HCM Average Control Delay	10.4	HCM Level of Service	B
HCM Volume to Capacity ratio	0.70		
Cycle Length (s)	60.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	75.2%	ICU Level of Service	C

c Critical Lane Group

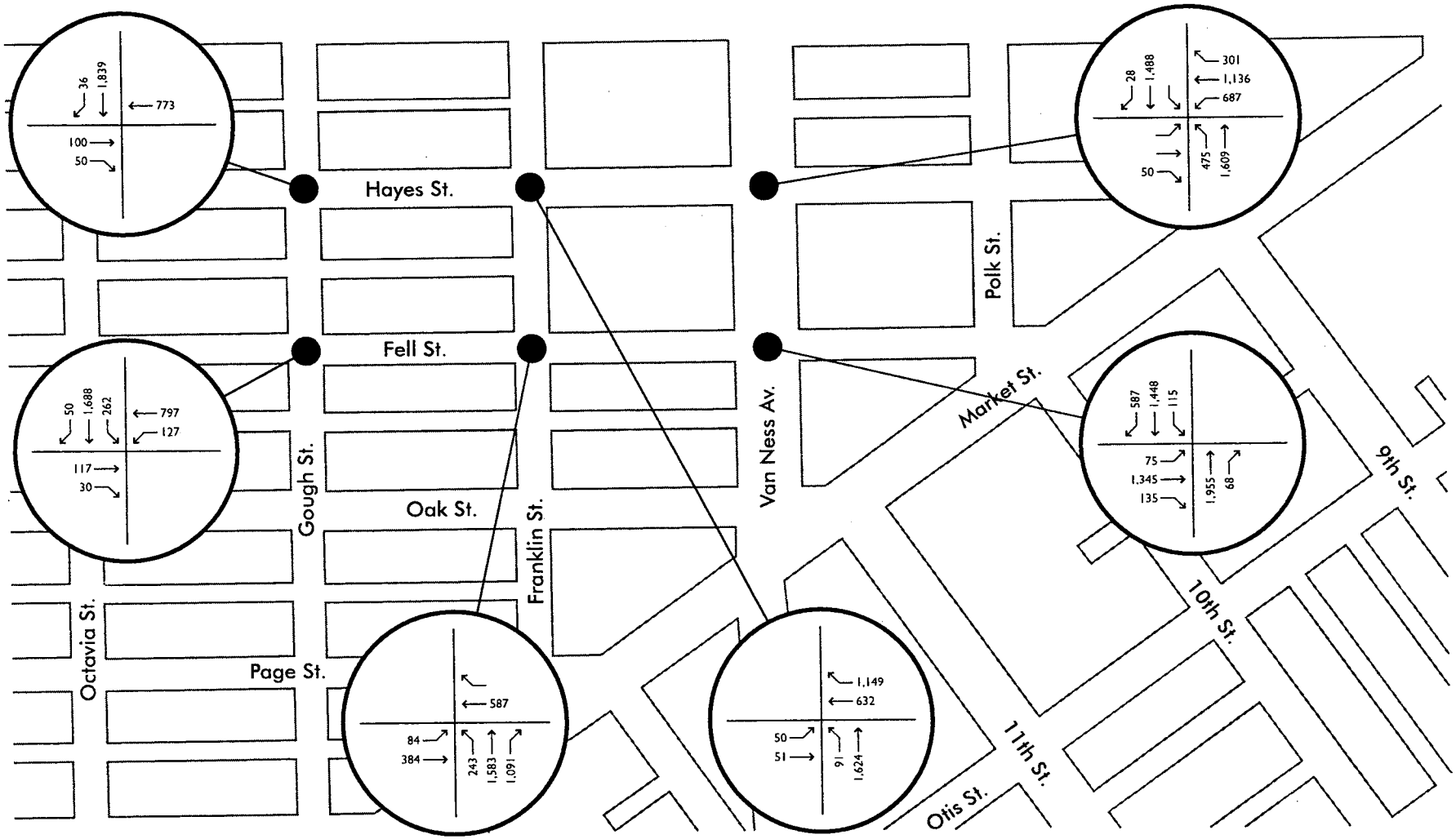
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0						4.0	4.0			
Lane Util. Factor		1.00						0.86	0.86			
Frt		1.00						0.97	0.85			
Flt Protected		0.99						0.99	1.00			
Satd. Flow (prot)		1846						4340	1362			
Flt Permitted		0.94						0.99	1.00			
Satd. Flow (perm)		1746						4340	1362			
Volume (vph)	84	384	0	0	0	0	243	1583	1091	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	89	409	0	0	0	0	248	1615	1113	0	0	0
Lane Group Flow (vph)	0	498	0	0	0	0	0	2274	702	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4			8			2				
Permitted Phases	4						2		2			
Actuated Green, G (s)		17.0						66.0	66.0			
Effective Green, g (s)		16.5						65.5	65.5			
Actuated g/C Ratio		0.18						0.73	0.73			
Clearance Time (s)		3.5						3.5	3.5			
Lane Grp Cap (vph)		320						3159	991			
v/s Ratio Prot												
v/s Ratio Perm		c0.29						c0.52	0.52			
v/c Ratio		1.56						0.72	0.71			
Uniform Delay, d1		36.8						7.0	6.9			
Progression Factor		1.00						0.78	0.78			
Incremental Delay, d2		265.2						0.9	2.6			
Delay (s)		301.9						6.3	8.0			
Level of Service		F						A	A			
Approach Delay (s)		301.9			0.0			6.7			0.0	
Approach LOS		F			A			A			A	

Intersection Summary			
HCM Average Control Delay	49.0	HCM Level of Service	D
HCM Volume to Capacity ratio	0.89		
Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	88.1%	ICU Level of Service	D
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	
Lane Util. Factor		0.91						0.91		1.00	0.91	
Frt		0.99						0.99		1.00	1.00	
Flt Protected		1.00						1.00		0.95	1.00	
Satd. Flow (prot)		5007						4722		1770	4746	
Flt Permitted		1.00						1.00		0.11	1.00	
Satd. Flow (perm)		5007						4722		199	4746	
Volume (vph)	75	1345	135	0	0	0	0	1955	68	115	1448	0
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	79	1416	142	0	0	0	0	2125	74	131	1645	0
Lane Group Flow (vph)	0	1637	0	0	0	0	0	2199	0	131	1645	0
Turn Type	Perm									D.P+P		
Protected Phases		4						6		5	2	
Permitted Phases	4									6		
Actuated Green, G (s)		35.5						38.5		46.5	49.5	
Effective Green, g (s)		35.5						37.5		44.5	48.5	
Actuated g/C Ratio		0.39						0.41		0.48	0.53	
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		1932						1925		216	2502	
v/s Ratio Prot								c0.47		0.05	c0.35	
v/s Ratio Perm		c0.33								0.25		
v/c Ratio		0.85						1.14		0.61	0.66	
Uniform Delay, d1		25.8						27.3		42.4	15.7	
Progression Factor		1.00						1.00		1.00	1.00	
Incremental Delay, d2		4.8						70.8		12.0	1.4	
Delay (s)		30.6						98.1		54.4	17.1	
Level of Service		C						F		D	B	
Approach Delay (s)		30.6			0.0			98.1			19.9	
Approach LOS		C			A			F			B	

Intersection Summary			
HCM Average Control Delay	53.6	HCM Level of Service	D
HCM Volume to Capacity ratio	0.94		
Cycle Length (s)	92.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	92.1%	ICU Level of Service	E
c Critical Lane Group			

Project Lane Configuration- 2025 with Project Diversion



NORTH
NOT TO SCALE

Wilbur Smith Associates
ENGINEERS
PLANNERS
ECONOMISTS

Figure 4

2025 WITH PROJECT DIVERSION-TRAFFIC VOLUMES WEEKDAY PM PEAK HOUR

372351/BASE - 03/23/06

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0						4.0	
Lane Util. Factor		1.00			0.95						0.86	
Frpb, ped/bikes		1.00			1.00						1.00	
Flpb, ped/bikes		1.00			1.00						1.00	
Frt		0.96			1.00						1.00	
Flt Protected		1.00			1.00						1.00	
Satd. Flow (prot)		1779			1720						5963	
Flt Permitted		1.00			1.00						1.00	
Satd. Flow (perm)		1779			1720						5963	
Volume (vph)	0	100	50	0	773	0	0	0	0	0	1839	36
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	109	54	0	849	0	0	0	0	0	1999	39
RTOR Reduction (vph)	0	0	0	0	0	0	0	0	0	0	3	0
Lane Group Flow (vph)	0	163	0	0	849	0	0	0	0	0	2035	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type				Perm								
Protected Phases		4			8						6	
Permitted Phases				8								
Actuated Green, G (s)		46.5			46.5						36.5	
Effective Green, g (s)		46.0			46.0						36.0	
Actuated g/C Ratio		0.51			0.51						0.40	
Clearance Time (s)		3.5			3.5						3.5	
Lane Grp Cap (vph)		909			879						2385	
v/s Ratio Prot		0.09			c0.49						c0.34	
v/s Ratio Perm												
v/c Ratio		0.18			0.97						0.85	
Uniform Delay, d1		11.8			21.2						24.6	
Progression Factor		1.00			1.62						1.00	
Incremental Delay, d2		0.4			16.4						4.1	
Delay (s)		12.3			50.7						28.7	
Level of Service		B			D						C	
Approach Delay (s)		12.3			50.7			0.0			28.7	
Approach LOS		B			D			A			C	

Intersection Summary			
HCM Average Control Delay	34.0	HCM Level of Service	C
HCM Volume to Capacity ratio	0.92		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	74.6%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0			4.0	4.0		4.0				
Lane Util. Factor		1.00			0.91	0.91		0.91				
Frpb, ped/bikes		1.00			0.85	0.69		1.00				
Flpb, ped/bikes		1.00			1.00	1.00		1.00				
Frt		1.00			0.93	0.85		1.00				
Flt Protected		0.98			1.00	1.00		1.00				
Satd. Flow (prot)		1818			2625	989		4734				
Flt Permitted		0.45			1.00	1.00		1.00				
Satd. Flow (perm)		831			2625	989		4734				
Volume (vph)	50	51	0	0	632	1149	91	1624	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	54	55	0	0	652	1185	94	1674	0	0	0	0
RTOR Reduction (vph)	0	0	0	0	1	1	0	0	0	0	0	0
Lane Group Flow (vph)	0	109	0	0	1243	592	0	1768	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type	Perm					Perm	Perm					
Protected Phases		4			8			2				
Permitted Phases	4					8	2					
Actuated Green, G (s)		48.0			48.0	48.0		34.0				
Effective Green, g (s)		48.0			48.0	48.0		34.0				
Actuated g/C Ratio		0.53			0.53	0.53		0.38				
Clearance Time (s)		4.0			4.0	4.0		4.0				
Lane Grp Cap (vph)		443			1400	527		1788				
v/s Ratio Prot					0.47							
v/s Ratio Perm		0.13				c0.60		0.37				
v/c Ratio		0.25			1.12dr	1.12		0.99				
Uniform Delay, d1		11.3			18.6	21.0		27.8				
Progression Factor		1.75			0.26	0.28		0.42				
Incremental Delay, d2		1.3			0.9	58.2		8.1				
Delay (s)		21.0			5.8	64.2		19.6				
Level of Service		C			A	E		B				
Approach Delay (s)		21.0			24.7			19.6			0.0	
Approach LOS		C			C			B			A	

Intersection Summary			
HCM Average Control Delay	22.2	HCM Level of Service	C
HCM Volume to Capacity ratio	1.07		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	112.7%	ICU Level of Service	H
Analysis Period (min)	15		

dr Defacto Right Lane. Recode with 1 though lane as a right lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)		4.0		4.0	4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor		1.00		1.00	0.95	1.00	0.97	0.91			0.91	
Frpb, ped/bikes		0.69		1.00	1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes		1.00		1.00	1.00	1.00	1.00	1.00			1.00	
Frt		0.86		1.00	1.00	0.85	1.00	1.00			1.00	
Flt Protected		1.00		0.95	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)		1106		1770	3539	1087	3204	4746			4733	
Flt Permitted		1.00		0.95	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)		1106		1770	3539	1087	3204	4746			4733	
Volume (vph)	0	0	50	687	1136	301	475	1609	0	0	1488	28
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	54	716	1183	314	505	1712	0	0	1583	30
RTOR Reduction (vph)	0	50	0	0	0	101	0	0	0	0	2	0
Lane Group Flow (vph)	0	4	0	716	1183	213	505	1712	0	0	1611	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type	Split			Split		Perm	Prot					
Protected Phases	4	4		8	8		5	2			6	
Permitted Phases						8						
Actuated Green, G (s)		6.0		27.5	27.5	27.5	11.5	44.5			29.5	
Effective Green, g (s)		6.0		28.0	28.0	28.0	11.0	44.0			29.0	
Actuated g/C Ratio		0.07		0.31	0.31	0.31	0.12	0.49			0.32	
Clearance Time (s)		4.0		4.5	4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)		74		551	1101	338	392	2320			1525	
v/s Ratio Prot		c0.00		c0.40	0.33		c0.16	0.36			c0.34	
v/s Ratio Perm						0.20						
v/c Ratio		0.05		1.30	1.07	0.63	1.29	0.74			1.06	
Uniform Delay, d1		39.3		31.0	31.0	26.6	39.5	18.4			30.5	
Progression Factor		1.00		0.73	0.73	0.67	0.49	0.05			1.00	
Incremental Delay, d2		1.2		142.7	44.1	5.2	131.5	0.2			39.6	
Delay (s)		40.5		165.2	66.7	23.1	150.8	1.0			70.1	
Level of Service		D		F	E	C	F	A			E	
Approach Delay (s)		40.5			92.4			35.2			70.1	
Approach LOS		D			F			D			E	

Intersection Summary				
HCM Average Control Delay	65.2	HCM Level of Service	E	
HCM Volume to Capacity ratio	1.10			
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	16.0	
Intersection Capacity Utilization	102.4%	ICU Level of Service	G	
Analysis Period (min)	15			

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			0.95					1.00	0.86	0.86
Frt		0.97			1.00					1.00	1.00	0.85
Flt Protected		1.00			0.99					0.95	1.00	1.00
Satd. Flow (prot)		1811			3515					1770	4485	1318
Flt Permitted		1.00			0.87					0.95	1.00	1.00
Satd. Flow (perm)		1811			3067					1770	4485	1318
Volume (vph)	0	117	30	127	797	0	0	0	0	262	1688	50
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	127	33	138	866	0	0	0	0	285	1835	54
RTOR Reduction (vph)	0	3	0	0	0	0	0	0	0	0	0	28
Lane Group Flow (vph)	0	157	0	0	1004	0	0	0	0	285	1835	26
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			4					6	6	6
Permitted Phases				4								
Actuated Green, G (s)		39.0			39.0					43.0	43.0	43.0
Effective Green, g (s)		39.0			39.0					43.0	43.0	43.0
Actuated g/C Ratio		0.43			0.43					0.48	0.48	0.48
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		785			1329					846	2143	630
v/s Ratio Prot		0.09								0.16	c0.41	0.02
v/s Ratio Perm					c0.33							
v/c Ratio		0.20			0.76					0.34	0.86	0.04
Uniform Delay, d1		15.8			21.5					14.6	20.8	12.5
Progression Factor		1.00			1.23					0.11	0.36	0.04
Incremental Delay, d2		0.6			2.6					0.6	2.8	0.1
Delay (s)		16.4			29.0					2.2	10.3	0.6
Level of Service		B			C					A	B	A
Approach Delay (s)		16.4			29.0			0.0			9.0	
Approach LOS		B			C			A			A	

Intersection Summary			
HCM Average Control Delay	15.4	HCM Level of Service	B
HCM Volume to Capacity ratio	0.81		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	81.2%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

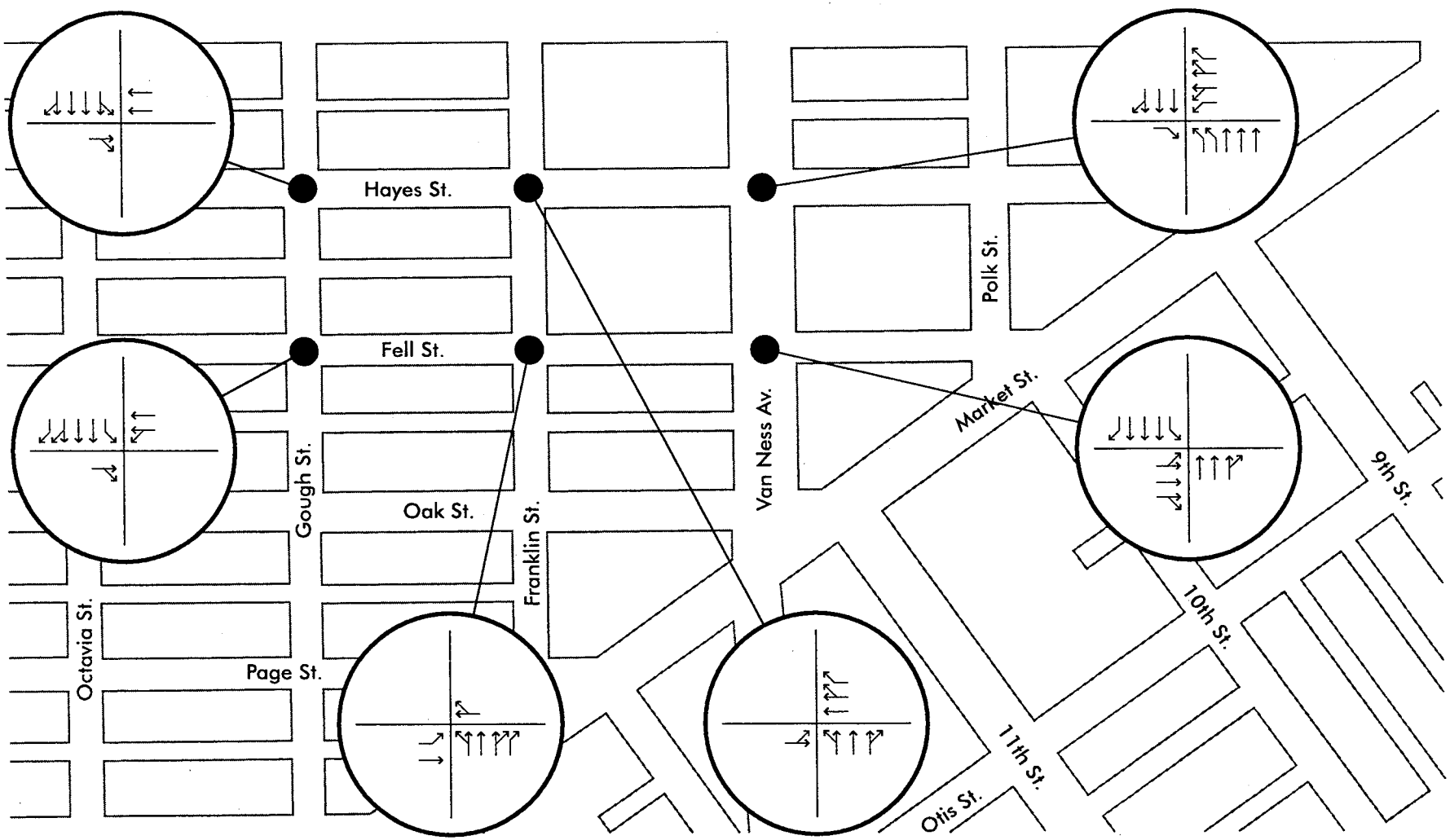
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0			4.0			4.0	4.0			
Lane Util. Factor		1.00			1.00			0.86	0.86			
Frt		1.00			1.00			0.98	0.85			
Flt Protected		0.99			1.00			0.99	1.00			
Satd. Flow (prot)		1846			1863			4367	1362			
Flt Permitted		0.41			1.00			0.99	1.00			
Satd. Flow (perm)		769			1863			4367	1362			
Volume (vph)	84	384	0	0	587	0	243	1583	1091	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	89	409	0	0	638	0	248	1615	1113	0	0	0
RTOR Reduction (vph)	0	0	0	0	0	0	0	22	159	0	0	0
Lane Group Flow (vph)	0	498	0	0	638	0	0	2142	653	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4			8			2				
Permitted Phases	4						2		2			
Actuated Green, G (s)		38.5			38.0			44.5	44.5			
Effective Green, g (s)		38.0			38.0			44.0	44.0			
Actuated g/C Ratio		0.42			0.42			0.49	0.49			
Clearance Time (s)		3.5			4.0			3.5	3.5			
Lane Grp Cap (vph)		325			787			2135	666			
v/s Ratio Prot					0.34							
v/s Ratio Perm		c0.65						0.49	0.48			
v/c Ratio		1.53			0.81			1.00	0.98			
Uniform Delay, d1		26.0			22.8			23.0	22.6			
Progression Factor		1.50			1.61			1.08	1.17			
Incremental Delay, d2		254.3			4.1			15.9	22.9			
Delay (s)		293.3			40.9			40.9	49.3			
Level of Service		F			D			D	D			
Approach Delay (s)		293.3			40.9			43.2			0.0	
Approach LOS		F			D			D			A	

Intersection Summary			
HCM Average Control Delay	73.1	HCM Level of Service	E
HCM Volume to Capacity ratio	1.25		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	120.7%	ICU Level of Service	H
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	
Lane Util. Factor		0.91						0.91		1.00	0.91	
Frt		0.99						0.99		1.00	0.96	
Flt Protected		1.00						1.00		0.95	1.00	
Satd. Flow (prot)		5007						4722		1770	4541	
Flt Permitted		1.00						1.00		0.09	1.00	
Satd. Flow (perm)		5007						4722		169	4541	
Volume (vph)	75	1345	135	0	0	0	0	1955	68	115	1448	587
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	79	1416	142	0	0	0	0	2125	74	131	1645	667
RTOR Reduction (vph)	0	12	0	0	0	0	0	4	0	0	81	0
Lane Group Flow (vph)	0	1625	0	0	0	0	0	2195	0	131	2231	0
Turn Type	Perm									pm+pt		
Protected Phases		4						6		5	2	
Permitted Phases	4									2		
Actuated Green, G (s)		32.0						41.0		51.0	51.0	
Effective Green, g (s)		32.0						40.0		50.0	50.0	
Actuated g/C Ratio		0.36						0.44		0.56	0.56	
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		1780						2099		201	2523	
v/s Ratio Prot								c0.46		0.04	c0.49	
v/s Ratio Perm		0.32								0.32		
v/c Ratio		0.91						1.05		0.65	0.88	
Uniform Delay, d1		27.7						25.0		36.1	17.5	
Progression Factor		1.02						1.00		0.64	0.43	
Incremental Delay, d2		0.9						22.2		1.5	0.5	
Delay (s)		29.0						47.3		24.5	7.9	
Level of Service		C						D		C	A	
Approach Delay (s)		29.0			0.0			47.3			8.8	
Approach LOS		C			A			D			A	

Intersection Summary			
HCM Average Control Delay	27.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.96		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	86.5%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Project Lane Configuration with Geometric Changes - 2025 with Project Diversion



NORTH
NOT TO SCALE

ENGINEERS
PLANNERS
ECONOMISTS
Wilbur Smith Associates

Figure 5
2025 WITH PROJECT DIVERSION - ADDITIONAL GEOMETRIC CHANGES
372351/BASE - 03/23/06

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0						4.0	
Lane Util. Factor		1.00			0.95						0.86	
Frpb, ped/bikes		1.00			1.00						1.00	
Flpb, ped/bikes		1.00			1.00						1.00	
Frt		0.96			1.00						1.00	
Flt Protected		1.00			1.00						1.00	
Satd. Flow (prot)		1779			3490						5963	
Flt Permitted		1.00			1.00						1.00	
Satd. Flow (perm)		1779			3490						5963	
Volume (vph)	0	100	50	0	773	0	0	0	0	0	1839	36
Peak-hour factor, PHF	0.92	0.92	0.92	0.91	0.91	0.91	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	109	54	0	849	0	0	0	0	0	1999	39
RTOR Reduction (vph)	0	3	0	0	0	0	0	0	0	0	3	0
Lane Group Flow (vph)	0	160	0	0	849	0	0	0	0	0	2035	0
Confl. Peds. (#/hr)				200								
Bus Blockages (#/hr)	0	0	0	0	7	0	0	0	0	0	0	0
Turn Type												
Protected Phases		4			8						6	
Permitted Phases												
Actuated Green, G (s)		36.0			36.5						46.5	
Effective Green, g (s)		36.0			36.0						46.0	
Actuated g/C Ratio		0.40			0.40						0.51	
Clearance Time (s)		4.0			3.5						3.5	
Lane Grp Cap (vph)		712			1396						3048	
v/s Ratio Prot		0.09			c0.24						c0.34	
v/s Ratio Perm												
v/c Ratio		0.22			0.61						0.67	
Uniform Delay, d1		17.8			21.4						16.3	
Progression Factor		1.00			1.56						1.00	
Incremental Delay, d2		0.7			1.2						1.2	
Delay (s)		18.5			34.6						17.5	
Level of Service		B			C						B	
Approach Delay (s)		18.5			34.6			0.0			17.5	
Approach LOS		B			C			A			B	

Intersection Summary			
HCM Average Control Delay	22.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.64		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	55.3%	ICU Level of Service	B
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)		4.0			4.0	4.0		4.0				
Lane Util. Factor		1.00			0.91	0.91		0.91				
Frpb, ped/bikes		1.00			0.85	0.69		1.00				
Flpb, ped/bikes		1.00			1.00	1.00		1.00				
Frt		1.00			0.93	0.85		1.00				
Flt Protected		0.98			1.00	1.00		1.00				
Satd. Flow (prot)		1818			2625	989		4734				
Flt Permitted		0.45			1.00	1.00		1.00				
Satd. Flow (perm)		831			2625	989		4734				
Volume (vph)	50	51	0	0	632	1149	91	1624	0	0	0	0
Peak-hour factor, PHF	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97	0.92	0.92	0.92
Adj. Flow (vph)	54	55	0	0	652	1185	94	1674	0	0	0	0
RTOR Reduction (vph)	0	0	0	0	1	1	0	0	0	0	0	0
Lane Group Flow (vph)	0	109	0	0	1243	592	0	1768	0	0	0	0
Confl. Peds. (#/hr)	200		200	200		200						
Bus Blockages (#/hr)	0	0	0	0	10	0	0	0	0	0	0	0
Turn Type	Perm					Perm	Perm					
Protected Phases		4			8			2				
Permitted Phases	4					8	2					
Actuated Green, G (s)		48.0			48.0	48.0		34.0				
Effective Green, g (s)		48.0			48.0	48.0		34.0				
Actuated g/C Ratio		0.53			0.53	0.53		0.38				
Clearance Time (s)		4.0			4.0	4.0		4.0				
Lane Grp Cap (vph)		443			1400	527		1788				
v/s Ratio Prot					0.47							
v/s Ratio Perm		0.13				c0.60		0.37				
v/c Ratio		0.25			1.12dr	1.12		0.99				
Uniform Delay, d1		11.3			18.6	21.0		27.8				
Progression Factor		1.23			0.26	0.30		0.42				
Incremental Delay, d2		1.3			2.6	63.0		9.6				
Delay (s)		15.2			7.5	69.2		21.4				
Level of Service		B			A	E		C				
Approach Delay (s)		15.2			27.4			21.4			0.0	
Approach LOS		B			C			C			A	

Intersection Summary			
HCM Average Control Delay	24.2	HCM Level of Service	C
HCM Volume to Capacity ratio	1.07		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	112.7%	ICU Level of Service	H
Analysis Period (min)	15		

dr Defacto Right Lane. Recode with 1 though lane as a right lane.
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	10	10	12	12	10	12
Total Lost time (s)			4.0	4.0	4.0	4.0	4.0	4.0			4.0	
Lane Util. Factor			1.00	0.91	0.86	0.91	0.97	0.91			0.91	
Frpb, ped/bikes			0.93	1.00	1.00	0.69	1.00	1.00			1.00	
Flpb, ped/bikes			1.00	1.00	1.00	1.00	1.00	1.00			1.00	
Frt			0.86	1.00	1.00	0.85	1.00	1.00			1.00	
Flt Protected			1.00	0.95	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (prot)			1497	1610	3194	989	3204	4746			4733	
Flt Permitted			1.00	0.95	1.00	1.00	0.95	1.00			1.00	
Satd. Flow (perm)			1497	1610	3194	989	3204	4746			4733	
Volume (vph)	0	0	50	687	1136	301	475	1609	0	0	1488	28
Peak-hour factor, PHF	0.92	0.92	0.92	0.96	0.96	0.96	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	0	0	54	716	1183	314	505	1712	0	0	1583	30
RTOR Reduction (vph)	0	0	0	0	0	10	0	0	0	0	2	0
Lane Group Flow (vph)	0	0	54	635	1264	304	505	1712	0	0	1611	0
Confl. Peds. (#/hr)	200		200	200		200						
Turn Type			Free	Split		Perm	Prot					
Protected Phases				8	8		5	2			6	
Permitted Phases			Free			8						
Actuated Green, G (s)			90.0	31.5	31.5	31.5	16.5	50.5			30.5	
Effective Green, g (s)			90.0	32.0	32.0	32.0	16.0	50.0			30.0	
Actuated g/C Ratio			1.00	0.36	0.36	0.36	0.18	0.56			0.33	
Clearance Time (s)				4.5	4.5	4.5	3.5	3.5			3.5	
Lane Grp Cap (vph)			1497	572	1136	352	570	2637			1578	
v/s Ratio Prot				0.39	c0.40		c0.16	0.36			c0.34	
v/s Ratio Perm			0.04			0.31						
v/c Ratio			0.04	1.11	1.11	0.86	0.89	0.65			1.02	
Uniform Delay, d1			0.0	29.0	29.0	27.0	36.1	13.9			30.0	
Progression Factor			1.00	0.71	0.71	0.74	0.55	0.06			1.00	
Incremental Delay, d2			0.0	64.1	58.7	15.3	7.1	0.4			28.1	
Delay (s)			0.0	84.8	79.3	35.1	27.0	1.2			58.1	
Level of Service			A	F	E	D	C	A			E	
Approach Delay (s)		0.0			74.6			7.1			58.1	
Approach LOS		A			E			A			E	

Intersection Summary				
HCM Average Control Delay	45.0	HCM Level of Service	D	
HCM Volume to Capacity ratio	1.03			
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	12.0	
Intersection Capacity Utilization	98.9%	ICU Level of Service	F	
Analysis Period (min)	15			

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	12	12	12	10	12
Total Lost time (s)		4.0			4.0					4.0	4.0	4.0
Lane Util. Factor		1.00			0.95					1.00	0.86	0.86
Frt		0.97			1.00					1.00	1.00	0.85
Flt Protected		1.00			0.99					0.95	1.00	1.00
Satd. Flow (prot)		1811			3515					1770	4485	1318
Flt Permitted		1.00			0.87					0.95	1.00	1.00
Satd. Flow (perm)		1811			3067					1770	4485	1318
Volume (vph)	0	117	30	127	797	0	0	0	0	262	1584	104
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	127	33	138	866	0	0	0	0	285	1722	113
RTOR Reduction (vph)	0	5	0	0	0	0	0	0	0	0	0	40
Lane Group Flow (vph)	0	155	0	0	1004	0	0	0	0	285	1722	73
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	8
Turn Type				Perm						Split		Prot
Protected Phases		4			8					6	6	6
Permitted Phases				8								
Actuated Green, G (s)		39.0			39.0					43.0	43.0	43.0
Effective Green, g (s)		39.0			39.0					43.0	43.0	43.0
Actuated g/C Ratio		0.43			0.43					0.48	0.48	0.48
Clearance Time (s)		4.0			4.0					4.0	4.0	4.0
Lane Grp Cap (vph)		785			1329					846	2143	630
v/s Ratio Prot		0.09								0.16	c0.38	0.06
v/s Ratio Perm					c0.33							
v/c Ratio		0.20			0.76					0.34	0.80	0.12
Uniform Delay, d1		15.8			21.5					14.6	19.9	13.0
Progression Factor		1.00			1.21					0.13	0.31	0.04
Incremental Delay, d2		0.6			2.6					0.8	2.6	0.3
Delay (s)		16.4			28.6					2.7	8.7	0.8
Level of Service		B			C					A	A	A
Approach Delay (s)		16.4			28.6			0.0			7.5	
Approach LOS		B			C			A			A	

Intersection Summary			
HCM Average Control Delay	14.4	HCM Level of Service	B
HCM Volume to Capacity ratio	0.78		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	79.6%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	12	12
Total Lost time (s)	4.0	4.0			4.0			4.0	4.0			
Lane Util. Factor	1.00	1.00			1.00			0.86	0.86			
Frt	1.00	1.00			1.00			0.98	0.85			
Flt Protected	0.95	1.00			1.00			0.99	1.00			
Satd. Flow (prot)	1770	1863			1863			4367	1362			
Flt Permitted	0.15	1.00			1.00			0.99	1.00			
Satd. Flow (perm)	279	1863			1863			4367	1362			
Volume (vph)	84	384	0	0	587	0	243	1583	1091	0	0	0
Peak-hour factor, PHF	0.94	0.94	0.94	0.92	0.92	0.92	0.98	0.98	0.98	0.92	0.92	0.92
Adj. Flow (vph)	89	409	0	0	638	0	248	1615	1113	0	0	0
RTOR Reduction (vph)	0	0	0	0	0	0	0	22	159	0	0	0
Lane Group Flow (vph)	89	409	0	0	638	0	0	2142	653	0	0	0
Turn Type	Perm						Perm		Perm			
Protected Phases		4			8			2				
Permitted Phases	4						2		2			
Actuated Green, G (s)	38.5	38.5			38.0			44.5	44.5			
Effective Green, g (s)	38.0	38.0			38.0			44.0	44.0			
Actuated g/C Ratio	0.42	0.42			0.42			0.49	0.49			
Clearance Time (s)	3.5	3.5			4.0			3.5	3.5			
Lane Grp Cap (vph)	118	787			787			2135	666			
v/s Ratio Prot		0.22			c0.34							
v/s Ratio Perm	0.32							0.49	0.48			
v/c Ratio	0.75	0.52			0.81			1.00	0.98			
Uniform Delay, d1	22.0	19.2			22.8			23.0	22.6			
Progression Factor	1.45	1.47			1.27			1.08	1.17			
Incremental Delay, d2	34.9	2.4			8.2			15.9	22.9			
Delay (s)	67.0	30.7			37.3			40.9	49.3			
Level of Service	E	C			D			D	D			
Approach Delay (s)		37.2			37.3			43.2			0.0	
Approach LOS		D			D			D			A	

Intersection Summary			
HCM Average Control Delay	41.5	HCM Level of Service	D
HCM Volume to Capacity ratio	0.91		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	110.1%	ICU Level of Service	H
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	12	12	12	12	12	12	12	10	12	12	10	12
Total Lost time (s)		4.0						4.0		4.0	4.0	4.0
Lane Util. Factor		0.91						0.91		1.00	0.91	1.00
Frt		0.99						0.99		1.00	1.00	0.85
Flt Protected		1.00						1.00		0.95	1.00	1.00
Satd. Flow (prot)		5007						4722		1770	4746	1583
Flt Permitted		1.00						1.00		0.08	1.00	1.00
Satd. Flow (perm)		5007						4722		155	4746	1583
Volume (vph)	75	1345	135	0	0	0	0	1955	68	115	1448	587
Peak-hour factor, PHF	0.95	0.95	0.95	0.92	0.92	0.92	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	79	1416	142	0	0	0	0	2125	74	131	1645	667
RTOR Reduction (vph)	0	13	0	0	0	0	0	4	0	0	0	0
Lane Group Flow (vph)	0	1624	0	0	0	0	0	2195	0	131	1645	667
Turn Type	Perm									pm+pt		Free
Protected Phases		4						6		5	2	
Permitted Phases	4									2		Free
Actuated Green, G (s)		30.0						45.0		53.0	53.0	90.0
Effective Green, g (s)		30.0						44.0		52.0	52.0	90.0
Actuated g/C Ratio		0.33						0.49		0.58	0.58	1.00
Clearance Time (s)		4.0						3.0		3.0	3.0	
Lane Grp Cap (vph)		1669						2309		161	2742	1583
v/s Ratio Prot								c0.46		0.04	c0.35	
v/s Ratio Perm		0.32								0.43		0.42
v/c Ratio		0.97						0.95		0.81	0.60	0.42
Uniform Delay, d1		29.6						22.0		34.5	12.3	0.0
Progression Factor		0.84						0.85		0.72	0.40	1.00
Incremental Delay, d2		11.4						1.3		10.7	0.2	0.2
Delay (s)		36.5						20.0		35.7	5.2	0.2
Level of Service		D						C		D	A	A
Approach Delay (s)		36.5			0.0			20.0			5.5	
Approach LOS		D			A			C			A	

Intersection Summary			
HCM Average Control Delay	18.6	HCM Level of Service	B
HCM Volume to Capacity ratio	0.91		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	8.0
Intersection Capacity Utilization	86.5%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			