



RESPONSES TO COMMENTS on the Draft EIR

1500 Mission Street Project

PLANNING DEPARTMENT
CASE NO. 2014-000362ENV

STATE CLEARINGHOUSE NO. 2015052040



SAN FRANCISCO
PLANNING
DEPARTMENT

	Draft EIR Publication Date:	November 9, 2016
	Draft EIR Public Hearing Date:	December 15, 2016
	Draft EIR Public Comment Period:	November 9, 2016–January 4, 2017
	Final EIR Certification Date:	March 23, 2017

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: **March 9, 2017**

TO: **Members of the Planning Commission and Interested Parties**

FROM: **Lisa M. Gibson, Acting Environmental Review Officer**

Re: **Attached Responses to Comments on Draft Environmental Impact Report:
Case No. 2014-000362ENV for the 1500 Mission Street Project**

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Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on March 23, 2017.** The Planning Commission will receive public testimony on the Final EIR certification at the March 23, 2017, hearing. Please note that the public review period for the Draft EIR ended on January 4, 2017; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Responses to Comments document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Michael Li at (415) 575-9107 or michael.j.li@sfgov.org.

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

RESPONSES TO COMMENTS on the Draft Environmental Impact Report

1500 Mission Street Project

PLANNING DEPARTMENT
CASE NO. **2014-000362ENV**

STATE CLEARINGHOUSE NO. 2015052040



SAN FRANCISCO
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ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT

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A. Introduction

A.1 Purpose of the Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (Draft EIR) for the proposed 1500 Mission Street Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resource Code Section 21091(d)(2)(A) and (B), the Planning Department has considered the comments received on the Draft EIR, evaluated the issues raised and is providing written responses that address each substantive environmental issue that has been raised by the commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. Such effects include physical impacts or changes attributable to the project rather than any social or financial implications of the project. Therefore, this document focuses primarily on responding to comments that relate to physical environmental issues in compliance with CEQA.^a In addition, this RTC document includes text changes to the Draft EIR initiated by Planning Department staff.

None of the comments received provide new information that warrants recirculation of the Draft EIR. The comments do not identify new significant impacts or a substantial increase in the severity of previously identified impacts or feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR and/or that the project sponsor has not agreed to implement.

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

A.2 Environmental Review Processes

Notice of Preparation and Public Scoping

The San Francisco Planning Department, as lead agency responsible for administering the environmental review of projects within the City and County of San Francisco under CEQA, published a Notice of

^a State CEQA Guidelines (*California Code of Regulations*, Title 14, Division 6, Chapter 3), Sections 15064(c) and (d).

Preparation (NOP) of an Environmental Impact Report and Public Scoping Meeting on May 13, 2015, to inform agencies and the general public that the Draft EIR would be prepared based upon the criteria of the State CEQA Guidelines, Sections 15064 (Determining Significant Effect) and 15065 (Mandatory Findings of Significance). This notice was sent to applicable agencies and organizations, tenants of the project site, and addresses within a 300-foot radius of the project site.

Pursuant to CEQA Section 21083.9 and CEQA Guidelines Section 15206, a public scoping meeting was held to receive oral comments concerning the scope of the Draft EIR on June 2, 2015, at One South Van Ness Avenue, San Francisco, CA. Attendees were given the opportunity to provide written and oral comments.

Draft EIR Public Review

The San Francisco Planning Department published a Draft EIR for the proposed project on November 9, 2016, and circulated the Draft EIR to local, State, and federal agencies and to interested organizations and individuals for a 56-day public review period. Paper copies of the Draft EIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street, and Planning Information Counter, 1660 Mission Street and (2) the San Francisco Main Library, 100 Larkin Street.^b The Planning Department also distributed notices of availability of the Draft EIR; published notification of its availability in a newspaper of general circulation in San Francisco (San Francisco Examiner); posted the notice of availability at the San Francisco County Clerk's office; and posted notices at locations within the project area.

During the Draft EIR public review period, the Planning Department received comments from three public agencies and four organizations or individuals. Attachment A of this RTC document includes copies of the comment letters submitted during the Draft EIR public review period.

During the public review period, the Planning Department conducted a public hearing to receive oral comments before the San Francisco Planning Commission on December 15, 2016, at San Francisco City Hall. A court reporter present at the public hearings transcribed the oral comments verbatim and prepared written transcripts (see Attachment B).

Responses to Comments Document and Final EIR under CEQA

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

^b Electronic copies of the Draft EIR can be accessed online at <http://tinyurl.com/sfceqadocs> and <http://sf-moh.org/index.aspx?page=1314>.

specifies that the lead agency is required to respond to the comments on the major environmental issues raised in the comments received during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the Draft EIR in disclosing the significance of the environmental impacts of the proposed project that was evaluated in the Draft EIR.

The Planning Department distributed this RTC document for review to the San Francisco Planning Commission, as well as to the agencies, neighborhood organizations, and persons who commented on the Draft EIR. The Planning Commission will consider the adequacy of the Final EIR—consisting of the Draft EIR and the RTC document—in complying with the requirements of CEQA. If the Planning Commission finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR under CEQA and will then consider the associated MMRP and requested approvals for the proposed project.

Consistent with CEQA Guidelines Section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines Sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels and the project is approved, the findings must reject project alternatives and include a statement of overriding considerations for those impacts (CEQA Guidelines Section 15093(b)). The project sponsor is required to implement the MMRP as conditions of project approval.

A.3 Document Organization

This RTC document consists of the following sections, plus supplemental attachments, as described below:

- A. **Introduction** – This section discusses the purpose of the RTC document, the environmental review processes, and the organization of the RTC document.
- B. **List of Persons Commenting** – This section presents the names of persons who provided comments on the Draft EIR. The list is organized into the following groups: agencies, boards, and commissions; and organizations and individuals.
- C. **Comments and Responses** – This section presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. Similar comments are grouped together by topic area. Following each comment or group of comments on a topic are the City's responses.
- D. **Draft EIR Revisions** – This section includes all of the changes to the Draft EIR text and graphics and cites the page number where the change is made to the text or graphics.

Attachment A – Draft EIR Comment Letters

Attachment B – Draft EIR Hearing Transcript

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B. List of Persons Commenting

This RTC document responds to all comments received on the Draft EIR, including written comments submitted by letter, fax, or email, as well as written and oral comments presented at the public hearings. This section lists all agencies, organizations, and individuals who submitted comments on the Draft EIR. Commenters are grouped according to whether they commented as individuals or represented a public agency or non-governmental organization. **Table RTC-1, Persons Commenting on the Draft EIR**, lists the commenters' names, along with the corresponding commenter codes used in Section C, Comments and Responses, to denote each set of comments, the comment format, and the comment date. The complete set of written and oral comments received on the Draft EIR is provided in Attachment A, Draft EIR Comment Letters, and Attachment B, Draft EIR Hearing Transcript.

This RTC document codes the comments in the following way:

- Comments from agencies are designated by "A-" and the agency's name or acronym thereof.
- Comments from organizations are designated by "O-" and the organization's name or acronym thereof. In cases where several commenters from the same organization provided comments, the acronym is followed by the commenter's last name.
- Comments from individuals are designated by "I-" and the commenter's last name.

Each commenter is given an identifier, and each comment is numbered. Therefore, the second comment received from a representative of an organization known as "Friends of Friends" would be designated "O-FOF.2," while the third comment received from an individual named Smith would be designated "I-Smith.3." In this way, the reader can both locate a particular comment in a comment letter by referring to the comment designation.

B. List of Persons Commenting**TABLE RTC-1 PERSONS COMMENTING ON THE DRAFT EIR**

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Patricia Maurice, District Branch Chief, Local Development - Intergovernmental Review	California Department of Transportation (Caltrans)	Letter	December 8, 2016
A-HPC	Andrew Wolfram, President	San Francisco Historic Preservation Commission	Letter	December 14, 2016
A-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Hearing Transcript	December 15, 2016
Organizations				
O-Heritage	Mike Buhler, President and CEO	San Francisco Architectural Heritage	Letter	January 4, 2017
Individuals				
I-Hestor	Sue C. Hestor, Attorney at Law		Letters (2)	January 4, 2017
I-Hong	Dennis Hong		E-Mail	January 3, 2017
I-Rhine	Robert Rhine		E-Mail	December 6, 2016

C. Comments and Responses

This section presents the substantive comments received on the Draft EIR and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR, with general comments on the EIR, including comments on the merits of the proposed project and project alternatives, grouped together at the end of the section. Comments unrelated to a specific impact category are also classified as general comments. Comments on the Summary or specific mitigation measures are included under the comments regarding the relevant topical section of the Draft EIR. The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets):

Project Description [PD]	<i>Initial Study Topics</i>
Plans and Policies [PP]	Land Use [LU]
Cultural Resources [CR]	Population and Housing [PH]
Transportation and Circulation [TR]	
Wind [WI]	<i>Other CEQA Considerations [OC]</i>
Shadow [SH]	Aesthetics
Alternatives [AL]	Parking
	General Comments (GC)

Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, Project Description comments [PD] are listed as PD-1, PD-2, PD-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter's name and the comment code described in Section B of this RTC document. The reader is referred to Attachments A and B for the full text and context of each comment letter or e-mail, as well as the public hearing transcript. In those attachments, the comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the Draft EIR as appropriate. Response numbers correspond to the topic code; for example, the response to comment PD-1 is presented under Response PD-1. The responses may clarify the Draft EIR text or revise or add text to the EIR. Revisions to the Draft EIR are shown as indented text. New or revised text, including text changes initiated by Planning Department staff, is double underlined; deleted material is shown in ~~striketrough~~.

Footnotes included in written comments are numbered as in the original and thus may be non-consecutive. Footnotes to responses are indicated by consecutive letters.

C.1 Project Description

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment PD-1: Housing and Occupancy in the Proposed Residential Tower
- Comment PD-2: Project Approvals—General Plan Amendments
- Comment PD-3: Project Approvals Required from Caltrans

Comment PD-1: Housing and Occupancy in the Proposed Residential Tower

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

I-Hong.6

“Table 1-page 9 and Table 1-page 4:

- a. To be family friendly, can a few more three-bedroom units be added?
- b. In Table 1-page 9 it shows 560 units and Table 1-page 4 of the NOP ---- it shows 550 Units.
- c. Can the Table also show how many are BMR and etc.” (Dennis Hong; e-mail, January 3, 2017)

Response PD-1

The comment suggests that the proposed project provide more three-bedroom units, requests clarification concerning the total number of residential units proposed, and requests information concerning below-market-rate units.

The commenter’s suggestion for an increased number of three-bedroom units addresses the merits of the project and not the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Concerning the total number of residential units, the project sponsor changed the proposed number of units from 550 proposed units at the time of the NOP publication, in May 2015, to the current proposal of 560 units that was analyzed in the Draft EIR.

Regarding proposed below-market-rate (BMR) units, as noted in Table II-1, Draft EIR p. II-21, and in the Draft EIR text on p. II-23, 20 percent of the proposed 560 residential units would be affordable, which would total 112 on-site BMR units. As stated on p. II-23 of the Draft EIR, these units would be available to residents earning a maximum of 50 percent of the average median income.

Comment PD-2: Project Approvals—General Plan Amendments

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

I-Hestor.13

“Approvals Required DEIR II-36. There are General Plan amendments in this project, but they are not called out as such. Please add General Plan and its elements. Area Plans are part of the General Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PD-2

The comment states that the Draft EIR does not identify amendments to the *San Francisco General Plan* that would be required as part of approval of the proposed project.

The changes in the *San Francisco General Plan* area plan height maps are included in the list of project approvals on page II-36 of the Draft EIR. For clarification, the first bullet under “Board of Supervisors” is revised as follows (new text is double-underlined):

- Zoning Map amendments to change the site’s height and bulk district designations and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan.

Additionally, the first bullet under “Planning Commission” is revised as follows (new text is double-underlined):

- Zoning Map Amendment to alter the parcels’ height and bulk and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan (recommendation to the Board of Supervisors)

Also, the following text is added to the end of the second full paragraph on Draft EIR page III-12 (new text is double-underlined):

Approval of the proposed project would entail amendment of Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed building heights.

Finally, the following text is added to the end of the second paragraph under the heading “Market & Octavia Area Plan” on Draft EIR page III-13 (new text is double-underlined):

Approval of the proposed project would entail amendment of Map 3 (height districts) of the Market & Octavia Area Plan to accommodate the proposed building heights.

Comment PD-3: Project Approvals Required from Caltrans

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

A-Caltrans.4

“Transportation Permit. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a Transportation Permit that is issued by Caltrans. To apply, a completed Transportation Permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to:

“Caltrans Transportation Permits Office
1823 14th Street
Sacramento, CA 95811-7119

“See the following website for more information about Transportation Permits:
<http://www.dot.ca.gov/trafficops/permits/index.html>.

“**Encroachment Permit.** A Caltrans Encroachment Permit will be required for all temporary and permanent features and activities within State ROW. The proposed work within State ROW shall be designed to State standards and in accordance with the Encroachment and Utility Policy, as provided in Chapter 17 of the Project Development Procedures Manual. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed Encroachment Permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

“David Salladay, District Office Chief
Office of Permits, MS SE
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

“See the following website for more information: <http://www.dot.ca.gov/trafficops/ep/index.html>.

“**Design Exceptions.** The following project features do not meet State standards, and will not be permitted unless an exception is granted. Approval of these features should not be assumed, and appropriate alternatives should be planned in the case they are not approved:

- “• A wind canopy which encroaches five (5) feet into State ROW.
- “• Twenty-five (25) trees within the sidewalk along South Van Ness Avenue.
- “• Six (6) parklets comprised of seating areas and a wind screen (‘green wall’) within the sidewalk.
- “• Rows of tieback anchors for shoring the basement excavation which would be detensioned, but remain within State ROW after completion of construction.
- “• Use of a tower crane extending over State ROW during construction.
- “• Sidewalk used for construction staging and pedestrian walkways constructed in the curb lane.

“**Relinquishment.** The City recently requested that Caltrans relinquish sidewalks along Van Ness Avenue. Though the request has been filed, relinquishment is not complete until the related California Transportation Commission resolution is recorded. If the sidewalk that fronts the proposed development is relinquished to the City prior to the need for a permit, then those features affecting only the sidewalk will be within the City’s jurisdiction.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response PD-3

The comment notes that several approvals would be required from Caltrans, including a transportation permit for movement of oversized or excessive load vehicles on State roadways, for an encroachment permit for

temporary and permanent features and activities within the state right-of-way, and for design exceptions for project features that do not meet state standards.

These requirements noted by the commenter are Caltrans requirements that would be complied with, as applicable. The requirement for an encroachment permit is cited under project approvals on Draft EIR page II-38 because the project site fronts South Van Ness Avenue, which is a state roadway. Construction activity, such as a tower crane rotating above the state right-of-way and the installation of below-grade tiebacks into state right-of-way as part of the shoring required during excavation would be addressed under such a permit. The wind-baffling features referred to in the comment are addressed as a required entitlement on Draft EIR pages IV.D-3 and -4 as part of the encroachment permit and, which states that if these features were not approved, *Planning Code* Section 148 would require that the project be redesigned. However, as noted by the commenter, the City in 2016 requested that Caltrans relinquish sidewalks along Van Ness Avenue/South Van Ness Avenue from Lombard Street to Plum Street. The relinquishment has now been completed by both the City and the State of California, as described herein. Therefore, because the South Van Ness Avenue sidewalks are no longer under Caltrans jurisdiction, Caltrans approval would no longer be required for the wind-baffling features on and above the South Van Ness Avenue sidewalk (street trees, wind canopy, and wind screens and parklets). Caltrans approval also would not be required for use of the sidewalk for construction staging.

Regarding the South Van Ness Avenue sidewalk relinquishment, in June 2016, to facilitate implementation of the City's Better Streets Plan and various *San Francisco General Plan* objectives and policies, San Francisco Public Works formally requested the initiation of discussions with Caltrans regarding the transfer of ownership of the sidewalks along portions of Van Ness Avenue and South Van Ness Avenue from the state to the City.^c Following Caltrans' acceptance of the concept, the Board of Supervisors, in December 2016, approved and the Mayor signed, Ordinance No. 243-16, authorizing the City to accept the state's relinquishment of the sidewalks along portions of Van Ness Avenue (between Lombard Street and Market Street) and portions of South Van Ness Avenue (between Market Street and Plum Street), including the South Van Ness Avenue sidewalk adjacent to the project site. The state relinquishment required approval by the California Transportation Commission (CTC), which approved Resolution No. R-3970 on January 18, 2017, and the transfer of the sidewalks became effective January 27, 2017, with the recordation of a certified copy of the approved CTC resolution.

^c The City has been performing certain maintenance activities on state rights-of-way in San Francisco, including Van Ness Avenue (U.S. Highway 101 between Van Ness Avenue at Lombard Street and South Van Ness Avenue at 13th Street), since at least 1990 under an agreement with Caltrans.

C.2 Plans and Policies

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, Project Description, and Draft EIR Chapter III, *Plans and Policies*. These include topics related to:

- Comment PP-1: Planning Context for Proposed Project
- Comment PP-2: Consideration of *General Plan* Policies Concerning Views
- Comment PP-3: *General Plan* Amendments as Part of Project
- Comment PP-4: Height Limits
- Comment PP-5: Parking Requirements
- Comment PP-6: Housing Element Consistency
- Comment PP-7: Area Plan Consistency
- Comment PP-8: The Hub Plan
- Comment PP-9: Climate Action Plan Consistency
- Comment PP-10: Proposed Central SoMa Plan
- Comment PP-11: Zoning Map

Comment PP-1: Planning Context for Proposed Project

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

I-Hestor.2

“Two maps must be added to 1500 Mission DEIR

“Map #1

“A map showing the boundaries of the **Market/Octavia Area Plan** PLUS the boundaries of the **Eastern Neighborhoods Area Plan** with its **5 sub-area Plans** (including the **Western SoMa Area Plan**). The M/O plan should show sub-area Van Ness & Market Downtown Residential Special Use District.

“Superimpose on this Map the boundaries of the **proposed Central SoMa Area Plan, The Hub**, and all other Plans that have amended these Area Plans. This would include the **5M plan** at 5th & Market which amended part of the Eastern Neighborhood Area Plan. PLUS any **proposed** Map Amendments to either Market/Octavia or the Eastern Neighborhoods Plan, including those proposed in any pending PPA [Preliminary Project Assessment]. This is the proposed map amendment for One Oak/1500 Market. Also the requested height reclassification on the western end of One Oak/1500 Market block - at Franklin & Oak.

“This map is necessary

- “• To understand various discussions in the DEIR
- “• Show the changes/proposed changes to Market/Octavia Plan and Eastern Neighborhoods Plan
- “• Show how close the Mission Area Plan is to the boundary of the area analyzed in this EIR.

“For each Plan please provide the date of the adoption of that Plan by the City (I believe 4/17/08 for M/O and 12/19/08 for EN.) Further provide the dates of the community planning effort or its EIR. Western SoMa was the most recent of the Area Plans.

“Also for each of the areas and sub-areas please call out the amount of residential parking that it REQUIRED, if that parking is required at all.”

...

“Map of Projects – Figure IV-1 - the map goes straight up to the Mission Area Plan boundaries (13th/Duboce). It shows the relevance of projects in the Mission Plan area to this site.” (Sue C. Hestor; letter, January 4, 2017)

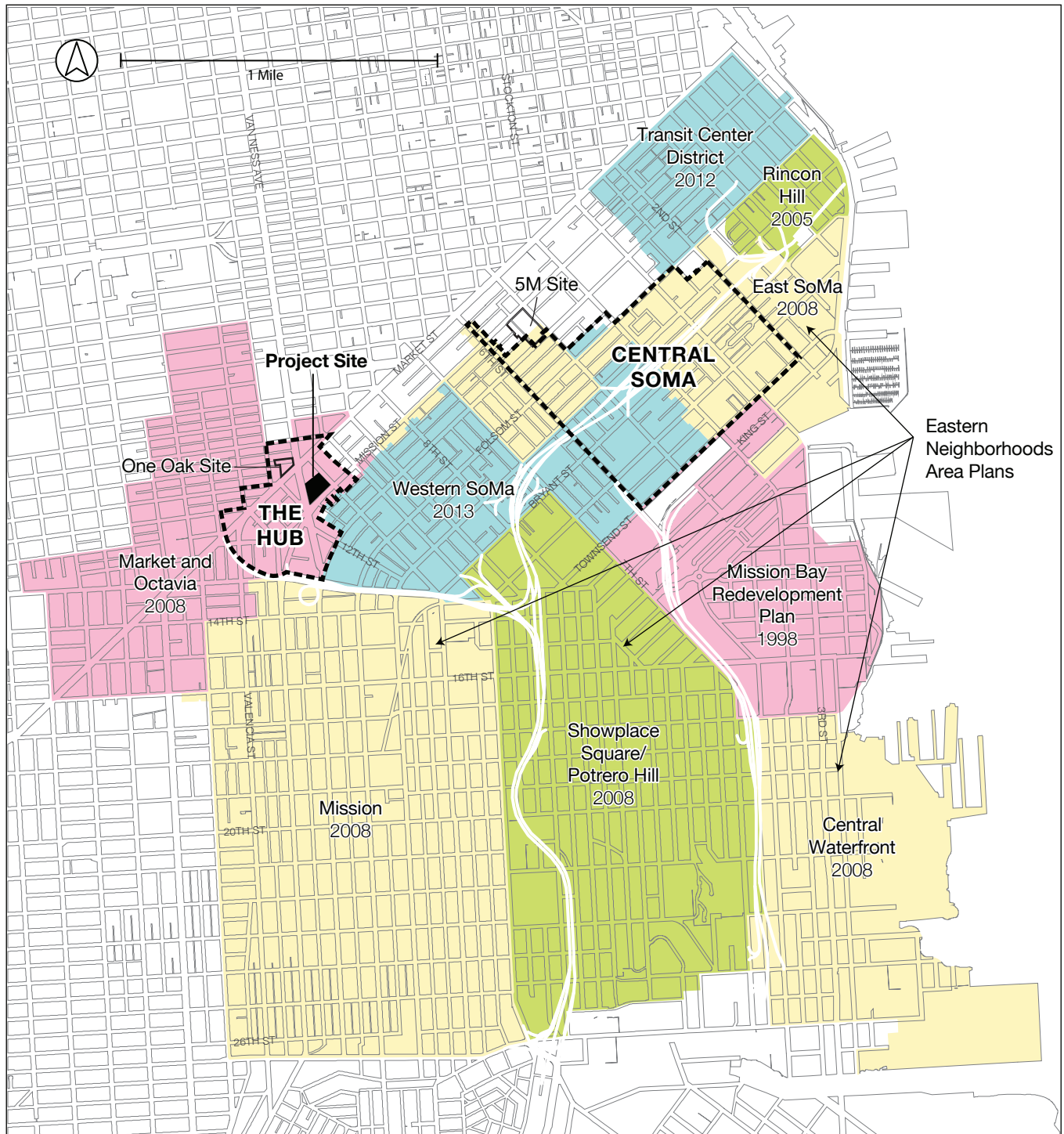
Response PP-1

The comment requests further information, including a map, concerning recent planning efforts in the project vicinity, including those for the Market & Octavia area, Eastern Neighborhoods, and Western SoMa, to provide context for the proposed project.

Figure RTC-1, Recently Adopted Area Plans in and near the 1500 Mission Street Project Site Vicinity, page RTC-14, depicts the recently adopted area plans, including the Market & Octavia Area Plan (adopted in 2008), the four Eastern Neighborhoods plans (Mission, Showplace Square/Potrero Hill, Central Waterfront, East SoMa) (adopted in 2008), the Western SoMa Plan (adopted in 2013), Rincon Hill Plan (updated plan adopted in 2005), and Transit Center District Plan (adopted in 2012). The figure also shows the area of the proposed Central SoMa Plan and the area covered by the proposed Hub planning effort. The nearby-proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) site is also shown, as is the approved 5M Project site. Each of these plans contains parking maximums, rather than parking minimums.

While the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) would require a *General Plan* amendment to modify the Height Districts map in the Market & Octavia Area Plan, as well as a corresponding change to the *Planning Code* height and bulk map, there would be no increase in the currently permitted height limit of 400 feet. Rather, the *General Plan* and zoning map changes would reduce the maximum height limit on one parcel (the east end of the One Oak site, at the corner of Oak and Market Streets; 2,750 square feet in area) from 400 feet to 120 feet and increase the maximum height limit from 120 feet to 400 feet on the western half of the parcel at the west end of the One Oak site (approximately 5,500 square feet in area).

The 5M Project (925–967 Mission Street; Case No. 2011.0409E), was approved in 2015 and included adoption of the Fifth and Mission Special Use District. The approval of the 5M project did not result in any boundary changes to the East SoMa Plan area maps, but instead resulted in the addition of a notation indicating, “The Fifth and Mission Special Use District area was not included in the Eastern Neighborhoods Area Plan, see Ordinance No. 299-08.” Six of the 20 parcels within the Special Use District are also within the East SoMa Plan area. Approval of the 5M Project also resulted in amendment of the *Planning Code* height and bulk maps to permit heights up to 450 feet, including 365 feet on the six parcels within the East SoMa Plan area.



SOURCE: San Francisco Planning Department

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-1
Recently Adopted Area Plans In and Near the 1500 Mission Street Project Site Vicinity

As noted above in response to Comment PD-2, approval of the proposed 1500 Mission Street project would require *General Plan* amendments in the form of amendment of Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan. The second requested map is discussed below under Transportation, Response TR-1.

Comment PP-2: Consideration of General Plan Policies Concerning Views

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

I-Hestor.12

I-Hestor.32

“Views of Project Site from south - looking up South Van Ness. **Figure II-22.** There used to be policies in the Master Plan dealing with the importance of view perspectives to give orientation to pedestrians, to vehicles, to people trying to zero in on a location. City Hall. Views of the dome of City Hall from Van Ness to the north and from streets to the south were considered important. They were to orient people - those heading to City Hall or civic center. Have those policies been removed from the General Plan? If they have not, please provide a before and after perspective of the view towards City Hall from the south. The dome is visible coming north on South Van Ness. Will it disappear from view? How far to the south.

...

“Aesthetics scoped out - page 23. See comments above about view toward City Hall dome from South Van Ness. Where the general plan has a policy of protecting certain views because they are important orientation points, I believe they are not merely ‘aesthetic.’ There is planning policy underlying them.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-2

These comments ask about *General Plan* policies concerning protection of certain views to allow orientation based on landmark locations, including City Hall and Civic Center.

Objective 1 of the Urban Design Element of the *San Francisco General Plan* (formerly the *Master Plan*) states “Emphasis of the characteristic pattern which gives to the city and its neighborhoods an image, a sense of purpose, and a means of orientation,” and the text that follows states, “San Francisco has an image and character in its city pattern which depend especially upon views, topography, streets, building form and major landscaping. This pattern gives an organization and sense of purpose to the city, denotes the extent and special nature of districts, and identifies and makes prominent the centers of human activity. The pattern also assists in orientation for travel on foot, by automobile and by public transportation. The city pattern should be recognized, protected and enhanced.”

Also, the introductory text under “City Pattern” states, “BUILDINGS AND STRUCTURES and clusters of them, which reflect the character of districts and centers for activity, provide reference points for human orientation, and may add to (but can detract from) topography and views.”

Urban Design Element Policy 1.8 states, “Increase the visibility of major destination areas and other points for orientation,” and the accompanying text states, “In travel about the city, the ability to see one's destination and other points of orientation is an important product of the city pattern. Such an ability should be fostered in public and private development.”

However, there are no policies in the Urban Design element that specifically reference visual orientation relative to City Hall. Moreover, concerning views of the City Hall dome, the proposed project would not obscure ground-level views of the dome from anywhere in the immediate project vicinity. The dome of City Hall is not visible from South Van Ness Avenue adjacent to the project site because of intervening buildings such as the 100 Van Ness Avenue building, which is approximately 400 feet in height (see **Figure RTC-2, Views Towards City Hall**, page RTC-85). In fact, the dome is only marginally visible from South Van Ness Avenue at all: the westernmost sliver of the lower part of the dome can be seen from the western part of the South Van Ness Avenue sidewalk at Market Street (southwest corner of Market and South Van Ness), although the shape of the dome is not apparent from this viewpoint because of the small amount of the dome that is visible (see **Figure RTC-2, Views Towards City Hall**, page RTC-85). For this reason, a photosimulation showing the view of the dome from South Van Ness Avenue is not necessary.

The project block of South Van Ness Avenue is indicated in the Urban Design Element as having street views of “average” quality and is not identified as being a “street area important to urban design and views.”

Comment PP-3: General Plan Amendments as Part of Project

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

I-Hestor.14

“Height and Bulk - DEIR III-4 Map Figure III-2. There is no discussion that this Map includes the site of One Oak/1500 Market which also has a height increase on Market. That change should be noted. The Map shows the hypocrisy of ignoring the sibling projects.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-3

The comment states that the Draft EIR does not depict proposed height limit changes on Figure III-2.

Draft EIR Figure III-2, Existing Height and Bulk District Map (as retitled herein), page III-5, depicts existing height and bulk districts. Accordingly, proposed changes to height and bulk districts are appropriately not shown on this figure. The Draft EIR states (page III-4) that the proposed project would exceed the existing height limit and explains, on page III-6, “The proposed project would be reviewed by the Planning Commission, which would make a recommendation to the Board of Supervisors on proposed Zoning Map amendments to adjust the height and bulk limit designations” to accommodate the proposed project. On page III-6, the Draft EIR also describes the proposed new height and bulk districts (130/240-R-3 and 130/400-R-3). Amendments to the *General Plan* (height maps in the Market & Octavia Area Plan and Downtown Plan) are discussed on Draft EIR pages III-12 and III-13, respectively, as modified herein.



Looking North on Van Ness Avenue from Southwest Corner of Market Street and South Van Ness Avenue



Looking North on South Van Ness Avenue from West Side of South Van Ness Across from Project Site

With regard to the comment requesting that the figure show the proposed project at One Oak Street, this is a separate project and is not the subject of this EIR. However, that project is included in the Draft EIR's cumulative analyses. As noted in the response to Comment PP-1, above, the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E), would seek modifications of the height map in the Market & Octavia Area Plan to shift the location of the proposed tower on the site; however, the entitlements are not proposing an increase in the existing height limit of 400 feet.

Comment PP-4: Height Limits

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

I-Hestor.15

“**Figure III-2** shows the vast difference in heights between the north and south sides of Mission. Please describe the intention of the heights on south side in the Western SoMa Plan. Also please label all streets.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-4

The comment cites Draft EIR Figure III-2, Existing Height and Bulk District Map (as retitled herein), Draft EIR page III-5, and notes that height limits differ greatly on the north and south sides of Mission Street.

As stated on Draft EIR page II-7, there is an eight-story City-owned office building north of the project site and a 22-story office building to the east, across 11th Street, while to the south, across Mission Street, are three- and five-story buildings.

The parcels along the south side of Mission Street, across from the project site, are within the C-3-G (Downtown General Commercial) Use District, which is the same as the project site. The parcels on the south side of Mission Street were rezoned to C-3-G in 2008, at the time that rezoning to implement the Market & Octavia Area Plan was approved. Additionally, as part of the adoption of the Market & Octavia Area Plan, the height limits on the parcels on the south side of Mission Street were reduced, from 130 feet to between 85 feet and 120 feet.

The Western SoMa Plan, adopted in 2013, encompasses the second line of parcels south of Mission Street (fronting on Minna Street), but not the parcels fronting Mission Street. The interior of the block across Mission Street from the project site, along parts of Minna, Natoma, and Lafayette Streets, is within a Residential Enclave District (RED). The RED, an Eastern Neighborhoods Mixed-Use District, is defined in *Planning Code* Section 813 as including “many of the clusters of low-scale, medium density, predominantly residential neighborhoods located along the narrow side streets of the South of Market area,” and the zoning controls are “intended to encourage and facilitate the development of attractive, compatible and economically feasible infill housing while providing adequate residential amenities to the site and neighborhood.” Accordingly, the height limit within RED is 40 feet, while the height limit along 10th and Howard Streets, which are also within the Western SoMa Mixed Use General (WMUG) Use District, is 55 feet, except at the corner of Howard and 12th Street, within the Moderate Scale Neighborhood Commercial Transit (NCT-3) Use District, where the height limit is 50 feet.

The above height limits and use districts are to be contrasted with the project block and the south side of Mission Street, which, as noted, are within the C-3-G district. This area, including the project site, is also within the Van Ness & Market Downtown Residential Special Use District (SUD), which, as stated in *Planning Code* Section 249.33, “is intended to be a transit-oriented, high-density, mixed-use neighborhood with a significant residential presence.” This includes the northwest corner of the block across Mission Street from the project site (southeast corner of Mission Street and South Van Ness Avenue, and extending a short distance down 12th Street); here, the height limit is 120 feet and, because of parcel configurations, this height limit extends all the way to Lafayette Street at Minna Street. Therefore, while the area within the RED Use District is intended to be “low-scale,” the area immediately to the north, including the project site, is intended to provide for much greater density of development. The south side of Mission Street, within the C-3-G Use District and the SUD, with its 85- to 120-foot height limits, effectively serves as a transitional zone between high-density development, such as the proposed project, and the RED along parts of Minna, Natoma, and Lafayette Streets.

Regarding street names, these have been added to revised Figure III-1 and Figure III-2. Additionally, for clarification, the word “Existing” is added to each figure’s title, so that the two figures are entitled, “Existing Zoning Map” and “Existing Height and Bulk District Map,” respectively. (The revised figures appear in this RTC, Section D, Draft EIR Revisions on pages RTC-84 and RTC-85, respectively). The revised figures replace those in the Draft EIR on pages III-3 and III-5, respectively.

Comment PP-5: Parking Requirements

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

I-Hestor.16

“**Discussion of parking requirements III-7** seems to be saying that there is ZERO auto parking required for residences on this site but there is REQUIRED bicycle parking. Meaning that bicycle travel is highly encouraged. If this is correct, why isn’t it stated so clearly? The amount of auto parking requires a CONDITIONAL USE. Which means that the amount of parking must be measured against the impacts on nearby residents (south of Mission) AND against the policies of the entire General Plan, including those of M/O and Eastern Neighborhoods. Why is an alternative without a CU not included?” (Sue C. Hestor; letter, January 4, 2017)

Response PP-5

The comment requests clarification concerning required auto and bicycle parking requirements. The comment also questions why an alternative is not included in the Draft EIR for a project that would not require a Conditional Use authorization, as is the case for the proposed project.

The commenter’s understanding of auto and bicycle parking requirements is correct: as stated on Draft EIR page III-7, “off-street parking for residential or commercial uses in the C 3 G district is not required.” Therefore, no automobile parking is required for the proposed project, including for all proposed uses including residential, office, or retail use, and, as stated on page III-8, “the residential and retail/restaurant parking component of the proposed project requires a Conditional Use Authorization and this requirement

will be included in *Planning Code* amendments to create the Mission and South Van Ness Special Use District.” Draft EIR page III-8 also sets forth the required bicycle parking for the proposed project. The decision-makers will consider approval of the required Conditional Use Authorization with respect to parking as part of their consideration of the proposed project. When taken collectively, this subsection discussion under the header “Automobile Parking, Bicycle Parking, and Loading” (Draft EIR pages III-7 through III-9) provides the details requested in the comment.

The following discussion addresses the comment that the Draft EIR should analyze a project not requiring a Conditional Use Authorization for automobile parking. In identifying alternatives, the consideration of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)). The Draft EIR did not identify a significant effect on the environment due to a substantial parking deficit that could create hazardous conditions or cause significant delays affecting transit, bicycles or pedestrians and where particular characteristics of the project or its site demonstrably render use of other modes infeasible. Therefore, the Draft EIR was not required to identify a reduced or no parking alternative. However, Alternative C, the Full Preservation Alternative would provide 117 vehicle parking spaces for 468 dwelling units; as stated on Draft EIR page VI-29, this “would represent a ratio of 0.25 spaces per dwelling unit, which is the maximum principally permitted (without Conditional Use authorization) in the existing Van Ness & Market Downtown Residential Special Use District.” Therefore, the Draft EIR did analyze an alternative that would not require a Conditional Use for the automobile parking ratio.

The proposed project seeks approval of a new special use district, the Mission and South Van Ness Special Use District, which would replace the existing Van Ness & Market Downtown Residential Special Use District on the project site. As noted on Draft EIR page II-36, the proposed Mission and South Van Ness Special Use District would, among other things, permit residential parking at a ratio of 0.5 parking spaces per dwelling unit, meaning that the proposed project would not require Conditional Use authorization if the proposed special use district is approved.

Comment PP-6: Housing Element Consistency

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

I-Hestor.17

“**Housing Element Needs III-10.** What are the ABAG goals by income level? Using the current measures what % of the need v goal is being produced adding this project and One Oak/1500 Market? As San Francisco displaces lower income EMPLOYEES - including those who will work at project site or nearby - and the housing produced is more and more market rate PLUS (which we are way over-producing), the people who are EMPLOYED who cannot afford housing in San Francisco seek housing outside of San Francisco. They create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. If the people OCCUPYING the new housing are reverse commuters from counties outside SF, they also create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. Discuss the effects of NOT housing in SF workers in SF, while housing in SF people who work in other counties. Displacement of EMPLOYEES - their travel to housing - is an environmental issue.

Response PP-6

The comment requests information concerning Association of Bay Area Governments (ABAG) established regional housing need targets and how the proposed project would meet a portion of that need. The comment states that increasing housing costs in San Francisco result in lower-wage workers having to commute longer distances to jobs in San Francisco, and that San Francisco residents who work outside the City also add to the commute burden.

As stated on page 34 of the Initial Study (Draft EIR Appendix A), “In July 2013, ABAG projected regional housing needs in the Regional Housing Need Plan for the San Francisco Bay Area: 2014–2022. In 2013, ABAG projected housing needs in San Francisco for 2014–2022 as 28,869 dwelling units, consisting of 6,234 dwelling units within the very low income level (0–50 percent), 4,639 within the low income level (51–80 percent), 5,460 within the moderate income level (81–120 percent), and 12,536 within the above-moderate income level (120 percent plus).”

As stated on Draft EIR page II-23, the proposed project would provide 20 percent on-site inclusionary affordable units, available to residents earning a maximum of 50 percent of the average median income. The One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) proposes to pay an inclusionary housing in-lieu fee, as permitted by *Planning Code* Section 415.^d

The proposed 1500 Mission street project would not displace any housing, as none exists on the site, and likely would not displace any employment; as stated on page 33 of the Initial Study (Draft EIR Appendix A), “it is likely that most existing employees would retain their jobs, as Goodwill Industries is moving its office and workforce training functions to 2290 Powell Street (at Bay Street) in San Francisco and its warehouse to South San Francisco.”

As stated on page 32 of the Initial Study, of the City employees who would work at the project site, the majority “are anticipated to already work in nearby existing City office buildings in the project vicinity and would relocate to the new office component at the project site.” These employees would not substantially affect commute patterns.

As stated above, the proposed project would develop 20 percent of on-site units (about 112) as BMR units. As a result, these units would contribute toward the City’s need for such affordable housing units that would otherwise not occur if the project were not built.

Comment PP-7: Area Plan Consistency

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

I-Hestor.18

I-Hestor.34

^d San Francisco Planning Department, *One Oak Street Draft Environmental Impact Report*, November 16, 2016. Available at http://sfmea.sfplanning.org/2009.0159E_DEIR.pdf. Reviewed January 16, 2017.

“Discussion of **Downtown Plan** is coldly academic and misleading. Guiding Downtown Development evolved into the Downtown Plan with a change of Mayors and Planning Directors. Simultaneous with the years of development of the Plan in early 80s was a huge public effort at the Planning Commission to require construction of housing affordable to projected work force AND expansion of the transit system AND expansion of child care so that HOUSING, TRANSIT and CHILD CARE came on line to meet the needs of the expanded work force when offices opened. Thus, fees required of new development. There was an active community pressure. The expansion area for downtown offices was the C-3-O (SD). The C-3-S and C-3-G, and Chinatown rezoning, were aimed at protecting lower income communities that surrounded the C-3-R and C-3-O. Downtown Plan policies did NOT call for massive height increases for residential or office towers at project site.”

...

“**Land Use Planning - page 29** [of the Initial Study, EIR Appendix A]. See above comments on Area Plans. This is in Market Octavia Area Plan. Its policies are being violated, especially as to excessive parking for the TRANSIT RICH site. There is too much residential parking, which will accommodate persons who want to reverse commute/drive to work. The freeways are RIGHT THERE. I have requested a map to inform the decision-maker. This is in a relatively flat area that encourages walking and biking by residents. There should be more comprehensive discussion of policies of Market/Octavia Plan AND of the Western SoMa Plan which covers the residential neighborhood directly across Mission Street. This includes TRAFFIC being redirected into that neighborhood by driving ‘apps’ which point to a ‘short-cut.’ page 30.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-7

The comments provide a brief history of the development of the Downtown Plan in the 1980s and states that the Draft EIR discussion of the Downtown Plan is misleading in that the Draft EIR implies that the Downtown Plan substantially increased height limits at the project site. The comments also request additional discussion of the policies in the Market & Octavia Area Plan and the Western SoMa Plans, and imply that the project would provide excessive parking when compared with those policies. Finally, the comments state that drivers are currently directed by mapping applications into the Lafayette, Minna, and Natoma (LMN) residential neighborhood south of the project site.

The Draft EIR discusses the Downtown Plan, an area plan within the *San Francisco General Plan*, in Chapter III, *Plans and Policies*. This chapter provides a general description of land use plans applicable to the 1500 Mission Street project and identifies the proposed project’s potential to conflict with those plans or policies adopted for the purpose of avoiding or mitigating an environmental effect (Draft EIR page III-1). This discussion is presented in accordance with Section 15125(d) of the state CEQA Guidelines. The Draft EIR’s discussion of the Downtown Plan provides a brief overview of the Downtown Plan and states that one of the Plan’s fundamental concepts was “to expand the City’s downtown office core south from its traditional location north of Market Street, in a way that protects the smaller-scale and mixed uses in Chinatown, Jackson Square, along Kearny Street, around Union Square, and in the Mid-Market and Tenderloin/North of Market neighborhoods” (Draft EIR page III-12). As noted by the commenter, the Downtown Plan guided this expansion of office space to the newly designated C-3-O (SD) (Downtown Office Special Development) Use District. This district, bounded generally by Market, Steuart, and Folsom Streets, and a line between New

Montgomery and Third Streets, has been the focus of nearly all high-rise office development in San Francisco since the adoption of the Downtown Plan in 1985.

Rezoning to implement the Downtown Plan, while reducing height limits in many parts of the Downtown, established the City's greatest height limits—550 feet—within the C-3-O (SD) district, specifically in the area around the former Transbay Terminal, now the location of the under-construction Transbay Transit Center.^e Regarding parking, the proposed project has a residential parking ratio of 0.5 space per unit, consistent with the amount of residential parking permitted in C-3 districts with Conditional Use Authorization.

In the area containing the proposed 1500 Mission Street project site, rezoning to implement the Downtown Plan maintained the greatest height limit at 320 feet on the south side of Market Street between 10th Street and South Van Ness Avenue and on the north side of Market Street between 10th and 11th Streets while reducing height limits from 320 feet to between 120 and 200 feet in areas just to the east and west, and also on the project site. However, more-recent adoption of the Market & Octavia Area Plan (also an area plan within the *General Plan*) and its accompanying rezoning has superseded the height limits enacted along with the Downtown Plan, resulting in greater height limits in the project vicinity. As stated on Draft EIR page III-13, the Market & Octavia Area Plan “promotes a mixed-use urban neighborhood in which new and current residents enjoy a vibrant pedestrian realm and rich transit connections ... [and] allows for intensive commercial uses and residential towers clustered around the intersection of Market Street and Van Ness Avenue.” As shown on Figure III-2, Existing Height and Bulk District Map (as retitled herein), Draft EIR page III-5 (as revised herein; see revised figure on page RTC-85, rezoning to implement the Market & Octavia Area Plan resulted in height limits of up to 400 feet in the project vicinity and between 85 and 320 feet on the project site. As noted on Draft EIR page II-36 (as amended herein), the proposed project would require Zoning Map amendments to change the site's height and bulk district designations and *General Plan* amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed project.

As for the Draft EIR's conclusions with respect to consistency with the Downtown Plan, the Draft EIR states, on page III-12, that in light of the fact that the Downtown Plan proposed to shift office development away from “the smaller-scale and mixed uses in Chinatown, Jackson Square, along Kearny Street, around Union Square, and in the Mid-Market and Tenderloin/North of Market neighborhoods, ... the proposed would not obviously conflict with the objective and policies of the Downtown Plan.”

Regarding the Market & Octavia Area Plan, as stated in the Draft EIR on page III-13, the Plan “promotes a mixed-use urban neighborhood in which new and current residents enjoy a vibrant pedestrian realm and rich transit connections.” Concerning the Market & Octavia Area Plan's direction with respect to parking, the introduction to that plan states, “The Market and Octavia neighborhood can grow supported by its access to public transit. In addition to repairing its physical fabric, new development can take advantage of the area's rich transit access to provide new housing and public amenities, and reduce new traffic and parking problems associated with too many cars in the area. Because the Market and Octavia neighborhood's location supports a lifestyle that doesn't have to rely on automobiles, space devoted to moving and storing them can be

^e Subsequently, the Transit Center District Plan, adopted in 2012, increased heights on a limited number of sites in the C-3-O (SD) Use District to as much as 1,000 feet, where the Salesforce Tower is currently rising to a height of 1,070 feet, including permitted rooftop sculptural element.

dramatically reduced—allowing more housing and services to be provided more efficiently and affordably. Market and Octavia can capture the benefits of new development while minimizing the negative effects of more automobiles.”

Like most recent area planning efforts in San Francisco, the rezoning that implemented the Market & Octavia Area Plan replaced parking requirements with parking maximums, consistent with direction in Plan Policy 2.2.3. Text accompanying this policy states, “Minimum parking requirements are one of the most significant barriers to the creation of new housing, especially affordable housing, and transit-oriented development in the plan area,” and text introducing the Plan’s Section 2, Housing, notes, “Housing can be built more efficiently, affordably, and more consistent with neighborhood character if parking is not required.” The Market & Octavia Area Plan’s Section 5, Transportation, contains a discussion of “Managing Parking,” which begins with the statement, “No great city is known for its abundant parking supply.” The ensuing Objectives 5.2, 5.3, and 5.4 and their implementing policies call for, among other things, encouraging transit use rather than driving, establishing parking maximums and eliminating required parking, supporting development of housing without parking, and managing available off-street parking as efficiently as possible. Regarding parking, the proposed project has a residential parking ratio of 0.5 space per unit, consistent with the maximum amount of residential parking permitted in the Van Ness & Market Downtown Residential Special Use District that was enacted to implement the policies of the Market & Octavia Area Plan in the project vicinity.

However, the Market & Octavia Area Plan contains a number of other objectives and policies, including, among other things, creating a mixed-use neighborhood with an urban form that reinforces the importance of the neighborhood; encouraging the construction of new, higher-density housing accessible to transit; and encouraging development that contributes to the beauty of the built environment. Ultimately, the Draft EIR concludes, on page III-13:

By replacing existing structures with a high-density residential, retail/restaurant, and office space development centered around transit, the proposed project at 1500 Mission Street would implement several policies identified in the [Market & Octavia] Area Plan, including but not limited to Policies 1.1.2 (concentrating uses in areas served by transit), 1.2.2 (maximize housing opportunities and encourage high-quality commercial spaces on the ground floor), and 1.2.8 (encourage the development of slender residential towers above the base height in the area along South Van Ness Avenue between Market and Mission Streets). However, the proposed project would introduce two new towers to the area that are generally taller and larger than other buildings in the vicinity. Therefore, the proposed project may conflict with Policy 1.2.4 of the Area Plan—encourage buildings of the same height along each side of major streets.

With respect to the last conclusion, it should be noted that a project proposed across South Van Ness Avenue at 10 South Van Ness Avenue (Case No. 2015-004568ENV; CEQA evaluation under way; included in cumulative analyses for the 1500 Mission Street project) would develop buildings up to 400 feet in height, comparable to the 1500 Mission Street project’s residential tower. Were the 10 South Van Ness Avenue project to be approved and constructed, along with the proposed 1500 Mission Street project, this would result in buildings of essentially the same height along each side of South Van Ness Avenue.

Concerning the Western SoMa Plan, this Plan encompasses the second line of parcels south of Mission Street (fronting on Minna Street), but not the parcels fronting Mission Street directly across the street from the project

site. As such, while the Western SoMa Plan area is proximate to the site, its policies are not relevant to the proposed project.

In light of the foregoing, the Draft EIR does not identify any substantial conflict with plans or policies adopted for the purpose of avoiding or mitigating an environmental effect.

With regard to the comment concerning traffic allegedly being directed into the LMN residential neighborhood south of the project site, it would not appear that using Lafayette Street, a one-way southbound street from Mission Street to Howard Street, would provide an advantage for freeway-bound traffic, given that Howard Street provides no freeway access (westbound Howard Street traffic must make a right turn at South Van Ness Avenue). Like many South of Market alleys, however, it is possible that some drivers may use the LMN streets to circumvent left-turn prohibitions on Market Street. It is possible that enforcement of existing turn restrictions and/or installation of traffic calming devices in the streets within the LMN neighborhood could alleviate existing traffic concerns of neighborhood residents.

Comment PP-8: The Hub Plan

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

I-Hestor.19

“The Hub Project - III-13. Who is the public (as opposed to developers) clamoring for The Hub? The perception is that this is being driven by the Planning Department. It is another amendment to the M/O Area Plan and the adjacent areas of the Eastern Neighborhoods Area Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-8

The comment requests clarification regarding the identity of the project sponsor for The Hub rezoning project, which is currently under consideration by the Planning Department. The Draft EIR, on page III-13, describes the planning process for the Market Street Hub Project as part of the context in which the proposed 1500 Mission Street project is being proposed. As stated on page III-13 of the Draft EIR, the Hub Project “... is a community-based planning effort led by the Planning Department that seeks to reexamine and propose changes to the current zoning, land use policies and public realm/street designs for the area referred to as “SoMa West” in the Market & Octavia Area Plan.” The Hub Project has not been approved, and is currently undergoing environmental review. The plan itself is also still in development, but, as stated on Draft EIR page IV-11, it is expected to included zoning changes requiring more permanently affordable housing units and to incentivize affordable housing for artists, office space for non-profit organizations, and performance or fine arts studio space; certain height and bulk increases but also a smoothing of height transitions to adjacent areas; the potential for inclusion of additional office space beyond current Market & Octavia Area Plan allowances; a reduction in allowed parking; transportation demand management policies; and development impact fees. As

part of the community planning process, the Planning Department has held two community workshops on the Hub Project in 2016, and additional community meetings and outreach are forthcoming.^f

Comment PP-9: Climate Action Plan Consistency

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

I.Hestor.21

“Climate action plan III.B.[15]. This size is in Geologic Hazard Zone. Along with One Oak it is Artificial Fill over Bay Mud. It used to be part of the Bay and has High Liquefaction susceptibility. Rising sea levels affect the ground water. Most of South of Market is Bay Fill. Including this site. Please acknowledge.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-9

The comment states that the project site and most of the South of Market neighborhood are situated on Bay fill and subject to liquefaction. The comment states that this condition will be aggravated by rising sea levels.

The Draft EIR acknowledges that the project site “is underlain by eight to 15 feet of loose to medium dense sandy fill,” in the Geology and Soils section of the Initial Study (Draft EIR Appendix A, page 65). The fill is underlain by four to 20 feet of marsh deposit and dune sand, which was likely former marshland along the margin of Mission Bay, which historically extended north nearly to Bryant Street near Fourth Street and northwest to approximately Seventh and Townsend Streets, where Mission Creek emptied into the Bay. Historic maps depict marshy areas extending west from the edges of Mission Bay, along with two creeks, one of which, Hayes Creek, flowed easterly towards Mission Bay about two blocks north of the project site, crossing present-day Market Street at about Ninth Street. Mission Bay and its marshlands and tributary creeks were filled to create much of the South of Market neighborhood, with Mission Creek and China Basin the lone remnant of the Bay.

As stated on page 66 of the Initial Study, “the site is within a designated liquefaction hazard zone as shown on the California Geological Survey (CGS) seismic hazard zone map for the area titled State of California Seismic Hazard Zones.” The project’s geotechnical investigation found that while there is liquefiable sand underlying the project site, there is no continuous liquefiable layer across the project site. According to the geotechnical investigation, excavation for the proposed project would remove most of the liquefiable soils, while remaining liquefiable soils can be over-excavated and replaced with competent fill and/or can be improved using soil-cement columns that would provide adequate foundation support for the proposed project.^g

Concerning the effects of sea level rise on groundwater levels, the potential exists that areas of land on artificial fill atop what was once San Francisco Bay or Mission Bay may experience some rise in groundwater

^f San Francisco Planning Department, *The Market Street Hub Project* website. Available at <http://sf-planning.org/market-street-hub-project>. Reviewed January 24, 2017.

^g Langan Treadwell Rollo, *Geotechnical Investigation, 1500–1580 Mission Street, San Francisco, California*, July 20, 2015.

level, which could also increase risk of liquefaction.^h However, the project site is approximately one mile from the historic shoreline of Mission Bay and considerably farther from the historic San Francisco Bay shoreline, based on the 1859 U.S. Coast Survey Map of San Francisco (see **Figure RTC-3, Distance of Project Site from Mission Bay Shoreline**, page RTC-28).ⁱ Therefore, due to the project's location and with measures outlined under the geotechnical report relating to the project's foundation, it is unlikely that groundwater levels at and near the project site would be affected by sea level rise to the degree that the risk of liquefaction would increase.

^h City and County of San Francisco Sea Level Rise Committee, "Guidance for Incorporating Sea Level Rise into Capital Planning in San Francisco: Assessing Vulnerability and Risk to Support Adaptation," September 22, 2014; p. 6. Available at <http://onesanfrancisco.org/wp-content/uploads/Sea-Level-Rise-Guidance.pdf>. Reviewed January 28, 2017.

ⁱ Available as a Google Earth overlay and from David Rumsey Map Collection; www.davidrumsey.com.



SOURCE: Google Earth; David Rumsey Map Collection

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-3
Distance of Project Site from Mission Bay Shoreline

Comment PP-10: Proposed Central SoMa Plan

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

I-Hestor.28

“Central SoMa Plan - IV B-60. To the public it appears that the Department is determined to spend years in public meetings, adopt an EN Area Plan for SoMa; spend years in public meetings, adopt a Western SoMa Area Plan; throw it all out to plan what the Department wants as a **3rd Plan** - increasing heights and density that were intentionally omitted from both of the prior plans. I have asked above for a MAP showing various EN Area Plan boundaries, the boundaries of any plans that altered an adopted plan, and the proposals for yet another plan.” (Sue C. Hestor; letter, January 4, 2017)

Response PP-10

The comment refers to the discussion of the Central SoMa Plan on Draft EIR page IV.B-10, in the Transportation section’s analysis of cumulative impacts. The comment raises questions about the planning process that has led to the Planning Department’s publication of a draft Central SoMa Plan, and notes the request for a map showing the boundaries for the various Eastern Neighborhood area plans. This map was created and is shown under Response PP-1 (see **Figure RTC-2, Recently Adopted Area Plans In and Near the 1500 Mission Street Project Site Vicinity**, page RTC-17).

The Draft EIR for the Central SoMa Plan (Case No. 2011.1356E; Draft EIR published December 14, 2016) provides the following background:

The need for the Plan became apparent during the Eastern Neighborhoods planning process, which was initiated in the early 2000s. In 2008, the City and County of San Francisco (the City) approved the Eastern Neighborhoods Rezoning and Area Plans project, which covered 2,300 acres on the city’s eastern flank and introduced new land use controls and area plans for the eastern part of SoMa (East SoMa), the Central Waterfront, the Mission, and Showplace Square/Potrero Hill neighborhoods. The Eastern Neighborhoods planning efforts had two primary objectives: to address and attempt to ensure a stable future for PDR (“production, distribution and repair,” generally light industrial) businesses in the city, mainly through zoning restrictions; and to plan for a substantial amount of new housing, particularly housing affordable to low-, moderate- and middle-income families and individuals. New housing would be developed in the context of “complete neighborhoods,” which would provide sufficient amenities for new residents of these areas.

At that time, the City determined that the pending development of the Central Subway transit project and the development potential of the surrounding area necessitated a separate, focused planning process that took into account the city’s growth needs as well as the opportunity to link transportation and land use planning. The Planning Department initiated the Central SoMa Planning Process in earnest in early 2011 with funding from the California Department of Transportation (Caltrans) and the San Francisco Municipal Transportation Agency (SFMTA).

Accordingly, by the time that the four Eastern Neighborhoods area plans (for East SoMa, the Mission, Showplace Square/Potrero Hill and the Central Waterfront) were considered for adoption in 2008, planning for the Central Subway—which is currently under construction and anticipated to begin operation in 2019—had progressed sufficiently that the City retained in place the existing Service Light Industrial (SLI) zoning in

East SoMa south of Harrison Street and proximate to the Central Subway route along Fourth Street, pending additional planning to account for the impending arrival of this new transit option. Therefore, the City did consider the potential for the Central SoMa Plan during the adoption of the Eastern Neighborhoods – East SoMa area plan.

Comment PP-11: Zoning Map

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

I-Hong.⁹

“Can additional description/s of Symbols be added to Figure III-1 in what (i.e. – Zoning—color, RED-MX represent?” (Dennis Hong; e-mail, January 3, 2017)

Response PP-11

The comment requests explanation of the use district abbreviations in Draft EIR Figure III-1, Existing Zoning Map (as retitled herein), page III-3.

A key has been added to revised Figure III-1 describing the existing zoning districts shown on the figure. The revised figure appears in Section D, Draft EIR Revisions following page RTC-84.

C.3 Cultural Resources

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
- Comment CR-2: The Proposed Project Would Result in Significant Adverse Impacts on Historical Resources
- Comment CR-3: Historical Photographs of 1500 Mission Street Building
- Comment CR-4: Remnant Streetcar Tracks on 11th Street

Comment CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building

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

O-Heritage.³

“Built in 1925, 1500 Mission is a one-story reinforced concrete industrial building originally designed in the Classical Revival style; the building was enlarged and altered in 1941 in the Streamline Moderne style. In 2010, architectural historian William Kostura ranked the building among the eleven best Moderne-style buildings in San Francisco: ‘The building as it was added to and remodeled in 1941 remains essentially unchanged since that date. For that period (1941) this building retains integrity of location, design, materials, workmanship, setting, feeling, and association.’³ The 1500 Mission Street Historical Resource Evaluation, prepared by Architectural Resources Group, concurs that the old Coca-Cola Building is individually eligible for listing in the California Register of Historical Resources under Criterion 3 (architecture), a finding later confirmed by the Planning Department and in the DEIR.

“The DEIR includes a comprehensive list of character-defining features that contribute to the building’s historic eligibility, including but not limited to the full length of the facades along Mission and 11th Streets, clock tower, stucco surface, belt courses along the base, etched speed lines along the top, the steel-and-glass doors and transom, and the building’s large, open interior with skylights supported by steel trusses.⁴” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

Response CR-1

The comment presents a summary of the information on which the Draft EIR based its conclusion that the building at 1500 Mission Street is a historical resource for purposes of CEQA, a conclusion with which the commenter concurs. No further response is required.

³ Kostura, William. DPR Form for 1500 Mission Street.

⁴ DEIR, at p.IV.A-13.

Comment CR-2: The Proposed Project Would Result in Significant Adverse Impacts on Historical Resources

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

O-Heritage.4

A-HPC.1

“The proposed project would demolish one non-historic building and incorporate a small portion of the Coca-Cola Building into a mixed-use development that includes a high-rise residential tower and offices for the San Francisco Departments of Building Inspection, Planning, and Public Works. Most of the historic façade along Mission Street would be retained to a depth of forty feet, including its clock tower, and converted to retail use. A significant portion of the 11th Street elevation would also be preserved.

“Amid San Francisco’s ongoing development boom, façade retention has increasingly been approved by the city as mitigation for projects that would otherwise fully demolish eligible historic resources (e.g., 1634–1690 Pine Street Project/The Rockwell). Although such projects often present nuanced and complex preservation issues, the practice of “façadism” is largely condemned by the national and international preservation community:

“Stripped of everything but its façade, a building loses its integrity and significance, rendering it an architectural ornament with no relation to its history, function, use, construction method, or cultural heritage. With only its primary facades saved, the original structure is gone, including the roof, interior features and volume of space. [A] new structure is added on, which may be set back and sometimes cantilevered over what was the roof level of the mostly demolished older building. When its defining features are mostly removed and no longer part of an integrated whole, a building no longer demonstrates its authentic self.”⁵

“Façade retention is considered demolition of a historical resource under CEQA and is generally inconsistent with the Secretary of the Interior’s Standards. As such, Heritage agrees with the DEIR’s conclusion that the proposed project, although improved from the original design, would nonetheless result in significant and unavoidable adverse impacts to historic resources.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] concurs with the findings that the proposed project does not meet the Secretary of the Interior’s Standards and will result in a significant, unavoidable impact to the identified historic resource, 1500 Mission Street.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

⁵ Woo, Eugenia. “What Price Facadism? Authenticity and Integrity in Historic Preservation,” ARCADE 33.2, Fall 2015. Available at <http://arcadenw.org/article/what-price-facadism>.

Response CR-2

The comments express general agreement with the Draft EIR's conclusion regarding impacts to historical resources. The comments will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Comment CR-3: Historical Photographs of 1500 Mission Street Building

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

A-Moore.1

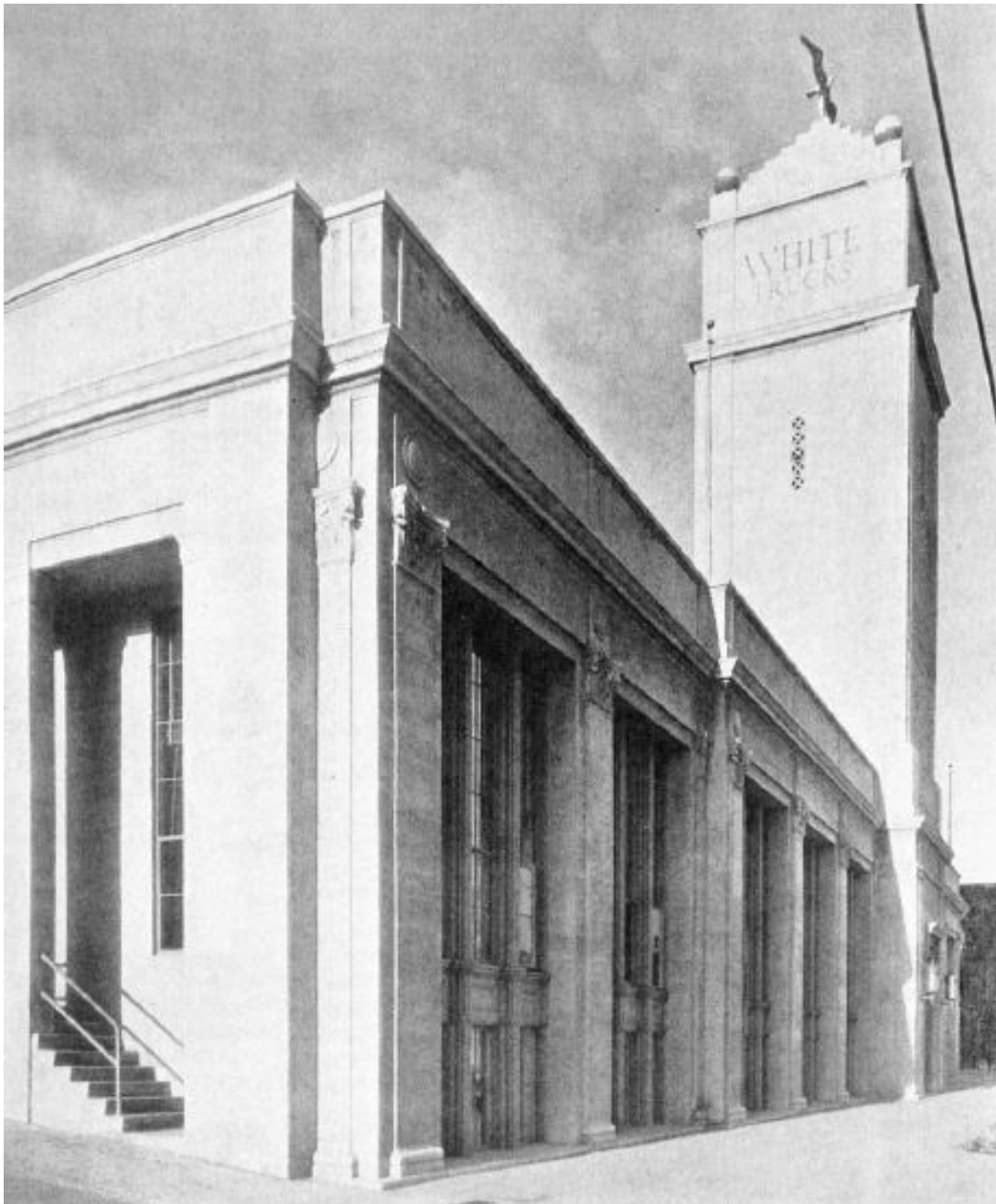
"I'd like to ask that in the historic preservation discussion of the 1500 Mission building that you include historic photos of the building that when it comes to the Final EIR will make it easier for people who are interested to comment to see what it was like. The building has slightly been altered overtime and there would be an emphasis on those elements that will be particularly integrated.

"We all have seen the first discussion on the building which does a very nice job of recognizing the importance of the building, but further elaboration on the background, historic photos would be very helpful, including where the main entrances were so we have a really better appreciation of what is included."(Planning Commissioner Kathrin Moore; Public Hearing Comments, December 15, 2016)

Response CR-3

The comment requests that the EIR present historical photographs of the former Coca Cola Building at 1500 Mission Street.

As stated in the Draft EIR on p. IV.A-11, the existing 1500 Mission Street building was constructed in 1925 and was enlarged and remodeled in 1941, in the Streamlined Moderne style, by the Coca-Cola Bottling Company. Based on the project's Historic Resources Evaluation, as concurred in by Planning Department preservation staff, the Draft EIR found that the building is eligible for individual listing in the California Register of Historical Resources under Criterion 3 (architecture) "as a local example of an industrial building designed in the Streamline Moderne style of architecture in San Francisco" (Draft EIR, p. IV.A-13). As such, the building is considered a historical resource for the purposes of CEQA. Because the conclusion with respect to California Register eligibility is based on the building's 1941 remodeling as a Streamlined Moderne structure, the original 1925 design, for the White Motor Company, is not historically significant. **Figure RTC-4, Historical Photos of 1500 Mission Street Building (White Motor Company Building)**, page RTC-34, presents a photograph of the original White Motor Company building, a sales and service facility for trucks and buses. This photograph, taken from the southwest corner of the building, looking east along Mission Street, shows the original Classical Revival building with its Mission Street façade comprising nine bays and a peaked clock tower. The 1941 remodeling added two bays and a rounded corner and window to the western end of the Mission Street façade, removed the peaked cap from the tower, and added Streamlined Moderne detailing on the building such as rounded corners and surfaces and speed lines (bands of horizontal piping). Clock faces were also added to the tower. **Figure RTC-5, Historical Photos of 1500 Mission Street Building (Coca-Cola Bottling Plant)**, page RTC-35, shows the remodeled and enlarged building around the 1940s and in 1964.



White Motor Company Building, 1925 (photo: Architect and Engineer, June 1927)

SOURCE: Architectural Resources Group

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-4
Historical Photos of 1500 Mission Street Building
(White Motor Company Building)



Coca Cola Building, ca. 1940s (photo: Swinerton, A Builder's History)



Coca Cola Building, 1964 (photo: San Francisco Public Library)

SOURCE: Architectural Resources Group

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-5
Historical Photos of 1500 Mission Street Building
(Coca Cola Bottling Plant)

Comment CR-4: Remnant Streetcar Tracks on 11th Street

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

A-Moore.2

"The second thing I would like to ask, and I think it falls under Historic Preservation, the issue of a streetcar spur, which is basically the T Line -- no, the J, the J Line has a push-back onto 11th Street, which is a very interesting phenomenon.

"I took a picture of it one day when I was walking down the street. And as I was coming up from Mission, there was an old street car standing on 11th Street. That was such an incredible complement for celebrating the new civic office presence on 11th Street that I would like to see that the historic spurs better explained in the EIR, together that the streetscape plan for 11th Street figures out on how we can have a historic marker about this phenomenon and potentially even a place where tourists can stop and experience the street car just as you experience the turnaround on Powell, the cable car on Powell Street.

"It's a great experience because normally you see that thing that's moving up and down Market Street you can really never touch or feel it. And when I saw it, I was so surprised, that I thought it would be a real great innovation and invitation for also certain retail -- to have a little restaurant which focused on the thing. I don't -- I cannot ask that there be a stop where you can jump onto it, but that would be obviously a great idea. I don't think it's quite set up that way. But for it to be standing there was just amazing to me.

"So that's on there and they have basically congestion, they pulled that spur that puts a car on that spur. And I'd like you to explain that a little bit more in the EIR."(Planning Commissioner Kathrin Moore; Public Hearing Comments, December 15, 2016)

Response CR-4

The comment refers to the two sets of streetcar stub tracks that extend on 11th Street approximately 280 feet south of Market Street and the "wye" that connects the eastbound and westbound streetcar tracks on Market Street with the tracks on 11th Street. The comment requests additional information about the tracks, including whether their presence could be commemorated by a historical marker.

The wye allows a single-ended streetcar to turn around, by turning onto the wye from one direction on Market Street and backing out of the wye onto the other direction of Market Street. Reportedly, these tracks are a remnant of Muni's old H Potrero-Van Ness streetcar line, which ran from Army (now Cesar Chavez) Street and Potrero Avenue to Fort Mason (later shortened to terminate at Van Ness Avenue and Bay Street) via Potrero Avenue, Division Street, 11th Street, Market Street, and Van Ness Avenue. Streetcars on this line were replaced with buses in 1950, with the 11th Street-Market Street segment being replaced by Mission Street and South Van Ness Avenue. Streetcar tracks were subsequently removed from 11th Street except for the rail stub and wye that remains. Today, Muni uses the wye tracks to occasionally turn around streetcars on the F Market & Wharves historic streetcar line. The 11th Street tracks are not used for regular passenger service on the F Market & Wharves historic streetcar line, but instead are used occasionally (e.g., about one to two times a week) to repair streetcars that break down in route, for streetcar service rebalancing, and to split the streetcar line into two during special events.

The commenter's request for a plaque explaining the presence of the 11th Street streetcar tracks is noted. The project does not propose changes to the rail stub, nor do other current plans exist for such a marker; however, this matter could be considered by the City as part of the project approval process.

C.4 Transportation and Circulation

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment TR-1: Transportation Setting
- Comment TR-2: Vehicle Miles Traveled (VMT) Impacts
- Comment TR-3: Transit Impacts
- Comment TR-4: Pedestrian Impacts
- Comment TR-5: Bicycle Impacts
- Comment TR-6: Construction Impacts
- Comment TR-7: Cumulative Construction Impacts
- Comment TR-8: Vehicle Trip Reduction
- Comment TR-9: Lead Agency Responsible for Mitigation
- Comment TR-10: Parking Demand in Nearby Neighborhoods

Comment TR-1: Transportation Setting

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

I-Hestor.3

I-Hestor.26

“Two maps must be added to 1500 Mission DEIR

...

“Map #2

“A map showing the location of the FREEWAYS and the freeway ramps/access just south and west of 1500 Mission. This should include the route right in front of the Planning Department and north on South Van Ness adjacent to Project site. **DEIR II-3** states that **Interstate 80 and US Highway 101 provide the primary regional access to project area**. Show it. I note the increasing amount of reverse commuting INTO San Francisco - so that the City provides HOUSING particularly for the Peninsula. There are currently 18 lanes of traffic into San Francisco from the South. The DEIR should be amended to state that those same freeways allow people to EXIT San Francisco to go to work. Reverse commute is a FACT.

“Requested map is necessary to understanding why excessive residential parking at Project, in the context of a changed reverse-commute pattern from Silicon Valley, has dumped demand for fairly high end housing into the area of 1500 Mission and One Oak/1500 Market. What is called the “Google buses” started in the very recent past, long after adoption of the M/O and EN Area Plans. Those plans were aimed at accommodating the demand for San Francisco housing based mostly on San Francisco employment and residents. Now San Francisco is producing housing for Silicon Valley, which encourages employee from Mountain View,

Cupertino, Menlo Park and other places on the peninsula to LIVE in San Francisco but WORK on the Peninsula. Since these are not low income employees, the demand is for rather high-end housing. AND THERE ARE FREEWAY CONNECTIONS RIGHT THERE.

“A MAP of the freeway access and ramps would help understand travel patterns and possible impacts. And direct attention to the excessive parking provided in this ‘TRANSIT RICH’ area. There is a freeway off ramp AT THE CORNER to the right of the Planning Department. There is an on ramp at South Van Ness and 13th. There is a Central Freeway ramp BEHIND the Planning Department.”

...

“Provide boundaries of **TAZ 591** or provide map. **IV B-4**. Depending on the boundary there may be few residents of TAZ 591, so it is hard to understand how relevant this is to goals in M/O Plan.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-1

The comments requests a map presenting the nearby freeways access ramps as well as clarification of the boundaries of the Traffic Analysis Zone (TAZ) 591 in which the project site is located. **Figure RTC-6, Regional Freeway Facilities in Project Vicinity**, page RTC-40, identifies the regional freeway connections. The vehicular routes between the project site and the freeway facilities are adequately described in the Draft EIR on pages IV.B-1–IV.B-2, and therefore the Draft EIR text was not amended to provide additional language that the freeway ramps are used to enter and exit San Francisco.

TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue. It includes the project block and the block to the south and southwest, with the residential area along Lafayette, Minna, and Natoma Streets, as well as the residential area along Howard Street between 12th Street and South Van Ness Avenue. The TAZ 591 data in Table IV.B-1 is provided to support analysis of whether the proposed project would increase vehicle miles traveled per capita, not whether the proposed project is consistent with the goals in the Market & Octavia Area Plan.

In response to the comment, the text of the note within Table IV.B-1 in the Final EIR on page IV.B-4 is revised as follows (new text shown in double-underline):

NOTE:

- a. The Traffic Analysis Zone (TAZ) in which the project site is located. TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue.

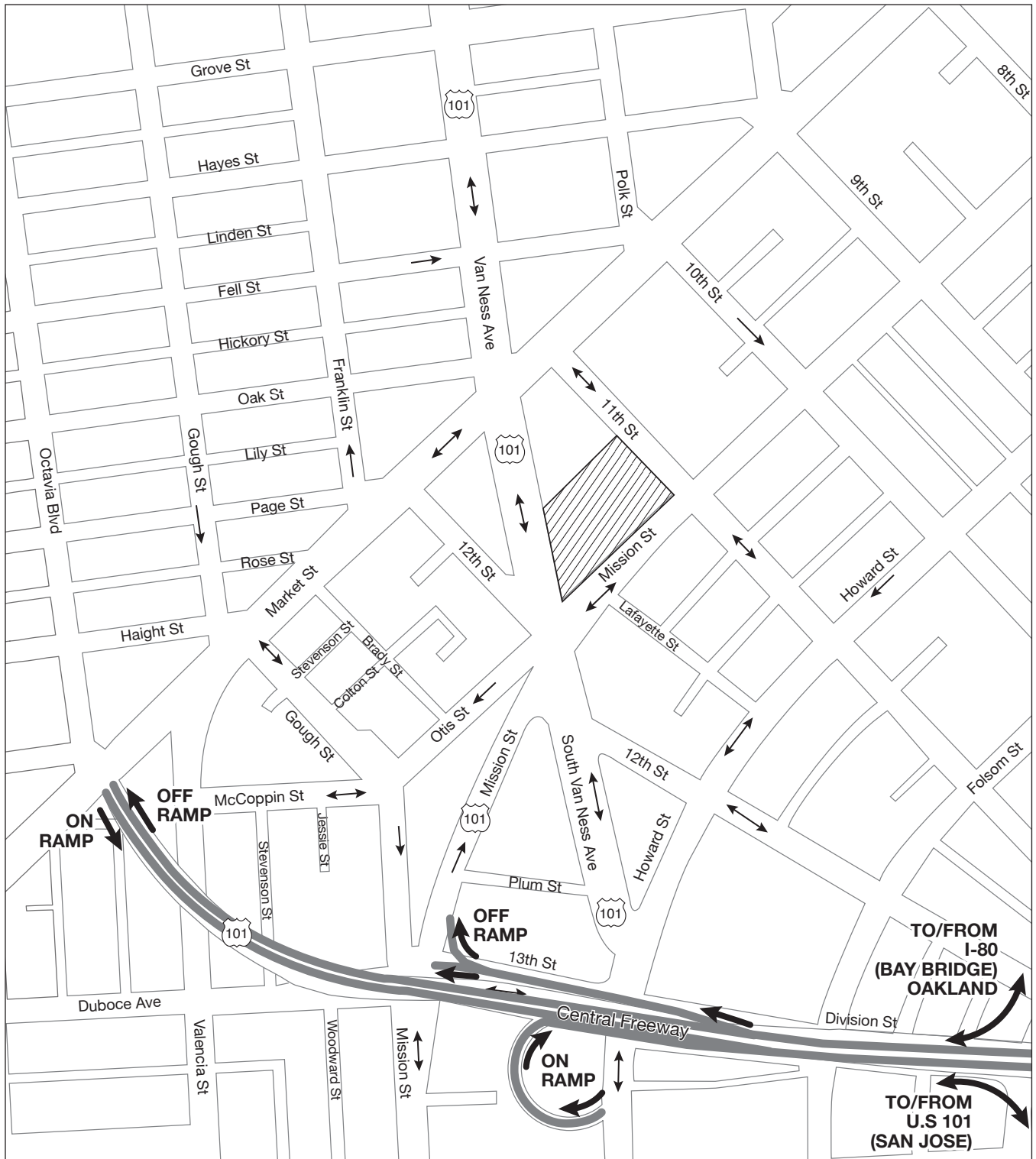
The first requested map is discussed above under Plans and Policies; see Response PP-1 on page RTC-13.

Comment TR-2: Vehicle Miles Traveled (VMT) Impacts

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

I-Hestor.7

I-Hestor.27



SOURCE: LCW Consulting



PROJECT SITE



DIRECTION OF VEHICULAR TRAVEL



SOURCE: LCW Consulting

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-6
Regional Freeway Facilities in Project Vicinity

“On **DEIR I-4** and later in the transportation discussion an assertion is made that **VMT** - Vehicle Miles Travelled - is the appropriate measurement for transportation studies under new CEQA rules. I refer to the comments being submitted by Jason Henderson critiquing how Planning erroneously applies the VMT standard in light of the intervening work writing the Market/Octavia Plan.

...

“**Use of VMT metric - IV B-17.** I incorporate by reference comments on One Oak DEIR on how VMT was required to be applied.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-2

The comments reference Draft EIR comments on the VMT analysis methodology submitted on the One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) in a letter dated January 4, 2017, by Jason Henderson, Chair, Transportation and Planning Committee of the of the Hayes Valley Neighborhood Association. While the One Oak Street Draft EIR letter from Mr. Henderson was not attached to the letters submitted by the commenter, nor was that letter prepared in response to this project’s Draft EIR, this response addresses the comments in the letter from Mr. Henderson. The comment letter on the One Oak Project from the Hayes Valley Neighborhood Association (Henderson) included comments related to the methodology used to assess impacts of the proposed project on VMT, including project-specific detailed analysis, effects of parking on VMT, and thresholds of tolerance for additional VMT. Other transportation-related comments on the One Oak Project related to site-specific comments on bicycle and loading impact, and need for analysis of additional alternatives with less or no on-site parking.

As indicated on Draft EIR page IV.B-19, California Senate Bill 743 requires the California Office of Planning and Research to establish criteria for determining the significance of transportation impacts that shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, the California Office of Planning and Research shall recommend potential metrics including VMT. VMT is a measure of the amount and distance that a project causes potential residents, tenants, employees, and visitors of a project to drive, including the number of passengers within a vehicle. The San Francisco Planning Commission replaced automobile delay (vehicular level of service) with VMT criteria via Resolution 19579, which was adopted at the Planning Commission hearing on March 3, 2016.

Attachment F of the March 3, 2016, staff report (Methodologies, Significance Criteria, Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts, which includes an appendix from the San Francisco County Transportation Authority) provides the Planning Department’s methodology, analysis and recommendations for the VMT analysis.^j The Planning Department uses maps illustrating areas that exhibit low levels of existing and future VMT to screen out developments that may not require a detailed VMT analysis. The Planning Department relies on the San Francisco Chained Activity Model Process (SF-CHAMP) model runs prepared by the San Francisco County Transportation

^j San Francisco Planning Department, Executive Summary, Resolution Modifying Transportation Impact Analysis, Hearing date: March 3, 2016.

Authority to estimate VMT within different geographic locations (i.e., Traffic Analysis Zones, or TAZs) throughout San Francisco.

As described on Draft EIR page IV.B-23, for residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent. For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent. For retail projects, the Planning Department uses a VMT efficiency metric approach for retail projects: a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above. Thus, the use of the threshold of 15 percent below regional averages of VMT to determine low levels of VMT for development projects meets the SB 743 requirements, and is therefore appropriate.

As documented in the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA ("proposed transportation impact guidelines"), a 15 percent threshold below existing development is "both reasonably ambitious and generally achievable."^k It is also noted that the threshold is set at a level that acknowledges that a development site cannot feasibly result in zero VMT without substantial changes in variables that are largely outside the control of a developer (e.g., large-scale transportation infrastructure changes, social and economic movements, etc.).

One rationale for using the SF-CHAMP maps to screen out projects, instead of a project-by-project detailed VMT analysis, is because most developments are not of a large enough scale and/or contain unique land uses to substantially alter the VMT estimates from SF-CHAMP. SF-CHAMP is not sensitive to site-level characteristics for a development (e.g., the amount of parking provided for a development). The amount of parking provided for a development, as well as other transportation demand management (TDM) measures, could result in VMT that differs from SF-CHAMP estimation. As part of the "Shift" component of the Transportation Sustainability Program, the City adopted a citywide TDM Program (effective March 2017). For the TDM Program, staff prepared the TDM Technical Justification document^l, which provides the technical basis for the selection of and assignment of points to individual TDM measures in the TDM Program. As summarized in the TDM Technical Justification document, a sufficient amount of research indicates that more parking is linked to more driving and that people without dedicated parking are less likely to drive. However, at this time, there is not sufficient data to quantify the specific relationship between parking supply and VMT for a development in San Francisco. CEQA discourages public agencies to engage in speculation. Therefore, the quantified VMT estimates in CEQA documents for a development currently do not directly account for the effect of a development's parking supply on VMT.

Impact TR-1 on Draft EIR pages IV.B-33 – IV.B-34 and Impact C-TR-1 on Draft EIR pages IV.B-61 – IV.B-62 present the assessment of the impact of the proposed project on VMT for existing and cumulative conditions, respectively. The project site is located within an area of the city where the existing and projected future

^k Governor's Office of Planning and Research, "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA," January 20, 2016, p. 20.

^l San Francisco Planning Department, Transportation Demand Management Technical Justification, June 2015. Available online at: http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification.pdf

cumulative VMT are more than 15 percent below the regional VMT thresholds, and therefore the proposed project's land uses (residential, office, retail/restaurant, and childcare) would not generate a substantial increase in VMT. Furthermore, the project site's transportation features, including sidewalk widening, on-street commercial loading spaces and passenger loading/unloading zones, and curb cuts, fit within the general types of projects that would not substantially induce automobile travel. Therefore, the proposed project would not exceed the project-level thresholds for VMT and induced automobile travel under existing conditions, and would not result in a cumulatively considerable contribution to VMT impacts.

Comment TR-3: Transit Impacts

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

I-Hong.³

"11th street - between Market Street and Mission Street has two existing parking garage entries/exits both to 1455 Market Street. [One South Van Ness Avenue] has two Entries/Exits as well.

"Does Muni still use this street for their train street car turn arounds(?).

"Were these issues considered?

"Only because of the Projects additional traffic along 11th street between Market Street and Mission will have an impact this street.

"Minor detail. Will the Muni Stop on South Van Ness at Mission remain? This is a heavier used Muni stop. The proposed residential tower at this stop will get a lot more use. Only because in some of the recent drawings it is not shown, i.e., in Figure II-4 and Figure 3-page 5.

"Will the existing Commuter Shuttle bus stop in front of 10 South Van Ness remain? Not sure if this was one of MTA HUB stop/s." (Dennis Hong; e-mail, January 3, 2017)

Response TR-3

The comments request clarification on the use of 11th Street and project impacts on Muni operations on 11th Street, clarification of relocation of the existing Muni bus stop on South Van Ness Avenue adjacent to the project site, and clarification whether the existing Commuter Shuttle bus stop in front of 10 South Van Ness Avenue would remain with implementation of the project.

Draft EIR page IV.B-5 describes Muni operations adjacent to the project site, including the presence of the Muni historic streetcar tracks on 11th Street north of the project site. On 11th Street, there are two sets of streetcar stub tracks that extend approximately 280 feet south of Market Street and a "wye" that connects the eastbound and westbound streetcar tracks on Market Street with the tracks on 11th Street. The 11th Street tracks and wye are not used for regular passenger service on the F Market & Wharves historic streetcar line, but instead are used occasionally (e.g., about one to two times a week) to temporarily store streetcars that break down en route, for streetcar service rebalancing, and to split the streetcar line into two during special

events.^m The use of the stub tracks and wye are anticipated to remain similar to existing conditions, and may decrease in the future if a streetcar track loop proposed as part of the Better Market Street project (currently undergoing environmental review) is constructed.ⁿ The proposed streetcar track loop included in the Better Market Street project would run one-way westbound along McAllister Street between Market Street and Charles J. Brenham Place (formerly Seventh Street North), and one-way southbound on Charles J. Brenham Place between McAllister and Market Streets, and could be used to split the streetcar line into two during special events. Thus, the proposed loop would likely reduce the use of the rail stub and wye on 11th Street.

The presence of driveways into existing parking garages, driveways into the proposed project garages, the existing streetcar tracks, and existing bus operations on 11th Street were considered in the proposed project's transit impact analysis. Due to the impending implementation of a number of transportation improvements on the streets adjacent to the project site, the project transportation elements, such as driveways and sidewalk widening, were subject to SFMTA review. Impacts of the proposed project on Muni operations are presented in Impact TR-3 on Draft EIR pages IV.B-43 – IV.B-47. The analysis determined that the proposed project would not substantially affect Muni transit operations on 11th Street or South Van Ness Avenue, but that operations of the proposed off-street loading area for the residential/retail building could result in a significant transit impact due to delays to Muni buses on Mission Street. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations, described on Draft EIR pages IV.B-44 – IV.B-47 was developed with the SFMTA to mitigate impacts of the proposed project on Muni transit operations on Mission Street to less than significant.

As noted above, due to impending implementation of a number of transportation improvements on the streets adjacent to the project site, the project transportation elements were subject to SFMTA review, and the project design and impact assessment accounts for these planned and funded transportation improvements. As stated on Draft EIR page IV.B-22, with implementation of the Van Ness BRT, the existing curbside bus stop on South Van Ness Avenue directly north of Mission Street will be discontinued, and instead a northbound BRT station will be located within the median within South Van Ness Avenue at the approach to Market Street. Thus, the project plans referenced in the comment requesting clarification of the status of the existing Muni bus stop on South Van Ness Avenue adjacent to the project site assume the changes to South Van Ness Avenue as a result of implementation of the Van Ness BRT project, which is currently under construction.

In response to the comment inquiring whether the existing Commuter Shuttle Program bus stop in front of 10 South Van Ness Avenue would remain, this stop has been eliminated by the San Francisco Municipal Transportation Agency (SFMTA) and no longer exists. For information, the SFMTA Commuter Shuttle Program for 2016–2017 provides for up to 125 stops for private commuter shuttle buses, either shared with or separate from Muni bus stops. Shuttle operators must obtain a permit and pay a fee to use the shuttle stops, and must comply with guidelines and specifications established with SFMTA. Permittees must also establish a "Service Disruption Prevention Plan." The Commuter Shuttle Program is independent of any individual development project, such as the 1500 Mission Street project.

^m Telephone conversation between Ian Trout, SFMTA and Luba Wyznyckyj, LCW Consulting on January 26, 2017.

ⁿ *Better Market Street Project, Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting*, January 14, 2015, Planning Department Case No. 2014.0012E.

Comment TR-4: Pedestrian Impacts

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

I-Hong.⁴

“Keeping Vision 0 in mind, I was unable to reconcile the pedestrian and the vehicle traffic issue, was this issue considered at both the:

“- busy intersection - Mission Street, South Van Ness, Otis and 12th Street.

“- busy intersection - Market Street at Van Ness/South Van Ness?

‘- soon to be [busy intersections of] 11th and Mission Street and 11th and Market Street.” (Dennis Hong; e-mail, January 3, 2017)

Response TR-4

The comment raises Vision Zero concerns at the four intersections in the immediate vicinity of the project site—Van Ness/South Van Ness/Market, South Van Ness/Mission, 11th/Market, and 11th/Mission.

The City’s Vision Zero Policy, described on Draft EIR page IV.B-18, was considered in the transportation impact assessment. While Van Ness and South Van Ness Avenues, and Market and Mission Streets are included as Vision Zero High Injury Network Streets, there are no identified High Injury Intersections in the project vicinity.^o There are a number of existing, planned, and proposed projects in the project vicinity that would implement improvements to address Vision Zero goals. The Van Ness BRT project (described on Draft EIR page IV.B-22) is currently under construction and includes improvements to make Van Ness Avenue and South Van Ness Avenue safer and more comfortable for pedestrians who access the transit stations, including the planned station at the intersection of Van Ness/South Van Ness/Market. The SFMTA Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements (described on Draft EIR page IV.B-22) would be implemented as part of the Van Ness BRT changes and will improve pedestrian crossing conditions and safety at this six-legged intersection. The proposed Better Market Street Project (described on Draft EIR page IV.B-59) includes improvements to the segment of Market Street between Octavia Boulevard and The Embarcadero (and potentially to segments of Mission, Tenth, and Valencia Streets) that would include pedestrian and bicyclist improvements. In addition to these transportation projects, the proposed project includes a number of pedestrian improvements adjacent to the project site, including wider sidewalks on South Van Ness Avenue and 11th Street.

The impacts of the proposed project on pedestrians are discussed in Impact TR-4 on Draft EIR page IV.B-47. The new pedestrian trips would be accommodated on the existing pedestrian network and would not substantially affect the pedestrian conditions on sidewalks and crosswalks in the project vicinity. The proposed project would add pedestrian trips to nearby crosswalks, but would not introduce new hazardous design features to the intersections. The majority of the pedestrian trips would be added to the South Van

^o SFMTA, *Vision Zero Two-Year Action Strategy, Eliminating Traffic Deaths by 2024*, February 2015.

Ness Avenue and Mission Street sidewalks, although a portion of trips to and from the office and permit center component would also travel on 11th Street between the office building concourse/entrance and Market Street. Impact TR-4 identifies a significant pedestrian impact associated with the on-site truck loading area for the residential/retail building that would be accessed via Mission Street and a mid-block alley (see discussion on Draft EIR page IV.B-48). Unrestricted truck access to these on-site loading spaces has the potential for interfering with pedestrian circulation on Mission Street and in the mid-block alley, creating potentially hazardous conditions for pedestrians. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading (Draft EIR page IV.B-44), would manage loading access and activities for the residential/retail building, and includes monitoring to ensure that loading activities would not affect pedestrians on Mission Street. This mitigation measure would reduce proposed project impacts on pedestrians to a less-than-significant level.

Comment TR-5: Bicycle Impacts

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

I-Hestor.9

I-Hestor.22

“Proposed Site Plan Figure II-4 shows long curb cut along Mission Street. I refer to and incorporate comments on issues related to bicyclist safety ... that Henderson is submitting on One Oak DEIR. The safety ... issues are similar and only separated by one block.” (Sue C. Hestor; letter, January 4, 2017)

...

“Refer to comments submitted on One Oak regarding the hazards to bicyclists in the curb cut. III-16.” (Sue C. Hestor; letter, January 4, 2017)

Response TR-5

The comments raise concerns regarding bicyclist safety, particularly with respect to the proposed project driveway on Mission Street, and references comments submitted on the proposed One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E).

The curb cut on Figure II-4 is for the on-site loading spaces for the proposed residential/retail building, and would be located in a similar location of the existing driveway serving the Goodwill loading area that would be eliminated. The 26-foot-wide curb cut is a standard width for two access lanes for trucks.

Impacts of the proposed project on bicyclists are discussed in Impact TR-5 on Draft EIR page IV.B-49. In the project vicinity, Market Street is the primary east-west route for bicyclists, and bicycle lanes are provided in both directions. Mission Street is a transit-preferential street and not heavily used by bicyclists, however, 11th Street between Market and Mission Streets, and Mission Street west of 11th Street serve as connector routes to bicycle facilities southwest of Market Street. As described on Draft EIR page IV.B-50, the SFMTA’s Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements and Muni Forward TTRP.14 projects include removal of all on-street parking spaces on the north side of Mission Street between 11th Street and South Van Ness Avenue and restriping the westbound right-of-way to provide for a curbside right-turn-

only lane to South Van Ness Avenue, a bicycle lane, a transit-only lane, and two westbound mixed-flow travel lanes. As discussed in the Draft EIR, unrestricted truck access into the on-site loading spaces for the residential/retail building would have the potential to block bicycle access to on-street bicycle parking and block bicycle travel on Mission Street, thereby increasing the potential for conflicts and potential safety hazards between bicyclists, buses, and other vehicles on Mission Street. Instead of accessing the on-site loading facility, some truck drivers may conduct loading activities at the curb travel lane along Mission Street, which may result in queues within the Mission Street vehicle and bicycle lanes. The Draft EIR identified these conditions as potentially hazardous conditions for bicyclists, therefore resulting in a significant impact on bicyclists. Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations (Draft EIR page IV.B.-44), was developed to ensure that trucks accessing the loading area do not double-park within the planned bicycle lane while awaiting access into the mid-block alley, or otherwise create hazardous conditions for bicyclists. With implementation of Mitigation Measure M-TR-3, impacts on bicyclists would be less than significant.

The comments raised by Mr. Henderson (Hayes Valley Neighborhood Association letter dated January 4, 2017) on the One Oak Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) relate to potential impacts of the use of the existing recessed on-street truck loading bay on Market Street between Van Ness Avenue and Franklin Street on bicyclists traveling within the westbound bicycle lane on Market Street. The proposed 1500 Mission project would not substantially affect bicycle travel on Market Street, and as described above, potential safety issues related to bicycle travel on Mission Street were addressed and mitigated to less than significant.

The letter from Mr. Henderson also raised the issue of the proposed project's wind impacts on bicyclists. This issue is addressed in Response WI-1.

Comment TR-6: Construction Impacts

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

A-Caltrans.3

“A Transportation Management Plan (TMP) or construction Traffic Impact Study may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with the California Manual on Uniform Traffic Control Devices. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510.286.4579 and see the following website:

<http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev1.html>.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-6

The comment states that a Transportation Management Plan or construction Traffic Impact Study may be required where traffic restrictions and detours affect State highways (e.g., South Van Ness Avenue). As noted on Draft EIR page IV.B-55, project construction would be required to comply with the City of San Francisco's

Regulations for Working in San Francisco Streets (the Blue Book), as well as other city, state and federal codes, rules, and regulation. If required, the project sponsor would comply with Caltrans requirements for a Transportation Management Plan and/or Traffic Impact Study.

As noted on Draft EIR page IV.B-55, proposed project construction activities are not anticipated to require traffic restrictions or detours affecting South Van Ness Avenue, with the exception of some construction activities such as delivery of large construction equipment and oversized construction materials that would require one or more temporary travel lane closures on South Van Ness Avenue. Such activities would likely be conducted on weekend days when pedestrian, traffic, and transit activity is lower.

Comment TR-7: Cumulative Construction Impacts

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

I-Hestor.11

I-Hestor.25

“Construction impacts II-28. Assume that both 1500 Mission and One Oak/1500 Market will be constructed simultaneously. Please describe. They are scheduled for approval at the same time. Other already approved buildings could also start construction. But please provide traffic, sidewalk, etc. disruption is both happened at SAME or over-lapping time.

...

“Explain changes underway to Van Ness Ave - including overlap with construction times of 1500 Mission and One Oak. **DEIR IV B-3.**” (Sue C. Hestor; letter, January 4, 2017)

Response TR-7

The commenter states that construction of the proposed project would overlap with other nearby planned and proposed development and transportation projects, and requests information on impacts of overlapping construction activities.

Impact C-TR-8 on Draft EIR pages IV.B-71 - IV.B-73 presents the discussion of cumulative construction-related transportation impacts. The impact discussion acknowledges potential construction overlap with other nearby approved and proposed projects, including the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) and the Van Ness Bus Rapid Transit (BRT) project. Construction of the Van Ness BRT project is under way and will be completed in 2018. Assuming that the proposed 1500 Mission Street project and the proposed One Oak Street Project approvals are obtained in 2017, construction of these projects could overlap with the Van Ness BRT project for about one year. As described in the Draft EIR, given the magnitude of projected cumulative development and transportation/streetscape projects anticipated to occur within a few blocks of the project site, and the uncertainty concerning construction schedules, cumulative construction activities could result in multiple travel lane closures, high volumes of trucks in the project vicinity, and travel lane and sidewalk closures, which in turn could disrupt or delay transit, pedestrians, or bicyclists, or result in potentially hazardous conditions (e.g., high volumes of trucks turning at intersections). This would be a significant impact. Mitigation Measure M-C-TR-8, Construction Coordination (Draft EIR page IV.B-72), would

require the project sponsor, or its contractor(s) to consult with various City departments such as SFMTA and Public Works through the Interdepartmental Staff Committee on Traffic and Transportation, and other interdepartmental meetings, as needed, to develop coordinated plans that would address construction-related vehicle routing, detours, and transit, bicycle, and pedestrian movements adjacent to the construction area for the duration of construction overlap. Key coordination meetings would be held jointly between project sponsors and contractors of other projects for which the City departments determine impacts could overlap. Implementation of Mitigation Measure M-C-TR-8 would minimize, but would not eliminate, the significant cumulative impacts related to conflicts between construction activities and pedestrians, transit, bicyclists, and autos, and cumulative construction impacts would remain *significant and unavoidable*.

Comment TR-8: Vehicle Trip Reduction

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

A-Caltrans.2

“Caltrans commends the City for including a Transportation Demand Management (TDM) plan to reduce vehicle trips associated with the project. Given the size of the project and its potential to generate trips to and from the project area, such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. In addition to the measures recommended in the Draft EIR, with consideration of the City’s unique commuting patterns, please also consider recommending inclusion of an onsite telecommute or telework center to give residents the option of working remotely.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-8

The comment commends inclusion of a TDM plan for the proposed project, and recommends inclusion of an on-site telecommute or telework center to give residents the option of working remotely. As described on Draft EIR p. IV.B-37, the City’s TDM Program Standards identify a menu of TDM options that would encourage use of sustainable modes and reduce VMT. The TDM Ordinance was approved by the Board of Supervisors on February 7, 2017 and becomes effective March 19, 2017. The approved TDM Ordinance includes measures addressing active transportation modes, car-share, delivery, family-oriented measures, high-occupancy vehicles, information and communications, land use, and parking. Telecommute or telework centers are not included in the City’s recommended list of TDM measures given the difficulty involved in the City being able to effectively monitor compliance for such a measure. However, it should be noted that there are numerous office-share options within walking, transit, and bicycling proximity to the proposed project (e.g., Citizen Space, NextSpace, WeWork, Impact Hub, Bespoke Coworking, among others) that could readily support residents working remotely. In addition, the proposed residential building would include amenity areas that would cater to residents working from home and would feature workstations, private conference rooms, and free high-speed Internet access.

Comment TR-9: Lead Agency Responsible for Mitigation

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

A-Caltrans.1

“As the Lead Agency, San Francisco (the City) is responsible for all project mitigation, including any needed improvements to State highways, if necessary. The project’s fair share contribution, financing, scheduling, implementation responsibilities, and Lead Agency monitoring should be fully discussed for all proposed mitigation measures.” (Patricia Maurice, Caltrans; letter, December 6, 2016)

Response TR-9

The comment states that the City, as Lead Agency, would be responsible for all mitigations affecting State highways, and that the project’s fair-share contribution of those mitigation measures, as well as monitoring, need to be fully disclosed. Neither of the two transportation mitigation measures identified for the proposed project in the Draft EIR would require improvements on Caltrans right-of-way (ROW), and therefore, there is no need to identify the project’s fair share contribution, financing, scheduling, or implementation responsibilities for any projects on Caltrans ROW.

Draft EIR Mitigation Measure M-TR-3, Avoidance of Conflicts Associated with On-Site Loading Operations, would manage access to the on-site loading area via Mission Street in such a way that does not result in significant conflicts with transit, bicyclists, pedestrians, or other vehicles, or result in potentially hazardous conditions. Mitigation Measure M-C-TR-8: Construction Coordination addresses transportation impacts of overlapping construction activities of cumulative projects and would require the project sponsor, or its contractor(s) to consult with various City departments such as SFMTA and Public Works through ISCOTT, and other interdepartmental meetings, as needed, to develop coordinated plans that would address construction-related vehicle routing, detours, and transit, bicycle, and pedestrian movements adjacent to the construction area for the duration of construction overlap.

As part of project approvals, a Mitigation Monitoring and Reporting Program (MMRP) will be prepared and adopted to ensure proper implementation of the mitigation measures identified in the Final EIR. Consistent with CEQA Guidelines Section 15097, the MMRP is designed to ensure implementation of the mitigation measure and would be adopted by decision makers to mitigate or avoid the project’s significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines Sections 15091 and 15092). Because this Draft EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings must include a Statement of Overriding Considerations for those impacts (CEQA Guidelines Section 15093(b)). The project sponsor would be required to implement the MMRP as a condition of approval.

Comment TR-10: Parking Demand in Nearby Neighborhoods

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

I-Rhine.2

Note to reader: The first passage below quoted from the Draft EIR is from the Population and Housing section of the Initial Study, Draft EIR Appendix A, p. 34 (Impact C-PH-1, not Impact C-LU-1, as stated in the preceding text). Although the “comment” below discusses parking, the text concerning population is presented here, as in the original comment letter. Because the quoted text begins in the middle of a sentence, the beginning of the sentence is added by the authors of this document, in *italics*, for context.

“Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative land use impact.

LTS None required. NA

“EIR states, *‘The approved and proposed projects identified in Table 2, Cumulative Projects within 0.25 mile of the Project Site, and mapped on Figure 6, Cumulative Projects within 0.25 mile of the Project Site, within 0.25 mile of the project site would add approximately 7,510 new residents within 3,237 new dwelling units. Overall, these approved and proposed projects, when combined with the proposed project, would add 8,904 new residents in the project vicinity, which would represent a residential population increase of approximately 29 percent.’*

“EIR states, **‘Accordingly, parking impacts can no longer be considered in determining the significance of the proposed project’s physical environmental effects under CEQA.** Although not required, the EIR presents a parking demand analysis for informational purposes. The EIR also considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis.’

“Comment:

“Evidently impacts related to parking are no longer analyzed. With the exception of the LMN RED area, there is limited street parking in the project vicinity. The project as well as the future hub residential development provides limited onsite residential parking. The EIR merely assumes future tenants will not own cars because parking will not be provided. There is no assurance this will be case, and if future residents own cars without project provided parking they will be “hunting” for parking spaces in our neighborhood area, circling endlessly in that quest. The LMN RED has weekday residential parking controls, but not for weekends. Residents and businesses in the LMN RED use their cars and trucks for work seven days a week, they rely on street parking. Residential parking controls need to be extended to seven days per week and strictly enforced so residents, particularly renters, businesses and their customers, can continue to have access to street parking. Also, this area is occupied by residents who work in blue collar trades and have trucks which they use for work. These workers do not have off street parking and any increase demand for off street parking will just add to an already tenuous situation with regards to these small business trades people. With the future cumulative Hub development this represents a real impact to the residents and small businesses in the LMN RED. Finally, related to increased traffic due to people seeking parking in our neighborhood, there is no analysis of the air pollution and noise impacts within the LMN RED District boundary.” (Robert Rhine; e-mail, December 6, 2016)

Response TR-10

The comment expresses concern about potential parking impacts in the Lafayette, Minna, and Natoma (LMN) residential neighborhood to the south of the project site, as well as potential air quality and noise impacts from traffic resulting from drivers seeking parking in this neighborhood.

The boldface text quoted regarding parking is from the Initial Study transportation section. The Draft EIR provides a more extensive explanation, in the Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*, of SB 743 and CEQA Sec. 21099 as to why parking is not analyzed. As stated on Draft EIR page IV-2:

CEQA Statute Section 21099(d) states that “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.”²⁶ Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;²⁷
- b) The project is on an infill site;²⁸ and
- c) The project is residential, mixed-use residential, or an employment center.²⁹

The proposed project meets each of the above three criteria because it is (1) located within one-half mile of several rail and bus transit routes, (2) located on an infill site that is already developed with a one-story warehouse structure currently occupied by Goodwill Industries, with a below-grade parking garage, and a two-story retail and office structure also currently occupied by Goodwill Industries, and (3) would be a residential and retail/restaurant space, as well as an employment center.³⁰ Thus, this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.

However, the Draft EIR presents parking supply and demand data for informational purposes. As stated on Draft EIR page IV.B-15, while on-street parking in the project vicinity is well-utilized, evening occupancy at off-street parking facilities averages less than 50 percent, indicating that parking is available when most workers are at home.

As for the proposed project, residential parking is proposed at a ratio of one parking space per two dwelling units (0.5 spaces per unit). With considerably fewer spaces available than one space per unit, evidence

²⁶ Refer to CEQA Statute Section 21099(d)(1).

²⁷ CEQA Statute 21099(a)(7) defines a “transit priority area” as an area within 0.5 mile of an existing or planned major transit stop. A “major transit stop” is defined in CEQA Statute 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

²⁸ CEQA Statute 21099(a)(4) defines an “infill site” as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is *separated* only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

²⁹ CEQA Statute 21099(a)(1) defines an “employment center” as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

³⁰ San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 1500 Mission*, September 14, 2016. This document (and all other documents cited in this report, unless otherwise noted) is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2014.000362ENV.

suggests that driving by project residents would be lower than would be the case if more parking were provided.^p

Concerning parking controls in the LMN neighborhood and the fact that residential permit parking is not applied on weekends, this is a regulation that could be altered by the San Francisco Municipal Transportation Agency, which oversees the residential permit parking program.

Finally, the number of new vehicles from the proposed project potentially searching for parking in the LMN neighborhood would not create adverse local air quality effects, as the volume of additional project-generated traffic would be too small. (e.g., carbon monoxide, the only criteria pollutant with local effects, requires tens of thousands of daily vehicles to pass by a location in order to generate a significant impact). Likewise, traffic volumes on streets in the LMN neighborhood would be unlikely to double, which is the threshold for perceptible change in traffic noise, from people seeking parking. Therefore, air quality and noise effects would be less than significant.

^p San Francisco Planning Department, *Transportation Demand Management: Technical Justification*, June 2016, p. 31. (http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification.pdf). Reviewed January 30, 2016.

C.5 Wind

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment WI-1: Wind and Bicycle Safety
- Comment WI-2: Request for Detail Regarding Wind Screens
- Comment WI-3: Ongoing Wind Analysis in the Project Vicinity

Comment WI-1: Wind and Bicycle Safety

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

I-Hestor.9

I-Hestor.29

"I refer to and incorporate comments on issues related to bicyclist safety and winds that Henderson is submitting on One Oak DEIR. The safety and wind issues are similar and only separated by one block.

...

"**Winds - IV.D.10** ignores totally the effects on bicycles. I have talked to cyclists who were knocked off their bikes or pushed into traffic by gusting winds. This needs to be discussed seriously in EIR. There are more than pedestrians that are affected. See comments on One Oak DEIR." (Sue C. Hestor; letter, January 4, 2017)

Response WI-1

The comments refer to a comment letter submitted January 4, 2017, on the One Oak Street Project Draft EIR (1500–1540 Market Street; Case No. 2009.0159E) by Jason Henderson, Chair, Transportation and Planning Committee of the Hayes Valley Neighborhood Association. In that letter, Mr. Henderson states that, while the One Oak Draft EIR analyzes wind effects on pedestrians, it does not analyze wind effects on bicyclists, including effects of the building and of wind canopies. These effects, the letter says, could include safety impacts such as wind pushing bicyclists off-course and potentially into traffic, and could deter bicycling, thereby undermining City policy that encourages cycling.

The commenter is correct in noting that the wind analysis focuses on pedestrian effects. However, the wind analysis includes test locations on both sides of the street surrounding the project site, meaning that the results can fairly be interpreted to encompass wind conditions in the street in between test points on either sidewalk; that is, wind speeds in the traffic lanes or, where applicable, bicycle lanes, would likely be in between the speeds on either sidewalk.

As described in Draft EIR Section IV.D, Wind, beginning on page IV.D-5, the proposed project would not result in substantial increases in ground-level winds, either along the project frontage of Mission Street or South Van Ness Avenue, or on the opposite side of the street. The proposed project would not result in any new exceedance of the wind hazard criterion along the streets surrounding the project site. In the pedestrian comfort analysis, as reported on Draft EIR page IV.D-9, "wind speeds would increase at 20 locations

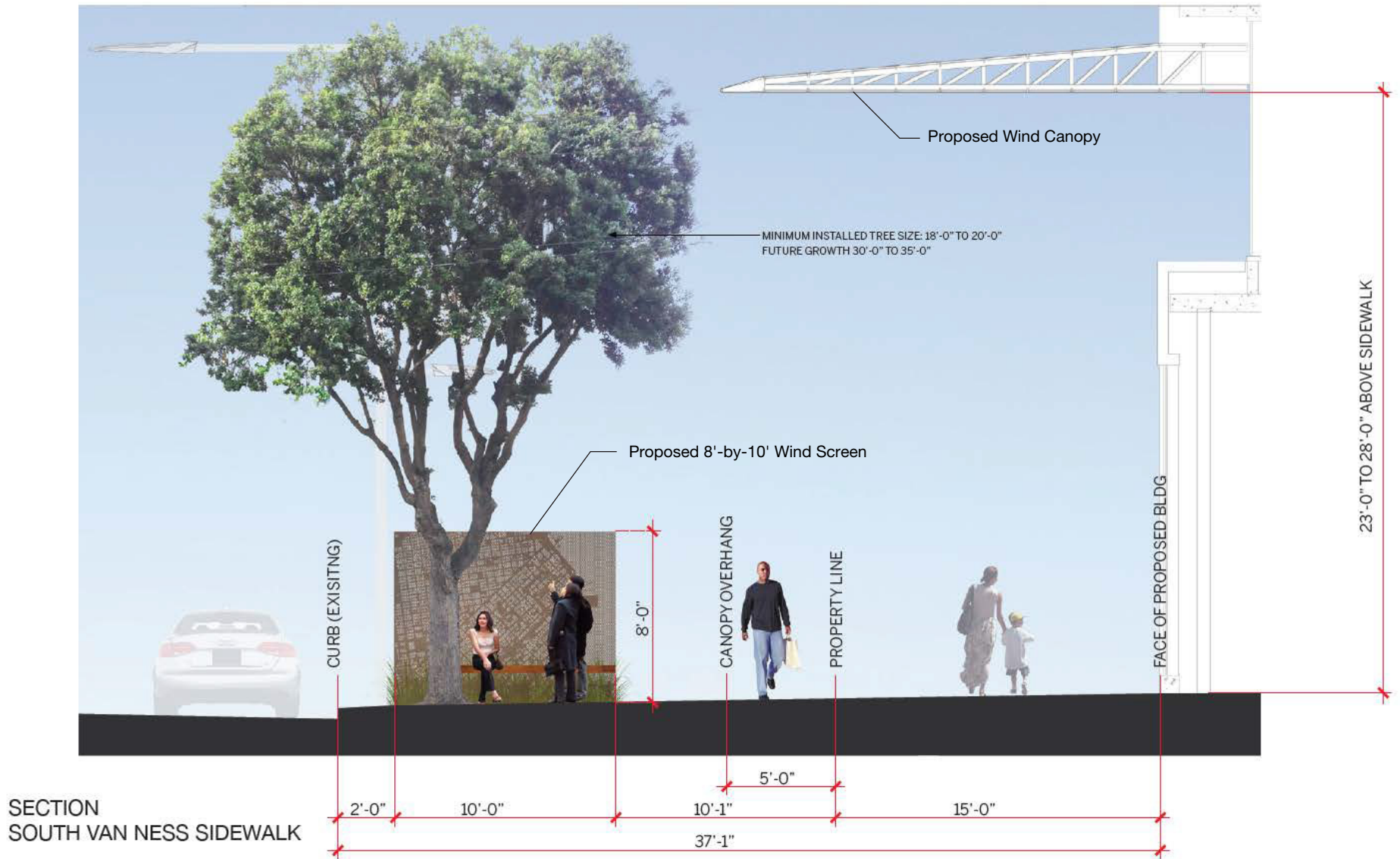
(primarily around the Mission/South Van Ness intersection and on 11th Street), decrease at 21 locations (primarily along both sides of South Van Ness Avenue, downwind of the site on Mission Street, and farther from the project site), and remain unchanged at the remaining nine locations also tested under existing conditions.” The increases in the wind speed exceeded 10 percent of the time, as measured in the pedestrian comfort analysis, would increase perceptibly along the project residential tower’s Mission Street frontage and along the northern portion of the project’s 11th Street frontage, and bicyclists could be expected to notice an increase in wind speeds, as well.

As stated on Draft EIR page II-23, as revised herein, and illustrated in Draft EIR Figure II-16, Draft EIR page 26, as well as in **Figure RTC-7, Proposed Wind Screen (Detail of Draft EIR Figure II-16)**, page RTC-56, herein, the proposed project would include a wind canopy that would surround the South Van Ness and Mission Street façades of the project’s residential tower at a height of between about 23 and 28 feet above the sidewalk. The wind canopy would be 20 feet wide on South Van Ness Avenue and 14 feet, 9 inches wide along Mission Street. It can be expected that the wind canopy, in addition to protecting pedestrians on the sidewalks surrounding the residential tower, would tend to slow winds and disperse them away from the tower. This is because wind effects of buildings result in relatively higher-speed winds at higher elevations being intercepted by the building and channeled down and around the building walls, accelerating as they descend. Anything that interrupts the flow of the wind rushing down the side of the building will result in lower ground-level wind speeds. This is why towers that are set back from building street walls tend to result in calmer wind conditions at the building base than buildings whose street walls are uninterrupted. The proposed project’s wind canopy would function much as a setback, resulting in lower wind speeds outboard from the canopy (as at the base of a building street wall with a setback tower above), including where a bicycle lane is planned on Mission Street (see below), as well as beneath the canopy, where the canopy would provide direct protection to pedestrians.

As stated above in the response to Comment TR-5, Bicycle Impacts, Market Street is the primary east-west route for bicyclists in the project area, and bicycle lanes are provided in both directions. Mission Street is a transit-preferential street and not heavily used by bicyclists, however, 11th Street between Market and Mission Streets, and Mission Street west of 11th Street serve as connector routes to bicycle facilities southwest of Market Street. As described on Draft EIR p. IV.B-50, the SFMTA’s Mission Street/South Van Ness Avenue/Otis Street Intersection Improvements and Muni Forward TTRP.¹⁴ projects include creation of a westbound bicycle lane on the north side of Mission Street between 11th Street and South Van Ness Avenue (the project block). Because the bicycle lane would be outboard of the right-turn lane, it would be 13 feet from the curb, or at least 5 feet farther from the project building than would a bicycle lane that is adjacent to a typical 8-foot-wide parking lane. This would offer some additional protection from any building effects on winds in the bicycle lane.

There is no bicycle lane on South Van Ness Avenue, nor is one planned or proposed, and South Van Ness Avenue has virtually no bicycle traffic.

In light of the above, no significant effects of wind on bicyclists are anticipated to result from the proposed project.



SOURCE: SOM, 2016

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-7
Proposed Wind Screen (detail of Draft EIR Figure II-16)

Comment WI-2: Request for Detail Regarding Wind Screens

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

I-Hestor.10

“Please explain and show on visual - **Figure II-16 - the proposed wind screens**. They are hard to understand/see.” (Sue C. Hestor; letter, January 4, 2017)

Response WI-2

The comment requests additional visual explication of the proposed wind screens on the South Van Ness Avenue sidewalk.

As described on Draft EIR page II-25, the proposed project would include “the installation of eight wind screens approximately eight feet tall by 10 feet wide at 40-foot intervals along the South Van Ness Avenue sidewalk adjacent to the project site and perpendicular to the street.” A typical wind screen, anticipated to be approximately 50 percent porous, is illustrated in the top image of Draft EIR Figure II-16, Draft EIR page 26. The wind screens are also visible in Figure II-22, Draft EIR page 35, which presents a view of the proposed project from South Van Ness Avenue. **Figure RTC-7, Proposed Wind Screen (Detail of Draft EIR Figure II-16)**, page RTC-56, and **Figure RTC-8, View of Proposed Wind Screens along South Van Ness Avenue (Detail of Draft EIR Figure II-22)**, page RTC-58, present enlargements of portions of Draft EIR Figure II-16 and Figure II-22 to more clearly depict the proposed wind screens.

Comment WI-3: Ongoing Wind Analysis in the Project Vicinity

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

I-Hestor.30

“There was **Chronicle article 1/1/17** about creating a wine district appellation for the ‘Windswept Petaluma Gap.’ The description of the wind tunnel through that area sounds like the wind pattern coming over the Hayes Street Hill down to Market Street and swirling around that area. Every market rate housing or office building in this area should be required to contribute funds for the CITY/Planning Department to maintain its own wind files so that the wind study is continually updated to include ALL construction.” (Sue C. Hestor; letter, January 4, 2017)



SOURCE: SOM, 2016

1500 Mission Street; Case No. 2014-000362ENV

Figure RTC-8

View of Proposed Wind Screens Along
South Van Ness Avenue (detail of Draft EIR Figure II-22)

Response WI-3

The comment states that the Planning Department should maintain its own wind-tunnel model and/or files supporting such a model.

Data on which wind-tunnel tests are based are routinely updated based on review of aerial photography and survey data, City data on building massing that is based on georeferenced aerial photography to allow for capture of accurate building massing, as well as building plans for new structures. Wind tunnel testing for CEQA analysis includes a cumulative scenario, where applicable, and Environmental Planning staff also reviewed proposed wind-tunnel test plans to ensure that current (under construction) and proposed projects are included in the testing for each project. For these reasons, the City or the Planning Department does not maintain a central repository for building data used in wind tunnel testing.

C.6 Shadow

The comments and corresponding responses in this section cover topics in Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment SH-1: Shadow Effects on Parks

Comment SH-1: Shadow Effects on Parks

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

I-Hestor.31

“Shadows related to current usage of parks - IV E-2. Since increased housing density and construction was planned for in the M/O Plan and EN Plan, it is inappropriate to assume continuation of the current hours of operation of parks. In a presentation by planners from Rec Park staff to the ENCAC, RecPark staff stated, with regard to Gene Friend Recreation Center, that the demand for new, especially morning hours, from residents coming into the area means that hours of operation would shift to accommodate families and those who exercise outdoors in the morning. Patterns have also changed in the Mission district. Shadow impacts during early morning hours should not so easily be disregarded. This effects application of the **Proposition K Sunlight Ordinance.**” (Sue C. Hestor; letter, January 4, 2017)

Response SH-1

The comment states that hours of City park operation and park usage patterns may change, and that this could affect shadow analysis under Section 295 of the *Planning Code* (Proposition K). The comment also states that early morning shadow must be thoroughly considered.

The hours of shadow analysis under *Planning Code* Section 295, added to the *Code* by Proposition K in 1994, are based on the sunrise and sunset times, not park operating hours. Shadow analysis for compliance with Section 295, as well as for CEQA review, extends from one hour after sunrise to one hour before sunset. (Before and after those times, shadow is so extensive and moves across the ground so quickly as to preclude useful analysis in most cases.)

It would be speculative to assume a change in hours at existing parks. Additionally, *San Francisco Park Code* Section 3.21(a) sets general operating hours for parks, absent site-specific regulations, at 5:00 a.m. to 12:00 midnight daily.

As stated on Draft EIR page IV.E-20, the proposed project would cast new shadow on a portion of Patricia’s Green between 7:30 a.m. and 8:30 a.m. from January 27 through March 1 and again from October 13 through November 15, or approximately 12 weeks during the course of a year. Shadow would last no more than 23 minutes on any given day, and would never occur after 8:40 a.m. Because usage of Patricia’s Green is not as extensive at this time of day as at other times of day, and because the duration of new project shadow over the course of both the year and each day, when applicable, is limited, the project’s shadow impact was determined to be less than significant.

C.7 Alternatives

The comments and corresponding responses in this section cover topics in Draft EIR Chapter VI, *Alternatives*. These include topics related to:

- Comment AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives
- Comment AL-2: The EIR Should Analyze an Alternative With Less Parking
- Comment AL-3: The EIR Should Analyze an Alternative With More Affordable Housing
- Comment AL-4: Concurrence with EIR Analysis of Full Preservation Alternative

Comment AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives

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

A-HPC.2

“The HPC [Historic Preservation Commission] agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response AL-1

The comment expresses general concurrence with the Draft EIR’s analysis of preservation alternatives. The comment will be transmitted to City decision-makers for consideration in their deliberations on the proposed project. The preservation alternatives would not avoid the significant and unavoidable cumulative construction transportation impacts identified in the Draft EIR.

Comment AL-2: The EIR Should Analyze an Alternative with Less Parking

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

I-Hestor.4

“Project Alternatives must be increased

“The summary of alternatives(S-35) omits an **Alternative with drastically reduced residential parking. It must be added.** Another alternative with ZERO parking, but very expanded car share parking.

“Van Ness - highway 101 - has a high volume of traffic, including trucks. With BRT lanes being added, vehicle traffic becomes more constrained. As new residential projects are approved, developers of market rate housing request more and more parking because the units sell for more money. As the City accommodates each request, the cost of land goes up. It is priced ASSUMING the maximum amount of parking. Housing prices go up. **Has the City done a study of what effect eliminating parking on this transit corridor would**

have on housing prices? How much are prices increased when the maximum amount of parking, versus ZERO residential parking, is provided? (Sue C. Hestor; letter, January 4, 2017)

Response AL-2

The comment requests analysis in the EIR of alternatives that would provide less residential parking and no parking (other than car-share parking). The comment also asks about the cost of providing parking in development of residential units. The comment, however, does not suggest that a reduced parking or no parking alternative would avoid or mitigate any potentially significant environmental impacts of the proposed project while meeting most of the project sponsor's objectives, or be more feasible than the alternatives analyzed in the Draft EIR (CEQA Guidelines, Section 15204 (a)).

As stated on page VI-1 of the Draft EIR, Section 15126.6(a) of the CEQA Guidelines provides that "[a]n EIR need not consider every conceivable alternative" to a project. Under the "rule of reason" governing the selection of the range of alternatives, the EIR is required "to set forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines, Section 15126.6 (f)). This section also requires the presentation of a reasonable range of alternatives. Although an EIR must consider a reasonable range of potentially feasible alternatives, it does not have to identify and analyze alternatives that would not meet most of the project sponsor's basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, or alternatives that do not further reduce or eliminate significant impacts of the project. In identifying alternatives, the consideration of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)). The alternatives identified and evaluated in the Draft EIR were developed on this basis.

The comment also states that the Draft EIR should analyze a project not requiring a Conditional Use Authorization for automobile parking (i.e., reduced parking alternative) or a no parking alternative. The Draft EIR did not identify a significant effect on the environment due to a substantial parking deficit that could create hazardous conditions or cause significant delays affecting transit, bicycles, or pedestrians and where particular characteristics of the project or its site demonstrably render use of other modes infeasible. Therefore, the Draft EIR was not required to identify a reduced or no parking alternative.

In addition, the Draft EIR does analyze an alternative with substantially reduced parking—the Full Preservation Alternative. The Full Preservation Alternative would provide a total of 142 parking spaces compared with up to 414 spaces for the proposed project. As stated on Draft EIR page VI-29 (and summarized in Table VI-1, Draft EIR page VI-6), the Full Preservation Alternative "would have only one level of below-grade parking beneath both the office and permit center component and the residential retail/restaurant component. As a result, this alternative would provide approximately 25 vehicle parking spaces for offices and 117 vehicle parking spaces for residential use; the latter would represent a ratio of 0.25 spaces per dwelling unit, which is the maximum principally permitted (without Conditional Use authorization) in the existing Van Ness & Market Downtown Residential Special Use District." The Full Preservation Alternative would provide residential parking at one-half the rate of the proposed project (one space per four dwelling units, as opposed to one space per two units with the project), and in total would provide less than half the

residential parking of the proposed project, as well as less office parking (25 spaces versus up to 120 spaces with the proposed project).

An alternative that considers no parking for the project's City office building component was not analyzed in the Draft EIR because most of the proposed office parking would accommodate City vehicles that are used daily by inspectors and other City personnel who make off-site field trips (for building inspection and other official business), and these vehicles are already accommodated in the project vicinity at present, including some that are parked on the project site in spaces leased by San Francisco Public Works.

Additionally, accommodating City vehicles on the project site is a City objective identified in the Draft EIR and would not result in more vehicle use by City employees. A No Parking Alternative would also fail to satisfy Objective 3 of the City's office and permit center component of the project: "Provide approximately 120 off-street parking spaces to accommodate vehicles used by inspectors and other City personnel who make off-site field trips, as well as parking for members of the public visiting the permit center and other City offices."

An alternative that considers no residential parking was not considered because such an alternative would fail to meet the project objective of developing a financially feasible project, and would fail to reduce the significant and unavoidable impacts of the proposed project. Moreover, while the proposed project includes a proposed Mission and South Van Ness Special Use District that would replace the existing Van Ness & Market Downtown Residential Special Use District on the project site and would allow for a residential parking ratio of one parking space per two dwelling units (0.5 spaces per unit), even the existing special use district allows for one parking space per four units (0.25 spaces per unit) as a principal use without conditional use authorization, which is the parking ratio included in the Full Preservation Alternative, as described above.

Additionally, the project site is underlain by liquefiable soil and in order to develop the structures as part of the project objectives this soil must be excavated, as is currently proposed under the project's proposed two-basement development concept, or another foundation system employed, such as soil improvement with deep soil mixing (in which the poor-quality soil is strengthened by mixing with a cementitious slurry) or the installation of drilled displacement columns that gain support from the dense sand layer below the liquefiable soil. Given the subsurface conditions, according to the project sponsor, excavation of the unsuitable soil is the most efficient means of achieving an appropriate bearing surface to support the proposed buildings; because the greatest amount of excavation is required at the south end of the project site, primarily beneath the proposed residential building, one or more basement levels would most appropriately be constructed where the excavation would occur. Soil improvement or a deeper foundation system that would be required were the liquefiable soil not to be excavated could potentially increase project construction costs.

Effects on housing prices due to elimination of parking are not physical environmental impacts. For informational purposes, it is noted that the Planning Department estimates each residential parking space adds \$20,000 to \$30,000 to the cost of developing a unit of housing, and even more in certain parts of the City.⁹ If this cost is passed on directly to a resident, the cost of that dwelling unit would increase accordingly, beyond what the cost would be without parking. Section 167 of the *San Francisco Planning Code* requires that for new residential buildings of 10 units or more, parking spaces be leased or sold separately from the rental

⁹ "What is the Problem with Parking." Available online at <http://sf-planning.org/what-problem-parking>. Reviewed February 17, 2017.

or purchase cost of the unit. This requirement, known as unbundled parking, exists, according to Section 167, so that “potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space.”

The Draft EIR evaluated a reasonable range of alternatives, as required by CEQA, that allows City decision-makers and the public to evaluate and compare the potential impacts of the proposed project with other similar development scenarios designed to lessen the project’s environmental effects. It is noted that reducing the number of on-site parking spaces would be unlikely to result in any increased environmental impacts; therefore, the Planning Commission could approve the proposed project or an alternative with no changes other than a reduction in on-site residential parking, if desired. Additionally, as described above, the Draft EIR did consider an alternative with reduced parking—the Full Preservation Alternative.

Comment AL-3: The EIR Should Analyze an Alternative with More Affordable Housing

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

I-Hestor.5

“The summary of alternatives also omits an alternative with 25% inclusionary housing. This should also be included. The project is an SUD. A search of the *Planning Code* for SUDs will show that historically an SUD, which changes *Planning Code* requirements for a small area, has been used for 100% affordable housing projects. 20% is headed in the right direction, but there should also be a 25% on-site inclusionary alternative.” (Sue C. Hestor; letter, January 4, 2017)

Response AL-3

The comment requests analysis in the EIR of an alternative with a greater percentage of on-site affordable housing (25 percent) than the project’s proposed 20 percent.

As stated on page VI-1 of the Draft EIR, Section 15126.6(a) of the CEQA Guidelines provides that “[a]n EIR need not consider every conceivable alternative” to a project. Under the “rule of reason” governing the selection of the range of alternatives, the EIR is required “to set forth only those alternatives necessary to permit a reasoned choice” (CEQA Guidelines, Section 15126.6 (f)). This section also requires the presentation of a reasonable range of alternatives. Although an EIR must consider a reasonable range of potentially feasible alternatives, it does not have to identify and analyze alternatives that would not meet most of the project sponsor’s basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, or alternatives that do not further reduce or eliminate significant impacts of the project.

An alternative with 5 percent more affordable housing on site would not have substantially different environmental impacts, if any. The Planning Department’s analysis methodologies do not consider the income of project residents when calculating travel demand, air pollutant emissions, or other quantifiable impact measures. Other qualitative analyses of effects such as those on historic architectural resources, wind, and shadow are a function of the site location and the proposed building massing and would likewise not be altered by a change in assumed residential income levels.

Comment AL-4: Concurrence with EIR Analysis of Full Preservation Alternative

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

O-Heritage.⁷

A-HPC.³

“Heritage’s comments on the NOP, dated March 17, 2015, requested consideration of ‘at least one bona fide preservation alternative in the EIR that attempts to meet most of the project objectives while retaining the Old Coca-Cola Bottling Plant’s eligibility as a historical resource... including an increased setback behind the historic clock tower, retention of the full length of the 11th Street façade, and/or adaptive reuse of a portion of the current warehouse space.’¹⁰

“The Full Preservation Alternative largely meets these criteria, as it would preserve exterior features of the Coca-Cola Building and a substantial portion of the industrial warehouse section of the building, including wire-glass skylights, exposed steel truss work/structural framing, and the full-height interior space that would remain intact as part of the first floor permit center. It would also retain the Mission and 11th Street facades in their entirety, and a new office tower would be constructed at the rear northwest corner of the existing building.

(Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] concurs that the Full Preservation Alternative meets the Secretary of Interior’s Standards.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response AL-4

The comments express general agreement with the Draft EIR’s conclusion with respect to the Full Preservation Alternative. With regard to the note provided by the comment’s footnote, the term “preferable” is used in the context of historic resources, and does not represent the environmentally superior alternative as discussed under Draft EIR Chapter VI, *Alternatives*. The comments will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

¹⁰ The DEIR includes a Partial Preservation Alternative and a Full Preservation Alternative. The Partial Preservation Alternative is preferable to the proposed project in that it reduces adverse impacts on historic resources, but not to a less than significant level.

C.8 Initial Study Topics

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment LU-1: Effects on Neighborhood Character
- Comment PH-1: Housing Displacement
- Comment PH-2: Housing for Project Employees

Land Use

Comment LU-1: Effects on Neighborhood Character

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

I-Rhine.1
I-Hestor.6

“Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity.

“LTS None required. NA

“The EIR states:

The proposed 39-story, 396-foot-tall tower (416 feet to top of parapet) residential and retail/restaurant building would be taller than the buildings located to the south and west on Mission and Minna Streets, but would be similar in height to other buildings along Market, 11th, and 10th Streets to the north and east. **Although the 39-story tower would be substantially taller than the low-rise residential buildings in the area to the south around Lafayette, Minna, and Natoma Streets;** given the layout of the street grid, the tower would only be visible in views north from Lafayette Street. The existing buildings located along the 35-foot-wide Minna and Natoma Streets would obscure views of the tower, except where a few single-story buildings are located on the north sides of those streets. Furthermore, this low-rise residential area would continue to be surrounded by low-scale buildings to the east, west, and south; therefore, **the 39-story tower would not substantially alter the character of this area. The proposed 16- story office building would be taller than buildings to the south and west,** but similar in height to buildings directly north and east of the proposed project. Therefore, the proposed project would be generally consistent with the overall existing height and massing of buildings in the area. The proposed project would also establish a mixed-use building and office building in proximity to other similar mixed-use and office buildings, and would not introduce an incompatible land use to the area. The proposed project would contain land uses that are consistent and compatible with surrounding land uses, **and would be in keeping with the existing character of the urban fabric of the neighborhood.** Therefore, the proposed project would have a less than-significant impact upon the existing character of the vicinity and no mitigation measures are necessary.

"Comment:

"Our neighborhood is located directed south of the project site (less than 75 feet) and is part of the Western SOMA plan area, zoned Residential Enclave District (RED) with a height district 40-X. During hearings before the Planning Commission for the Market Octavia Plan, our neighborhood association, Lafayette, Minna and Natoma neighborhood association (LMN) expressed concern that the proposed plan height district at Mission and South Van Ness (then 320') would be out of scale with the height district of the Western SOMA plan (RED). Nowhere else in the city does such a sharp transition of height districts occur, and at the time of the passage of the Market Octavia Plan the San Francisco Planning Commission assured the LMN neighborhood association that consideration would be given to that issue as future projects came forward.

"Now the proposed height will increase to over 400 feet. We understand the reasons for the proposed increase, however the EIR did not address the impact to the character of the area (Impact LU-3 above), merely stating, 'The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood.' The figure below shows how close the proposed project is to our residential area. Mission Street does not provide enough separation between a 400+ foot tower and 40 foot residential apartments. At a project information meeting I was told that the tower would not be located further north on the project site because of the wind impact, however no alternative location of the tower was considered. Could it have been further north and then set back on the parcel to the east?" (Robert Rhine; e-mail, December 6, 2016)



...

"Comments by residents of residential area south of Mission were ignored. DEIR I-3 states that comments at the public scoping meeting are incorporated into this DEIR. Residents of the LMN neighborhood - Lafayette, Minna, Natoma directly across from the project - raised serious questions on the abrupt height changes proposed. They live in the area covered by the Western SoMa Area Plan and had participated in the recent hearings on that Plan which aimed to guarantee protection of housing for existing lower income residents.

They raised the issue of driving “apps” that direct Uber, Lyft, and private drivers that to a short-cut through their narrow streets to avoid South Van Ness or 11th Street traffic. These issues do not come through in the DEIR.” (Sue C. Hestor; letter, January 4, 2017)

Response LU-1

The comments state that the character of the Lafayette, Minna, and Natoma (LMN) residential neighborhood south of the project site could be adversely affected by the proposed project’s 400-foot residential tower.

As stated in the text by the first commenter, from page 40 of the Initial Study (Draft EIR Appendix A), the 400-foot residential tower would not generally be visible from Minna or Natoma Streets, although it would be clearly visible from Lafayette Street. As stated by the commenter, height limits to the east, south, and west of the LMN neighborhood are considerably lower—generally 55 feet or less. Therefore, most new development would remain low-rise within the LMN residential neighborhood. Additionally, there is a 120-foot zone on the west side of Lafayette at Minna. These lower height limits would serve to limit the overall change in the character of the LMN neighborhood. While the proposed project would introduce a 400-foot tall tower to the north of the neighborhood, neither the proposed project nor other cumulative development would substantially affect the neighborhood, inasmuch as only the 400-foot tower would be nearby and only to the north. It is noted that the areas of 40- and 55-foot height limits in the LMN neighborhood are not immediately across Mission Street from the proposed project, but rather is separated by a row of buildings on the south side of Mission Street that are in an 85-X height and bulk district, which allows buildings up to 85 feet in height. This means that the distance from the proposed residential tower to the interior of the LMN neighborhood and its 40-foot height limit is about 170 feet, or approximately twice the width of Mission Street. Together with the greater height limit and several existing multi-story buildings on the south side of Mission Street, this separation would provide some buffer from the proposed project’s residential tower. Moreover, shadow effects of the proposed residential tower on the LMN neighborhood would be limited because of the tower’s location being generally to the north and the relatively narrow streets in the neighborhood, which allow existing buildings to cast substantial morning and afternoon shadow across the streets.

It is further noted that areas west and northwest of the Market and Van Ness intersection—where the Market & Octavia Area Plan’s greatest height limits exist—are situated similarly to the proposed condition of the LMN neighborhood, with height limits of 400 feet separated from residential neighborhoods with 40- and 50-foot height limits and with an intermediate zones of 85- to 120-foot height limits to provide a buffer between the greatest heights and the lesser heights of residential areas.

Regarding the potential for relocation of the residential tower on the project site, while some relocation may be possible, the distance that the residential tower could be moved to the north and east is limited by (1) the hazardous wind standard in *Planning Code* Section 148 (in wind tunnel tests it was determined that the two building facades along South Van Ness must maintain a certain minimum separation in order to avoid a continuous vertical “wall,” which negatively impacts wind conditions), and (2) the tower separation requirements of *Planning Code* Section 270(f)(3) (existing Van Ness & Market Downtown Residential Special Use District) and proposed Section 270(g)(1)(C) (proposed Mission and South Van Ness Special Use District).

Concerning the Western SoMa height limits and the LMN neighborhood, see Response PP-4, page RTC-18.

Concerning the potential for traffic “short-cuts” through the LMN neighborhood, see Response PP-7, page RTC-22.

Population and Housing

Comment PH-1: Housing Displacement

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

I-Hestor.35

“Population and Housing - page 31. See discussion above. As the price of housing goes up and reverse commuters find the location attractive because San Francisco is providing more housing than the peninsula, SF EMPLOYEES are forced out of SF to locations to a great extent in the East Bay which has cheaper housing. Escalating land values in SF displace residents both directly (removal) and indirectly (inadequate housing added).” (Sue C. Hestor; letter, January 4, 2017)

Response PH-1

The comment states that increased housing costs in San Francisco have resulted in displacement of San Francisco employees to areas with lower-cost housing.

As stated on page 33 of the Initial Study (Draft EIR Appendix A), “The proposed project would not displace any residents or housing units, since no residential uses or housing units currently exist on the project site.” Additionally, implementation of the City’s Inclusionary Affordable Housing Program requirements (*Planning Code* Sections 415 et seq.) results in new market-rate housing also funding or developing below-market-rate (BMR) residential units, as well—units that would not be added to the housing supply but for the production of market-rate units that are subject to the Inclusionary Affordable Housing Program.”

As stated on Draft EIR page II-23, the proposed project would include 20 percent on-site inclusionary affordable units, available to residents earning a maximum of 50 percent of the average median income. These 112 affordable units would not be built but for the proposed project. Accordingly, the Initial Study finds that the proposed project would not displace jobs and effects related to displacement would be less than significant.

Comment PH-2: Housing for Project Employees

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

I-Hestor.36

“Where are the people who WORK on site going to be housed? Page 32 ignores them.” (Sue C. Hestor; letter, January 4, 2017)

Response PH-2

The comment states that the Draft EIR does not analyze effects related to housing for employees of the proposed project.

The Initial Study evaluates the employment associated with the proposed project. The project is anticipated to generate approximately 109 new retail/restaurant jobs and would generate approximately 1,643 City employee jobs (including the 13 childcare facility employees), the majority of whom are anticipated to already work in nearby existing City office buildings in the project vicinity and would relocate to the new office component at the project site. As also stated in the Initial Study, if existing space occupied by City offices were to be backfilled with the same number of employees, those new employees would constitute less than 10 percent of the employment growth forecast for San Francisco between 2010 and 2040. Thus, this growth is already planned for. The proposed project's 560 dwelling units—including 116 affordable units that would be built on-site—would themselves offset some portion of the housing demand from this growth.

C.9 Other CEQA Considerations

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*. These include topics related to:

- Comment OC-1: Request for an Aerial View of the Proposed Project
- Comment OC-2: Coordination of Responses to Comments for two Draft EIRs.

Comment OC-1: Request for an Aerial View of the Proposed Project

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

I-Hong.²

“Even though current CEQA does not require images renderings and etc. of the project. I disagree with this CEQA issue only because all too often words, black and white elevations describing the design does not present what it will look like. I believe all too often projects fail because of this missing link. However, this DEIR does an excellent job with this process and is a positive Plus for its justification and uniqueness to this blighted area. Granted, design, color and materials are personal. But I studied and practiced both architecture and urban design and now retired. To add just one link to this presentation it would be to insert the project in to an aerial photo showing how these projects would look with the existing environment. The birds eye figure does some of this - but the photo and the proposed project to me - would be a spot on.” (Dennis Hong; e-mail, January 3, 2017)

Response OC-1

The comment commends the Draft EIR’s presentation of figures describing the proposed project but asks if it is possible to present an aerial rendering of how the proposed project, along with other nearby proposed projects, would appear.

In general, for CEQA purposes, the Planning Department presents ground-level views (plans and renderings) of a proposed project because those represent pedestrian-level views that would be available to most observers. An aerial image would not add to the relevant descriptive information presented in the Draft EIR.

Comment OC-2: Coordination of Responses to Comments for two Draft EIRs

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

I-Hestor.¹

“There are 2 DEIRs out for development on blocks diagonally across Market and Van Ness/South Van Ness at virtually the same time:

“Comments and Responses on TWO DEIRs should be coordinated

"1500 Mission St - southern half of AB 3506 2014-000362 - City office building, dense market rate housing, on-site inclusionary housing, Planning Code and height increase, parking. DEIR hearing 12/15/16, Comment DL [deadline] 1/4/17.

"One Oak Street/1500 Market St - eastern portion of AB 836 2009.015E - Dense market rate housing, Planning Code and height increase, parking. DEIR hearing 1/15/17, Comment DL 1/10/17.

"The issues of wind, traffic, transit, impacts on pedestrians, changes in the General Plan and Planning Code TO THE SAME Van Ness & Market Downtown Residential Special Use District - part of the Market/Octavia Area Plan - have EXTREMELY similar impacts, including cumulative impacts. Market and Van Ness. Mission and South Van Ness. DIAGONAL BLOCKS. Sites about 400' apart.

"The deadline for DEIR comments are less than a week apart. There is no rational reason why public comments on the 2 DEIRs that have applications to BOTH projects should not be considered by both.

"This specifically includes issues related to transportation and parking, winds, comments on cumulative displacement and housing, including excessive parking in this transit-rich area with heavy traffic GOING STRAIGHT ONTO FREEWAYS. The high parking allowance for residences encouraging occupancy by middle and upper income people who drive instead of using public transit.

"Environmental Review is ignoring these issues unless comments on issues relevant to both sites are considered in BOTH Comments and Responses/FEIRs.

"Since sending [the above] comments, I received an Advance Calendar which shows they are slated for approval within 2 weeks of each other. 1500 Mission is slated for approval March 23. One Oak/1500 Market on April 6. It is therefore more compelling that DEIR comments on issues common to both be considered whether they are submitted on 1500 Mission or One Oak/1500 Market." (Sue C. Hestor; letter, January 4, 2017)

Response OC-2

The comment appears to request that public comments on this Draft EIR and on the Draft EIR for the One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) be responded to jointly.

The proposed 1500 Mission Street project—the subject of this Draft EIR—and the nearby proposed project at One Oak Street are separate projects with separate sponsors and separate objectives. CEQA requires analysis of a proposed project; it is not permissible to conflate the effects of two projects, as it would be impossible to differentiate the effects of each project. Because the Planning Commission and other approving bodies must separately consider each project for approval, each project's individual impacts must be separately described in its own EIR in order to have a valid project description under CEQA. Also, each project's impacts must be separately described and analyzed to provide the decision-makers with adequate information upon which to base a decision to approve or disapprove each project.

At the same time, CEQA requires a cumulative analysis, which evaluates impacts "created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (CEQA Guidelines Section 15130(a)(1)). Both this Draft EIR and the Draft EIR for the One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E) contain a robust cumulative impact analysis that includes not only the other of these two projects, but also considers many other cumulative projects in the vicinity. The cumulative

impact analysis also considers forecast growth citywide and region-wide, where applicable, depending on the environmental topic evaluated, such as wind, shadow, and transportation and circulation.

It is also noted that the Market & Octavia Neighborhood Plan EIR (Case No. 2003.0347E; Final EIR certified April 5, 2007) evaluated the programmatic impacts of implementing high-density, high-rise development at and near the intersection of Market Street with Van Ness Avenue and South Van Ness Avenue. The 1500 Mission Street project, which is the subject of this EIR, proposes to implement a portion of the development analyzed in the Market & Octavia EIR, although with a different arrangement and height of buildings than analyzed in the Market & Octavia EIR. This is also true for the proposed One Oak Street Project (1500–1540 Market Street; Case No. 2009.0159E; Draft EIR published November 16, 2016), as well as for approved projects including 1601 Mission Street (Case No. 2014.1121ENV) and 1546–64 Market Street (Case No. 2012.0877E) and several other relatively larger projects currently undergoing environmental review (10 South Van Ness Avenue; Case No. 2015-004568ENV, 30 Otis Street; Case No. 2015-010013ENV, and 1629 Market Street; Case No. 2015-005848ENV). A complete list of cumulative projects within 0.25 mile of the project site can be found in Table IV-1 (page IV-9 of Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*).

See also responses to specific cumulative comments regarding transportation (Comment TR-7).

C.10 General

The comments and corresponding responses in this section cover topics in Draft EIR Chapter II, *Project Description*, and Draft EIR Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*. These include topics related to:

- Comment GC-1: Project Merits
- Comment GC-2: Support for Approval of the Full Preservation Alternative
- Comment GC-3: Timing of Release of Draft EIR, and other Draft EIRs
- Comment GC-4: Cumulative Projects List and Map
- Comment GC-5: Limiting Construction Impacts
- Comment GC-6: Triangle at 12th Street and South Van Ness Avenue

Comment GC-1: Project Merits

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

I-Hong.1

I-Hestor.20

A-HPC.5

I-Hong.7

O-Heritage.1

I-Hong.10

O-Heritage.5

"I fully support this project. This Draft EIR is very comprehensive and covers just about all the issues and has done an excellent job because it shows.

...

"I like the step down and separation of the towers. The renderings does an excellent job with communicating what this will look like, vs black and white elevations. (Just a simple CEQA issue. I believe this issue is being currently reviewed with CEQA and may be a requirement down the road). Figures 11-17 thru 11-22 says it all. The proposed public open space is another positive to this project.

...

"As I mentioned earlier, I fully support this project. This semi blighted area needs this project and others so it can continue to develop others in this area." (Dennis Hong; e-mail, January 3, 2017)

"**Accountable Planning Initiative - Prop M 1986. DEIR III-14.** Allowing increased parking - much more than REQUIRED for housing in an area that defines TRANSIT RICH, and which has really close access to the freeway system, is opposite of discouraging commuter automobiles. Particularly when there is an existing lower income neighborhood *directly across the street*."

...

"**Adequacy of parking - page 23.** The issue in this project is not whether there is ENOUGH parking but whether there is TOO MUCH in the residential building." (Sue C. Hestor; letter, January 4, 2017)

“Despite notable design improvements [since an earlier iteration of the proposed project], including greater retention of the Mission and 11th Street façades, the project as currently proposed would still demolish approximately 90% of the historic Coca-Cola Building.¹ As the future home of the Planning Department and related city agencies, Heritage believes that the project has heightened symbolic importance: We are concerned that the current design would encourage “façadism” as a preferred preservation treatment for historic resources citywide, when this practice undermines preservation values and can result in a false sense of place.”

...

“Heritage believes that the preservation treatment of the Coca-Cola Building should be held to a high standard because of the example it will set for the broader development community in San Francisco. Indeed, if façade retention is adopted as the preferred solution for the Departments of Planning, Building Inspection, and Public Works, the city’s credibility to curb this practice in projects seeking their approval will be significantly compromised. It will be difficult for the Planning Department to require retention of historic resources if the city itself does not adhere to sound preservation practice.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] generally agreed with San Francisco Heritage’s statement about the symbolic importance of this project and its potential to compromise the credibility of the City’s preservation program with a façade retention project as the future headquarters of several City Departments, including Planning. The HPC President noted, further, that he hopes that the Planning Commission will be very thoughtful in their deliberations about the project and consider what the project says about the City’s interest in preserving historic resources.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response GC-1

The comments express both support for and opposition to approval of the proposed project. Some comments express concern that approval of the proposed project could potentially provide implicit endorsement of façade retention as a City-supported approach to historic preservation.

Comments in support of and in opposition to the proposed project are noted and will be transmitted to City decision-makers for consideration in their deliberations on the project.

Regarding the Partial Preservation Alternative analyzed in the Draft EIR beginning on page VI-10 and its consistency with the HPC’s direction, as noted on that page, the Partial Preservation Alternative “would retain the entirety of both the Mission Street and 11th Street facades of the 1500 Mission Street building as part of the office and permit center component of the development.” As a result, this alternative “would maintain most of the exterior character-defining features of the existing 1500 Mission Street building.” The Partial Preservation alternative would add a second story to the existing 1500 Mission Street building, set back about 38 feet from Mission Street and approximately 29 feet from 11th Street. The City office building would step up to seven

¹ The project as currently proposed would demolish the western end of the Mission Street façade as well as a portion of the 11th Street façade.

stories behind the two-story addition at a distance of approximately 111 feet from the Mission Street façade, and the building would rise up to 16 stories beginning about 180 feet back from the Mission Street façade. The tower would be set back approximately one structural bay from the east (11th Street) elevation of the existing building. Thus, the retention of the street-facing facades and the setbacks from these facades attempt to respond to the HPC's direction.

Comment GC-2: Support for Approval of the Full Preservation Alternative

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

O-Heritage.2
O-Heritage.6

O-Heritage.8
A-HPC.4

"Heritage joins the Historic Preservation Commission in urging the Planning Department to adopt the Full Preservation Alternative as the environmentally superior (and ostensibly feasible) project alternative.²

...

"The Full Preservation Alternative substantially lessens impacts on historic resources while achieving most project objectives.

"A key policy under the CEQA is the lead agency's duty to 'take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.'⁶ CEQA 'requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.'⁷ The fact that an environmentally superior alternative fails to meet all project objectives does not necessarily render it infeasible under CEQA; reasonable alternatives must be considered 'even if they substantially impede the project or are more costly.'⁸ CEQA requires that a project determined to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.⁹ To this end, CEQA mandates that the lead agency deny the proposed project if less harmful alternatives would feasibly obtain most of the basic objectives.

...

"Significantly, the DEIR identifies the Full Preservation Alternative as the 'environmentally superior alternative;' because 'it would meet most of the project sponsor and City's basic objectives, while avoiding the cultural resource impact to the 1500 Mission Street building that would occur under the proposed project.'¹¹ The Full Preservation Alternative would not only achieve a majority of the programmatic goals, but would also enable the city to 'lead by example' by demonstrating how high-density new construction can sensitively

² At its regular meeting on December 7, 2016, the Historic Preservation Commission unanimously voted to endorse the Full Preservation Alternative.

⁶ Public Resource Code, Sec. 21001 (b), (c).

⁷ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁸ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline §15126(d)(1).

⁹ Cal. Public Resources Code § 21002, 21081.

¹¹ DEIR, at p.S-37 (emphasis added).

retain and adapt historic structures.” (Mike Buhler, San Francisco Architectural Heritage; letter, January 4, 2017)

“The HPC [Historic Preservation Commission] agreed that they recommend adoption of the Full Preservation Alternative as it avoids significant impacts to the historic resource by retaining the majority of character-defining features and allows the building to continue to convey its significance while also allowing for adaptive use and new construction to accommodate many of the project objectives.” (Andrew Wolfram, San Francisco Historic Preservation Commission; letter, December 14, 2016)

Response GC-2

The comments express support for adoption of the Full Preservation Alternative, rather than the proposed project. The commenters’ support for adoption of the Full Preservation Alternative is noted and will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

Comment GC-3: Timing of Release of Draft EIR, and other Draft EIRs

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

I-Hestor.8

“I note that the **55-day public review and comment period on this DEIR (DEIR I-5)** began with DEIR release 11/9, the day after the Presidential election, Planning hearing was at **10am** 12/15, the last Planning Commission meeting before Christmas with comments due 1/4/17, one day after people return from the holidays. This is a brutal approach to holidays, especially when the One Oak/1500 Market DEIR was released hot on its heels. Not to mention release of the Central SoMa Area Plan (3rd version of the Eastern Neighborhoods Area Plan) came out in December.”

“Environmental Review appears to enjoy dumping massive DEIRs on the public over Thanksgiving and Christmas holidays.” (Sue C. Hestor; letter, January 4, 2017)

Response GC-3

The comment states that the schedule for public review of the Draft EIR coincided with the holiday season and overlapped with review periods for other EIRs.

As noted by the commenter, the public review period for the Draft EIR was 55 days, which is 10 days longer than the required 45-day Draft EIR review period (Public Resources Code Section 21091). The review period was extended because a normal 45-day period would have resulted in the review period ending on December 24; therefore, the comment period was extended until after the holiday season to allow the public additional time to review and comment on the Draft EIR.

Regarding the time of the start of the Draft EIR public hearing at the Planning Commission at 10:00 a.m., Planning Commission meetings typically are scheduled to begin at 12:00 noon. However, occasionally, a very full Planning Commission calendar or joint hearings on a particular item on the calendar item compels a 10:00 a.m. meeting start. In the case of the December 15, 2016, public hearing on the Draft EIR, this was held at

a 10:00 a.m. meeting because the Planning Commission was scheduled to hold a joint meeting with the Recreation and Park Commission at 1:00 p.m. for consideration of the Recreation and Park Department's Significant Natural Areas Management Plan and Final EIR.

It is also noted that the public review period for the Central SoMa Plan EIR was also extended, from 45 to 61 days.

Comment GC-4: Cumulative Projects List and Map

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

I-Hestor.23

I-Hong.5

"Cumulative Land Use Project List - IV-9 - specify which of the projects are already approved or open." (Sue C. Hestor; letter, January 4, 2017)

"The Cumulative Land Use:

"The Table IV-1 page IV-9 shows there are 22 Projects/work to be done in this 0.25 mile area-Nov 2016. [- 24 Months (2 years) for this massive 1500 Mission project - page II-28. (I recall there was a much longer time shown for this project but was unable to find it).]

"a. Can project time lines be shown for each of these projects on this Table IV-1?

"b. Can the following project also be shown on this chart:

"- San Francisco MTA/MUNI - BRT project." (Dennis Hong; e-mail, January 3, 2017)

Response GC-4

With regard to the comment's request for clarification regarding the cumulative land use list (Table IV-1 in Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*), it would be infeasible to provide specific construction schedules for every project, as the information is not readily available. Information regarding the Cumulative Land Use List project approval and construction status is available and described as follows. Of the projects listed in Table IV-1, those completed include 101 Polk Street (Case No. 2011.0702E), 1 Franklin Street (Case No. 2008.1328E), and 104 Ninth Street (also known as 1321 Mission Street) (Case No. 2011.0312E). These projects were under construction at the time the Notice of Preparation was issued.

Approved projects under construction include 22 Franklin Street (Case No. 2013.1005E) and 1563 Mission Street (2014.0095E).

Approved projects not yet under construction include 1601 Mission Street (2014.1121ENV), 1740 Market Street (Case No. 2014.0409E), 915 Minna Street (Case No. 2015-002600ENX), and 1532 Howard Street (Case No. 2013.1305E).

Regarding the Van Ness Avenue Bus Rapid Transit (BRT) project, this project is not included in Table IV-1 because this table lists only "land use projects"; that is, projects proposed to develop residential, office, retail,

hotel, and similar uses. However, the Van Ness BRT project is discussed, along with other planning and transportation projects, on pages II-11 and IV-12. It is noted that, since publication of the Notice of Preparation, construction has begun on the Van Ness BRT project.

Comment GC-5: Limiting Construction Impacts

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

I-Hong.⁹

“One of my major concerns with these projects has been the use of “Best Practices” with the construction work. All too often this fails, for example all the work being done with the Transit Center; Dust control, hours of construction operation, noise, control of traffic, pedestrian safety, staging of material, the list goes on. These construction issues needs to be better controlled. One of the most recent projects that had sort of a magic touch to was DPR’s - Construction of the Chinese Hospital up in Chinatown had some unique control measures in place for these kind of issues and in my opinion was very successful here. It even made the SF Business Times. A point of contact phone number to call on these issues would be very beneficial, including communicating (a current www site to visit with updates, etc.) for the local business and residents to access and as to what is happening with info such as street closures, after hour work, pile driving and etc. I think this would go a long way.” (Dennis Hong; e-mail, January 3, 2017)

Response GC-5

The comment expresses concern as to whether construction-period “best practices” with respect to dust control, hours of operation, noise, traffic control, pedestrian safety, materials staging, and other factors are sufficient to avoid adverse impacts to nearby residents and workers. The comment makes favorable reference to construction practices with respect to Chinese Hospital.

The City of San Francisco ensures that construction practices result in the minimum feasible disruption through enforcement of numerous regulations, including the Construction Dust Control Ordinance, the Noise Ordinance, and the Municipal Transportation Agency’s *Regulations for Working in San Francisco Streets* (the “Blue Book”). In addition, the Draft EIR contains construction-related mitigation measures, such as Mitigation Measure M-C-TR-8, Construction Coordination, Mitigation Measure M-AQ-3a, Construction Air Quality, Mitigation Measure M-NO-2, Construction-Related Noise Reduction, and Mitigation Measure M-HZ-2, Hazardous Building Materials Abatement. Nevertheless, in light of the fact that several large projects in the vicinity of the project site may be under construction simultaneously, the Draft EIR finds:

Implementation of Mitigation Measure M-C-TR-8 would minimize, but would not eliminate, the significant cumulative impacts related to conflicts between construction activities and pedestrians, transit, bicyclists, and autos. Other measures, such as imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity, were considered but deemed infeasible due to potentially lengthy delays in project implementation. Therefore, construction of the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, could contribute considerably to cumulative construction-related transportation impacts, which would remain significant and unavoidable with mitigation.

With respect to the Chinese Hospital project, that project entailed demolition of a closed hospital building and construction of a replacement hospital building adjacent to a working hospital building and within a densely populated neighborhood with many old masonry buildings and surrounded by narrow streets.

Comment GC-6: Triangle at 12th Street and South Van Ness Avenue

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

I-Hong.11

“Are there any thoughts with the small triangle shaped lot at 12th and South Van Ness that butts up against #10 South Van Ness? Every time I pass by it, it seems to gather Homeless, pigeons and debris. Maybe the 10 South Van Ness project can do something with it.” (Dennis Hong; e-mail, January 3, 2017)

Response GC-6

The comment apparent refers to a currently unbuilt-upon lot adjacent to the south façade of the San Francisco Honda building, on the west side of South Van Ness Avenue at 12th Street (Assessor’s Parcel 003A on Block 3506). Under current conditions, a “hook” ramp from southbound South Van Ness Avenue to northbound 12th Street curves around this lot. To the south of this ramp is a landscaped triangular pedestrian island within the street right-of-way that separates 12th Street from South Van Ness Avenue. The lot in question is across South Van Ness Avenue from the proposed 1500 Mission Street project site; as a result, the proposed 1500 Mission Street project would have no effect on this lot.

For information, it is noted that Parcel 003A is a separate lot only for Assessor’s property classification and property tax assessment; however, it is not a separate legal parcel, but is part of the same legal parcel on which the 10 South Van Ness Avenue property is located. The proposed 10 South Van Ness Avenue project would be built almost to the property line on its south end, meaning that all but approximately the southernmost 6 feet of Lot 003A would be developed. The remaining, unbuilt portion of the parcel would become part of a widened sidewalk.[†] The information provided herein regarding the 10 South Van Ness Avenue project is subject to pending approvals.

Additionally, as part of the planning process for The Hub project for the area surrounding the intersection of Market Street and Van Ness/South Van Ness Avenues, the Planning Department and Municipal Transportation Agency are considering closing the portion of 12th Street south of the current hook ramp and bending 12th Street to meet South Van Ness Avenue at a T intersection just south of Parcel 003A. This would allow the existing pedestrian island to be connected to a widened sidewalk on the west side of 12th Street, creating additional landscaped open space.[§] As with the 10 South Van Ness Avenue project, this information is subject to pending approvals.

[†] Crescent Heights (developer of proposed 10 South Van Ness Avenue project), response to the Notice of Planning Department Requirements; October 14, 2016.

[§] San Francisco Planning Department, Public Realm Presentation Boards Regarding Streets and Intersections—12th Street, The Hub Workshop No. 2, June 22, 2016. Available at http://default.sfplanning.org/plans-and-programs/in-your-neighborhood/hub/Hub_Workshop2_Boards_Public_Realm_Proposal_Street+Intersection.pdf.

D. Draft EIR Revisions

The following changes to the text of the Draft EIR are made in response to comments on the Draft EIR or are included to clarify the Draft EIR text. The revisions reflect changes identified in Section C, *Comments and Responses*, or staff-initiated text changes; all of which clarify, expand or update information and/or graphics presented in the Draft EIR. Staff-initiated changes to clarify information presented in the Draft EIR are highlighted with an asterisk (*) in the margin to distinguish them from text changes in response to comments. For each change, new language is double underlined, while deleted text is shown in ~~striketrough~~. The changes are organized in the order of the Draft EIR table of contents.

These revisions do not result in any changes in the analysis or conclusions prepared pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines Section 15162(a)(3). Therefore, recirculation of the Draft EIR is not required.

D.1 Revisions in Response to Comments

Chapter II, Project Description

* On page II-23, the third full sentence in the first partial paragraph of the Draft EIR is revised as follows to clarify the description of the proposed project’s wind canopy (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

In addition, an approximately 20-foot-wide wind reduction canopy would be located along the South Van Ness façade, and an approximately 14-foot-nine-inch-wide canopy would be located on a portion of the Mission Street façade, both of which would be between approximately 23 and 28 feet above the sidewalk level of the residential tower ~~and retail/restaurant component~~.

On page II-36, the first bullet under “Board of Supervisors” is revised as follows to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

- Zoning Map amendments to change the site’s height and bulk district designations and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan.

On page II-36, the first bullet under “Planning Commission” is revised as follows to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

- Zoning Map Amendment to alter the parcels’ height and bulk and to add the newly created Mission and South Van Ness Special Use District, and General Plan amendments to amend to Map 3 (height districts) of the Market & Octavia Area Plan and Map 5 (height and bulk districts) of the Downtown Plan (recommendation to the Board of Supervisors)

Chapter III, Plans and Policies

On page III-12, the following text is added to the end of the second full paragraph to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

Approval of the proposed project would entail amendment of Map 5 (height and bulk districts) of the Downtown Plan to accommodate the proposed building heights.

On page III-13, the following text is added to the end of the second paragraph under the heading “Market & Octavia Area Plan” to clarify some of the approval actions required for the proposed project (new text is shown in double underline):

Approval of the proposed project would entail amendment of Map 3 (height districts) of the Market & Octavia Area Plan to accommodate the proposed building heights.

Chapter IV, Environmental Setting, Impacts, and Mitigation Measures

The note within Table IV.B-1 on Draft EIR page IV.B-4 is revised as follows to clarify the location of Traffic Analysis Zone 591 (new text shown in double-underline):

NOTE:

- a. The Traffic Analysis Zone (TAZ) in which the project site is located. TAZ 591 is bounded by Market, 11th, and Howard Streets, and South Van Ness Avenue.

* On page IV.B-74, the first sentence under the heading “Parking Supply vs. Demand” is revised as follows to clarify that the parking total of 414 given in the parking demand analysis excludes 6 proposed car-share spaces (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

Midday Conditions. For weekday midday conditions, the overall parking demand of 1,112 spaces would not be accommodated within the total parking supply of 414 vehicle parking spaces (i.e., 294 parking spaces within the residential and retail/restaurant component, excluding 6 car-share spaces, and up to 120 parking spaces parking spaces, within the office and permit center component, including ADA-accessible parking spaces), which would result in a shortfall of 698 spaces.

* On page IV.B-75, the following text is added after the last paragraph to supplement the discussion of parking supply and demand in the project vicinity (new text is shown in double underline):

If the proposed project did not provide any on-site parking spaces, the proposed project would have an unmet parking demand of 1,112 parking spaces during the midday period, and 646 parking spaces overnight. As indicated on Table IV.B-6, Off-Street Public Parking Supply and Utilization, there is a number of off-street public parking facilities in the project vicinity, with some availability during the weekday midday period; however, the unmet parking demand of 1,112 parking spaces during the midday period would not be accommodated within the available supply. During the overnight period, the unmet parking demand of 646 parking spaces could be accommodated within existing on- and off-street parking spaces. As a result, off-street and on-street parking occupancy in the study area would increase. It is not anticipated that this would result in a substantial parking deficit, as some drivers may park outside of the study area or switch to transit, carpool, bicycle or other forms of travel. Therefore, any unmet parking demand associated with the proposed project would not

materially affect the overall parking conditions in the project vicinity such that hazardous conditions or significant delays would be created for traffic, transit, bicycles or pedestrians.

* On page IV.E-41, the following text is added after the reference to Figure IV.E-14 through Figure IV.E-29 to provide additional information that became available after the publication of the Draft EIR (new text is shown in double underline):

After its creation, the future park at 11th Street between Minna and Natoma streets would have an area of about 19,570 sf. The park would receive about 72,829,287 square-foot-hours of Theoretical Annual Available Sunlight. On an annual basis, the proposed project would cast about 1,745,651 square-foot-hours (2.4 percent of the Theoretical Annual Available Sunlight) of net new shadow on the park. The net new project shadow would occur from early March until mid-October during the late afternoon/early evening (after 4:30 p.m.).^{209a}

On an annual basis, the proposed project would combine with other cumulative development projects to cast about 3,986,443 square-foot-hours (5.47 percent of the Theoretical Annual Available Sunlight) of net new shadow on the park. The net new cumulative shadow would occur throughout the year beginning at one hour after sunrise. Depending on the time of year, the morning shadow would move off the park by 12:00 p.m. during the summer, by 11:00 a.m. during the fall/spring, and by 8:30 a.m. during the winter.^{209b} The proposed project would contribute to the cumulative shadow on the park. As discussed above, the proposed project would cast net new shadow on the park from early March until mid-October during the late afternoon/early evening (after 4:30 p.m.).

D.2 Appendix A, Initial Study

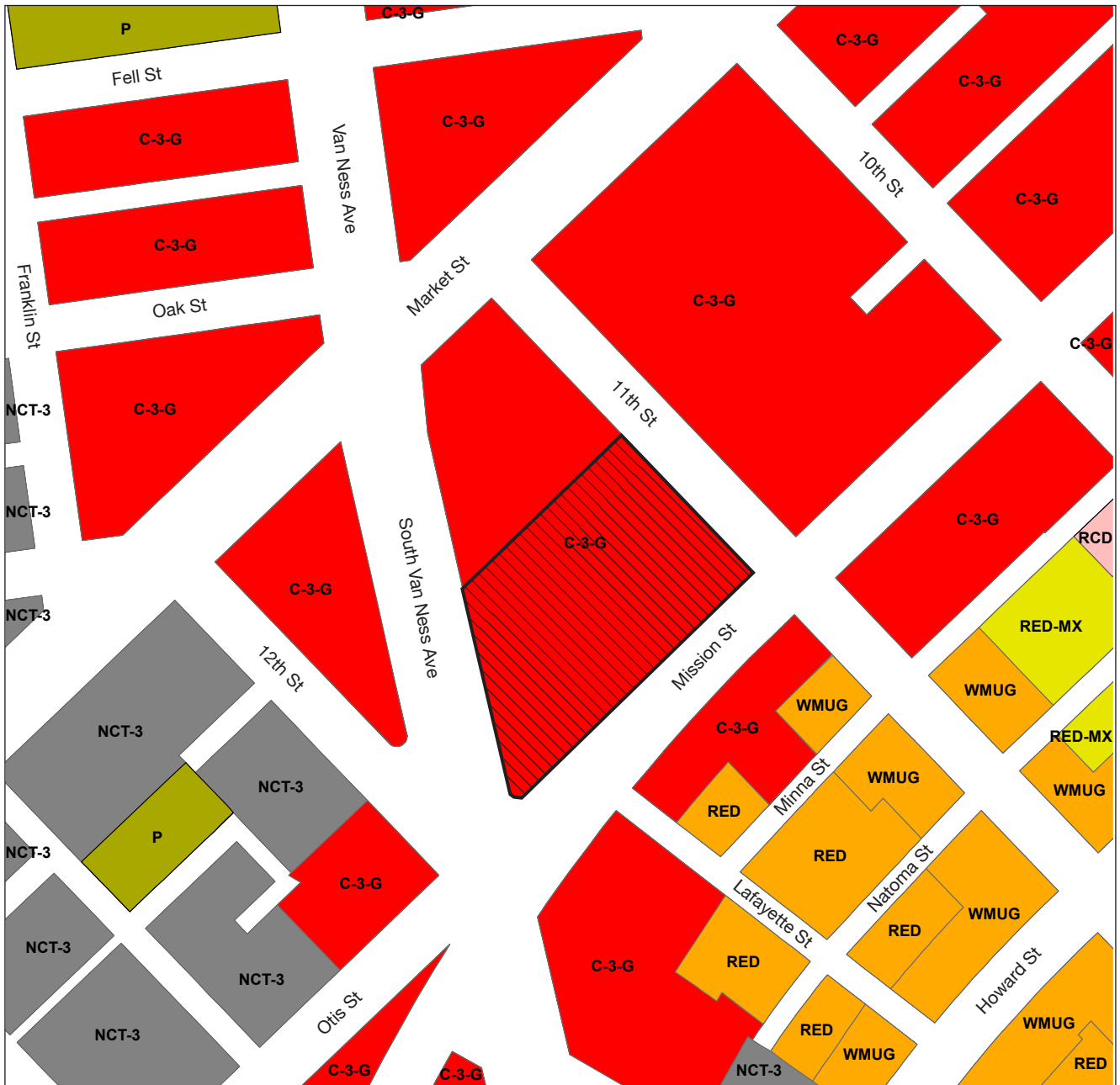
* In Appendix A, Initial Study, the header on pages ii, iii, and iv is revised to correct an editorial error by deletion of the phrase, "Preliminary Initial Study 2 – Subject to Change."

D.3 Figures

Revised EIR figures follow this page.

^{209a} PreVision Design, Shadow Analysis Report for the Proposed 1500 Mission Street Project per San Francisco Planning Code Section 295 Standards, Final R1, February 17, 2017.

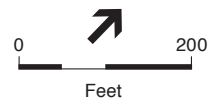
^{209b} Ibid.



Project Site

USE DISTRICTS

C-3-G	Downtown General Commercial
NCT-3	Moderate-Scale Neighborhood Commercial Transit
P	Public Use District
RCD	Regional Commercial District
RED	Residential Enclave District
RED-MX	Residential Enclave District – Mixed
WMUG	Western SoMa Mixed Use – General



SOURCE: San Francisco Planning Department

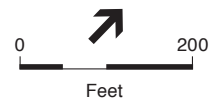
1500 Mission Street; Case No. 2014-000362ENV

● **Figure III-1 (Revised)**
Existing Zoning Map



 Project Site

Number indicates permitted height; letter or alphanumeric indicator (e.g., R-2) indicates bulk district. Where two heights are given (e.g., 85/250-R-2), the first number indicates the permitted base height and the second number indicates the maximum height. Bulk limitations apply above the base height to limit the massing of towers.



SOURCE: San Francisco Planning Department

1500 Mission Street; Case No. 2014-000362ENV
● Figure III-2 (Revised)
 Existing Height and Bulk District Map

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ATTACHMENTS

Attachments	Draft EIR Comments Introduction
Attachment A	Draft EIR Comment Letters
Attachment B	Draft EIR Hearing Transcript

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ATTACHMENTS DRAFT EIR COMMENTS

INTRODUCTION

Attachments A and B present all comments received on the Draft EIR. Attachment A contains copies of all written comments received on the Draft EIR, including comments submitted either by letter, fax, or email. Attachment B presents the public hearing transcript. Written and public hearing comments are grouped under one of three categories: governmental agencies, non-governmental organization, and individuals.

This RTC document codes the comments in the following way:

- Comments from agencies are designated by “A-” and the agency’s name or acronym thereof.
- Comments from organizations are designated by “O-” and the organization’s name or acronym thereof. In cases where several commenters from the same organization provided comments, the acronym is followed by the commenter’s last name.
- Comments from individuals are designated by “I-” and the commenter’s last name.

Each commenter is given an identifier, and each comment is numbered. Therefore, the second comment received from a representative of an organization known as “Friends of Friends” would be given designated “O-FOF.2,” while the third comment received from an individual named Smith would be designated “I-Smith.3.” In this way, the reader can both locate a particular comment in a comment letter by referring to the comment designation.

The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR, with general comments on the EIR, including comments on the merits of the proposed project and project alternatives, grouped together at the end of the section. Comments unrelated to a specific impact category are also classified as general comments. Comments on the Summary or specific mitigation measures are included under the comments regarding the relevant topical section of the Draft EIR. The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets):

Project Description [PD]
Plans and Policies [PP]
Cultural Resources [CR]
Transportation and Circulation [TR]
Wind [WI]
Shadow [SH]
Alternatives [AL]

Initial Study Topics
Land Use [LU]
Population and Housing [PH]

Other CEQA Considerations [OC]
Aesthetics
Parking

General Comments (GC)

Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, Project Description comments [PD] are listed as PD-1, PD-2, PD-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter’s name and

the comment code described in Section B of this RTC document. The reader is referred to Attachments A and B for the full text and context of each comment letter or e-mail, as well as the public hearing transcript. In those attachments, the comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

ATTACHMENT A DRAFT EIR COMMENT LETTERS

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Patricia Maurice, Dist. Branch Chief, Local Development-Intergovernmental Rev., California Dep't. of Transportation (Caltrans)	Letter, December 8, 2016	1	TR-9: Lead Agency Responsible for Mitigation
			2	TR-8: Vehicle Trip Reduction
			3	TR-6: Construction Impacts
			4	PD-3: Project Approvals Required from Caltrans
A-HPC	Andrew Wolfram, President, San Francisco Historic Preservation Commission	Letter, December 14, 2016	1	CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
			2	AL-1: The Draft EIR Analyzed an Appropriate Range of Alternatives
			3	AL-4: Concurrence with EIR Analysis of Full Preservation Alternative
			4	GC-2: Support for Approval of the Full Preservation Alternative
			5	GC-1: Project Merits
Organizations				
O-Heritage	Mike Buhler, President and CEO, San Francisco Architectural Heritage	Letter, January 4, 2017	1	GC-1: Project Merits
			2	GC-2: Support for Approval of the Full Preservation Alternative
			3	CR-1: Historical Significance of the Former Coca-Cola Bottling Plant Building
			4	CR-2: Proposed Project Would Result in Significant Adverse Impacts on Historical Resources
			5	GC-1: Project Merits
			6	GC-2: Support for Approval of the Full Preservation Alternative
			7	AL-4: Concurrence with EIR Analysis of Full Preservation Alternative
			8	GC-2: Support for Approval of the Full Preservation Alternative

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Individuals				
I-Hestor	Sue C. Hestor, Attorney at Law	Letter (1 of 2), January 4, 2017 (Part 1)	1	OC-2: Coordination of Responses to Comments for two Draft EIRs
		Letter (2 of 2), January 4, 2017 (Part 2)	1	OC-2: Coordination of Responses to Comments for two Draft EIRs
			2	PP-1: Planning Context for Proposed Project
			3	TR-1: Transportation Setting
			4	AL-2: The EIR Should Analyze an Alternative With Less Parking
			5	AL-3: The EIR Should Analyze an Alternative With More Affordable Housing
			6	LU-1: Effects on Neighborhood Character
			7	TR-2: Vehicle Miles Traveled (VMT) Impacts
			8	GC-3: Timing of Release of Draft EIR, and other Draft EIRs
			9	TR-5: Bicycle Impacts
			9	WI-1: Wind and Bicycle Safety
			10	WI-2: Request for Detail Regarding Wind Screens
			11	TR-7: Cumulative Construction Impacts
			12	PP-2: Consideration of General Plan Policies Concerning Views
			13	PD-2: Project Approvals-General Plan Amendments
			14	PP-3: <i>General Plan</i> Amendments as Part of Project
			15	PP-4: Height Limits
			16	PP-5: Parking Requirements
			17	PP-6: Housing Element Consistency
			18	PP-7: Area Plan Consistency
			19	PP-8: The Hub Plan
			20	GC-1: Project Merits
			21	PP-9: Climate Action Plan Consistency
			22	TR-5: Bicycle Impacts

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			23	GC-4: Cumulative Projects List and Map
			24	PP-1: Planning Context for Proposed Project
			25	TR-7: Cumulative Construction Impacts
			26	TR-1: Transportation Setting
			27	TR-2: Vehicle Miles Traveled (VMT) Impacts
			28	PP-10: Proposed Central SoMa Plan
			29	WI-1: Wind and Bicycle Safety
			30	WI-3: Ongoing Wind Analysis in the Project Vicinity
			31	SH-1: Shadow Effects on Parks
			32	PP-2: Consideration of <i>General Plan</i> Policies Concerning Views
			33	GC-1: Project Merits
			34	PP-7: Area Plan Consistency
			35	PH-1: Housing Displacement
			36	PH-2: Housing for Project Employees
I-Hong	Dennis Hong	E-Mail, January 3, 2017	1	GC-1: Project Merits
			2	OC-1: Request for an Aerial View of the Proposed Project
			3	TR-3: Transit Impacts
			4	TR-4: Pedestrian Impacts
			5	GC-4: Cumulative Projects List and Map
			6	PD-1: Housing and Occupancy in the Proposed Residential Tower
			7	GC-1: Project Merits
			8	PP-11: Zoning Map
			9	GC-5: Limiting Construction Impacts
			10	GC-1: Project Merits
			11	GC-6: Triangle at 12th Street and South Van Ness Avenue

TABLE A-1 COMMENT LETTERS AND E-MAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
I-Rhine	Robert Rhine	E-Mail, December 6, 2016	1	LU-1: Effects on Neighborhood Character
			2	TR-10: Parking Demand in Nearby Neighborhoods

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Serious Drought.
Help save water!*

December 8, 2016

SCH # 2015052040
GTS # 04-SF-2016-00055
SF101201
SF-101-PM T4.71

Ms. Chelsea Fordham
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

1500 Mission Street – Draft Environmental Impact Report

Dear Ms. Fordham:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 1500 Mission Street project. Thank you also for coordinating a meeting with Caltrans in anticipation of necessary permits and relinquishment agreements. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), the Caltrans Strategic Management Plan includes targets to reduce Vehicle Miles Travelled (VMT), in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Draft Environmental Impact Report (EIR).

Project Understanding

The proposed project would demolish an existing 29,000 square foot building at 1580 Mission Street and retain and rehabilitate a portion of an existing 57,000 square foot building at 1500 Mission Street and demolish the remaining portions on the project site, and construct a mixed-use development with two components: an approximately 767,200 square foot residential and retail/restaurant building at the corner of South Van Ness Avenue and Mission Street; and an approximately 567,300 square foot office building for the City and County of San Francisco on 11th Street between Market Street and Mission Street.

The project site is located in the proposed Mission and South Van Ness Special Use District in the South of Market neighborhood of San Francisco. The project site is adjacent to South Van Ness Avenue, otherwise known as US 101, part of the State Transportation Network. Several proposed project features, temporary and permanent, are in the State right of way (ROW).

The project area includes a full range of horizontally- and vertically-mixed land uses and is well-served by high-capacity transit. The existing average daily VMT per capita for the project's Transportation Analysis Zone is substantially below the existing regional average daily VMT for all proposed uses: residential, office, and retail.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Chelsea Fordham, City and County of San Francisco
 December 8, 2016
 Page 2

Lead Agency

As the Lead Agency, San Francisco (the City) is responsible for all project mitigation, including any needed improvements to State highways, if necessary. The project's fair share contribution, financing, scheduling, implementation responsibilities, and Lead Agency monitoring should be fully discussed for all proposed mitigation measures.

TR-9
A-Caltrans.1

Vehicle Trip Reduction

Caltrans commends the City for including a Transportation Demand Management (TDM) plan to reduce vehicle trips associated with the project. Given the size of the project and its potential to generate trips to and from the project area, such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. In addition to the measures recommended in the Draft EIR, with consideration of the City's unique commuting patterns, please also consider recommending inclusion of an on-site telecommute or telework center to give residents the option of working remotely.

TR-8
A-Caltrans.2

Transportation Management Plan

A Transportation Management Plan (TMP) or construction Traffic Impact Study may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with the *California Manual on Uniform Traffic Control Devices*. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510-286-4579 and see the following website: <http://www.dot.ca.gov/trafficops/camuted/camuted2014rev1.html>

TR-6
A-Caltrans.3

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a Transportation Permit that is issued by Caltrans. To apply, a completed Transportation Permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to:

Caltrans Transportation Permits Office
 1823 14th Street
 Sacramento, CA 95811-7119

See the following website for more information about Transportation Permits:
<http://www.dot.ca.gov/trafficops/permits/index.html>

PD-3
A-Caltrans.4

Encroachment Permit

A Caltrans Encroachment Permit will be required for all temporary and permanent features and activities within State ROW. The proposed work within State ROW shall be designed to State standards and in accordance with the Encroachment and Utility Policy, as provided in Chapter 17 of the *Project Development Procedures Manual*. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed Encroachment Permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

Ms. Chelsea Fordham, City and County of San Francisco
December 8, 2016
Page 3

David Salladay, District Office Chief
Office of Permits, MS 5E
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

See the following website for more information: <http://www.dot.ca.gov/trafficops/ep/index.html>

Design Exceptions. The following project features do not meet State standards, and will not be permitted unless an exception is granted. Approval of these features should not be assumed, and appropriate alternatives should be planned in the case they are not approved:

- A wind canopy which encroaches five (5) feet into State ROW.
- Twenty-five (25) trees within the sidewalk along South Van Ness Avenue.
- Six (6) parklets comprised of seating areas and a windscreen ("green wall") within the sidewalk.
- Rows of tieback anchors for shoring the basement excavation which would be detensioned, but remain within State ROW after completion of construction.
- Use of a tower crane extending over State ROW during construction.
- Sidewalk used for construction staging and pedestrian walkways constructed in the curb lane.

Relinquishment. The City recently requested that Caltrans relinquish sidewalks along Van Ness Avenue. Though the request has been filed, relinquishment is not complete until the related California Transportation Commission resolution is recorded. If the sidewalk that fronts the proposed development is relinquished to the City prior to the need for a permit, then those features affecting only the sidewalk will be within the City's jurisdiction.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jesse Schofield at 510-286-5562 or jesse.schofield@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

PD-3
cont.
A-Caltrans.4
(cont'd.)



SAN FRANCISCO PLANNING DEPARTMENT

Letter
A-HPC

December 14, 2016

Ms. Lisa Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Dear Ms. Gibson,

On December 7, 2016, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed 1500-1580 Mission Street Project (2014-00362ENV). After discussion, the HPC arrived at the comments below:

- The HPC concurs with the findings that the proposed project does not meet the Secretary of the Interior's Standards and will result in a significant, unavoidable impact to the identified historic resource, 1500 Mission Street.
- The HPC agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives.
- The HPC concurs that the Full Preservation Alternative meets the Secretary of Interior's Standards.
- The HPC agreed that they recommend adoption of the Full Preservation Alternative as it avoids significant impacts to the historic resource by retaining the majority of character-defining features and allows the building to continue to convey its significance while also allowing for adaptive use and new construction to accommodate many of the project objectives.
- The HPC generally agreed with San Francisco Heritage's statement about the symbolic importance of this project and its potential to compromise the credibility of the City's preservation program with a façade retention project as the future headquarters of several City Departments, including Planning. The HPC President noted, further, that he hopes that the Planning Commission will be very thoughtful in their deliberations about the project and consider what the project says about the City's interest in preserving historic resources.

**CR-1
A-HPC.1**

**AL-1
A-HPC.2**

**AL-4
A-HPC.3**

**GC-2
A-HPC.4**

**GC-1
A-HPC.5**

The HPC appreciates the opportunity to participate in review of this environmental document.

Sincerely,

Andrew Wolfram, President
Historic Preservation Commission

January 4, 2017

Submitted by email

Lisa M. Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA
lisa.gibson@sfgov.org

RE: 1500-1580 Mission Street

Dear Ms. Gibson,

On behalf of San Francisco Heritage (Heritage), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed project at 1500-1580 Mission Street, the site of the old Coca-Cola Bottling Works (now Goodwill). On December 1, 2016, representatives of the City and County of San Francisco, SOM, and Related California met with Heritage’s Projects & Policy Committee to present changes to the project since the Notice of Preparation (NOP) was issued in 2015; this meeting followed an initial presentation by the project team to Heritage in early 2015.

We appreciate the project team’s good faith efforts to address Heritage’s comments on the NOP and to develop feasible preservation alternatives for the DEIR. Despite notable design improvements, including greater retention of the Mission and 11th Street façades, the project as currently proposed would still demolish approximately 90% of the historic Coca-Cola Building.¹ As the future home of the Planning Department and related city agencies, Heritage believes that the project has heightened symbolic importance: We are concerned that the current design would encourage “façadism” as a preferred preservation treatment for historic resources citywide, when this practice undermines preservation values and can result in a false sense of place. Accordingly, **Heritage joins the Historic Preservation Commission in urging the Planning Department to adopt the Full Preservation Alternative as the environmentally superior (and ostensibly feasible) project alternative.**²

GC-1
O-Heritage.1

GC-2
O-Heritage.2

¹ The project as currently proposed would demolish the western end of the Mission Street façade as well as a portion of the 11th Street façade.

² At its regular meeting on December 7, 2016, the Historic Preservation Commission unanimously voted to endorse the Full Preservation Alternative.

I. Historical Significance of the Old Coca-Cola Bottling Plant

Built in 1925, 1500 Mission is a one-story reinforced concrete industrial building originally designed in the Classical Revival style; the building was enlarged and altered in 1941 in the Streamline Moderne style. In 2010, architectural historian William Kostura ranked the building among the eleven best Moderne-style buildings in San Francisco: “The building as it was added to and remodeled in 1941 remains essentially unchanged since that date. For that period (1941) this building retains integrity of location, design, materials, workmanship, setting, feeling, and association.”³ The 1500 Mission Street Historical Resource Evaluation, prepared by Architectural Resources Group, concurs that the old Coca-Cola Building is individually eligible for listing in the California Register of Historical Resources under Criterion 3 (architecture), a finding later confirmed by the Planning Department and in the DEIR.

The DEIR includes a comprehensive list of character-defining features that contribute to the building’s historic eligibility, including but not limited to the full length of the facades along Mission and 11th Streets, clock tower, stucco surface, belt courses along the base, etched speed lines along the top, the steel-and-glass doors and transom, and the building’s large, open interior with skylights supported by steel trusses.⁴

CR-1
O-Heritage.3

II. The Proposed Project would result in significant adverse impacts on historic resources

The proposed project would demolish one non-historic building and incorporate a small portion of the Coca-Cola Building into a mixed-use development that includes a high-rise residential tower and offices for the San Francisco Departments of Building Inspection, Planning, and Public Works. Most of the historic façade along Mission Street would be retained to a depth of forty feet, including its clock tower, and converted to retail use. A significant portion of the 11th Street elevation would also be preserved.

Amid San Francisco’s ongoing development boom, façade retention has increasingly been approved by the city as mitigation for projects that would otherwise fully demolish eligible historic resources (e.g., 1634-1690 Pine Street Project/The Rockwell). Although such projects often present nuanced and complex preservation issues, the practice of “facadism” is largely condemned by the national and international preservation community:

Stripped of everything but its façade, a building loses its integrity and significance, rendering it an architectural ornament with no relation to its history, function, use, construction method, or cultural heritage. With only its primary facades saved, the original structure is gone, including the roof, interior features and volume of space. [A] new structure is added on, which may be set back and

CR-2
O-Heritage.4

³ Kostura, William. DPR Form for 1500 Mission Street.

⁴ DEIR, at p.IV.A-13.

sometimes cantilevered over what was the roof level of the mostly demolished older building. When its defining features are mostly removed and no longer part of an integrated whole, a building no longer demonstrates its authentic self.⁵

Façade retention is considered demolition of a historical resource under CEQA and is generally inconsistent with the *Secretary of the Interior’s Standards*. As such, Heritage agrees with the DEIR’s conclusion that the proposed project, although improved from the original design, would nonetheless result in significant and unavoidable adverse impacts to historic resources.

Heritage believes that the preservation treatment of the Coca-Cola Building should be held to a high standard because of the example it will set for the broader development community in San Francisco. Indeed, if façade retention is adopted as the preferred solution for the Departments of Planning, Building Inspection, and Public Works, the city’s credibility to curb this practice in projects seeking their approval will be significantly compromised. It will be difficult for the Planning Department to require retention of historic resources if the city itself does not adhere to sound preservation practice.

III. The Full Preservation Alternative substantially lessens impacts on historic resources while achieving most project objectives

A key policy under the CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”⁶ CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁷ The fact that an environmentally superior alternative fails to meet all project objectives does not necessarily render it infeasible under CEQA; reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁸ CEQA requires that a project determined to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.⁹ To this end, CEQA mandates that the lead agency deny the proposed project if less harmful alternatives would feasibly obtain *most* of the basic objectives.

Heritage’s comments on the NOP, dated March 17, 2015, requested consideration of “at least one bona fide preservation alternative in the EIR that attempts to meet most of

CR-2
cont.
O-Heritage.4
(cont.d')

GC-1
O-Heritage.5

GC-2
O-Heritage.6

AL-4
O-Heritage.7

⁵ Woo, Eugenia. “What Price Facadism? Authenticity and Integrity in Historic Preservation,” ARCADE 33.2, Fall 2015. See <http://arcadenw.org/article/what-price-facadism>.

⁶ Public Resource Code, Sec. 21001 (b), (c).

⁷ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁸ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁹ Cal. Public Resources Code § 21002, 21081.

the project objectives while retaining the Old Coca-Cola Bottling Plant’s eligibility as a historical resource... including an increased setback behind the historic clock tower, retention of the full length of the 11th Street façade, and/or adaptive reuse of a portion of the current warehouse space.”¹⁰

The Full Preservation Alternative largely meets these criteria, as it would preserve exterior features of the Coca-Cola Building and a substantial portion of the industrial warehouse section of the building, including wire-glass skylights, exposed steel truss work/structural framing, and the full-height interior space that would remain intact as part of the first floor permit center. It would also retain the Mission and 11th Street facades in their entirety, and a new office tower would be constructed at the rear northwest corner of the existing building.

Significantly, the DEIR identifies the Full Preservation Alternative as the “environmentally superior alternative” because **“it would meet most of the project sponsor and City’s basic objectives, while avoiding the cultural resource impact to the 1500 Mission Street building that would occur under the proposed project.”**¹¹ The Full Preservation Alternative would not only achieve a majority of the programmatic goals, but would also enable the city to “lead by example” by demonstrating how high-density new construction can sensitively retain and adapt historic structures.

Thank you again for the opportunity to comment on the Draft EIR for the 1500 Mission Street project. Should you have questions or concerns, please do not hesitate to contact me directly at mbuhler@sfheritage.org or 415/441-3000 x25.

Sincerely,



Mike Buhler
President & CEO

cc: Steve Vettel, Esq., Farella Braun + Martel LLP
Chelsea Fordham, San Francisco Planning Department
Tim Frye, Historic Preservation Officer, San Francisco Planning Department

¹⁰ The DEIR includes a Partial Preservation Alternative and a Full Preservation Alternative. The Partial Preservation Alternative is preferable to the proposed project in that it reduces adverse impacts on historic resources, but not to a less than significant level.

¹¹ DEIR, at p.S-37 (emphasis added).

AL-4
cont.
O-Heritage.7
(cont'd.)

GC-2
O-Heritage.8

SUE C. HESTOR

Attorney at Law

870 Market Street, Suite 1128 San Francisco, CA 94102

office (415) 362-2778 cell (415) 846-1021

hestor@earthlink.net

Letter
I-Hestor

January 4, 2017

Chelsea Fordham
Environmental Review
1650 Mission St #400
San Francisco CA 94103

Comment on 1500 Mission St Project DEIR 2014-000362 - part One

I submit the following comment on the 1500 Mission Street DEIR.

There are 2 DEIRs out for development on blocks diagonally across Market and Van Ness/South Van Ness at virtually the same time:

Comments and Responses on TWO DEIRs should be coordinated

1500 Mission St - southern half of AB 3506 2014-000362 - City office building, dense market rate housing, on-site inclusionary housing, Planning Code and height increase, parking. **DEIR hearing 12/15/16, Comment DL 1/4/17.**

One Oak Street/1500 Market St - eastern portion of AB 836 2009.015E - Dense market rate housing, Planning Code and height increase, parking. **DEIR hearing 1/15/17, Comment DL 1/10/17.**

The issues of wind, traffic, transit, impacts on pedestrians, changes in the General Plan and Planning Code TO THE SAME Van Ness & Market Downtown Residential Special Use District - part of the Market/Octavia Area Plan - have EXTREMELY similar impacts, including cumulative impacts. Market and Van Ness. Mission and South Van Ness. DIAGONAL BLOCKS. Sites about 400' apart.

The deadline for DEIR comments are less than a week apart. There is no rational reason why public comments on the 2 DEIRs that have applications to BOTH projects should not be considered by both. This specifically includes issues related to transportation and parking, winds, comments on cumulative displacement and housing, including excessive parking in this transit-rich area with heavy traffic GOING STRAIGHT ONTO FREEWAYS. The high parking allowance for residences encouraging occupancy by middle and upper income people who drive instead of using public transit.

Environmental Review is ignoring these issues unless comments on issues relevant to both sites are considered in BOTH Comments and Responses/FEIRs.

Sue C. Hestor

cc: Michael Jacinto
Lisa Gibson
Market-Octavia Area Plan CAC
Eastern Neighbors Area Plan CAC

OC-2
I-Hestor.1

SUE C. HESTOR

Attorney at Law

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office (415) 362-2778 cell (415) 846-1021

hestor@earthlink.net

January 4, 2017

Chelsea Fordham
Environmental Review
1650 Mission St #400
San Francisco CA 94103

Comment on 1500 Mission St Project DEIR 2014-000362 - part TWO

I submit the following comments on the 1500 Mission Street DEIR to supplement previously submitted part one. That comment recognized that there are 2 DEIRs in the same area of the Market/Octavia Area Plan proposing increased heights and revisions to the General Plan. Both with excessive parking on the Market/Van Ness/Mission/South Van Ness corridor. Located on blocks diagonally across Market/Van Ness from each other. On streets with heavy traffic and congestion. Plus very well served by transit. BUT extremely near to Highway 101. And they have extreme winds.

The projects and DEIRs are 1500 Mission Street and One Oak Street/1500 Market Street.

Since sending part one of DEIR comments, I received an Advance Calendar which shows they are slated for approval within 2 weeks of each other. 1500 Mission is slated for approval March 23. One Oak/1500 Market on April 6. It is therefore more compelling that DEIR comments on issues common to both be considered whether they are submitted on 1500 Mission or One Oak/1500 Market.

OC-2
I-Hestor.1
cont'd.

Two maps must be added to 1500 Mission DEIR

Map #1

A map showing the boundaries of the **Market/Octavia Area Plan** PLUS the boundaries of the **Eastern Neighborhoods Area Plan** with its **5 sub-area Plans** (including the **Western SoMa Area Plan**). The M/O plan should show sub-area Van Ness & Market Downtown Residential Special Use District.

Superimpose on this Map the boundaries of the **proposed Central SoMa Area Plan, The Hub**, and all other Plans that have amended these Area Plans. This would include the **5M plan** at 5th & Market which amended part of the Eastern Neighborhood Area Plan. PLUS any **proposed** Map Amendments to either Market/Octavia or the Eastern Neighborhoods Plan, including those proposed in any pending PPA. This is the proposed map amendment for One Oak/1500 Market. Also there requested height reclassification on the western end of One Oak/1500 Market block - at Franklin & Oak.

This map is necessary

- To understand various discussions in the DEIR
- Show the changes/proposed changes to Market/Octavia Plan and Eastern Neighborhoods Plan
- Show how close the Mission Area Plan is to the boundary of the area analyzed in this EIR.

PP-1
I-Hestor.2

For each Plan please provide the date of the adoption of that Plan by the City (I believe 4/17/08 for M/O and 12/19/08 for EN.) Further provide the dates of the community planning effort or its EIR. Western SoMa was the most recent of the Area Plans.

Also for each of the areas and sub-areas please call out the amount of residential parking that it REQUIRED, if that parking is required at all.

PP-1
cont.
I-Hestor.2
(cont)

Map #2

A map showing the location of the FREEWAYS and the freeway ramps/access just south and west of 1500 Mission. This should include the route right in front of the Planning Department and north on South Van Ness adjacent to Project site. **DEIR II-3 states that Interstate 80 and US Highway 101 provide the primary regional access to project area.** Show it. I note the increasing amount of reverse commuting INTO San Francisco - so that the City provides HOUSING particularly for the Peninsula. There are currently 18 lanes of traffic into San Francisco from the South. The DEIR should be amended to state that those same freeways allow people to EXIT San Francisco to go to work. Reverse commute is a FACT.

Requested map is necessary to understanding why excessive residential parking at Project, in the context of a changed reverse-commute pattern from Silicon Valley, has dumped demand for fairly high end housing into the area of 1500 Mission and One Oak/1500 Market. What is called the "Google buses" started in the very recent past, long after adoption of the M/O and EN Area Plans. Those plans were aimed at accommodating the demand for San Francisco housing based mostly on San Francisco employment and residents. Now San Francisco is producing housing for Silicon Valley, which encourages employee from Mountain View, Cupertino, Menlo Park and other places on the peninsula to LIVE in San Francisco but WORK on the Peninsula. Since these are not low income employees, the demand is for rather high-end housing. AND THERE ARE FREEWAY CONNECTIONS RIGHT THERE.

TR-1
I-Hestor.3

A MAP of the freeway access and ramps would help understand travel patterns and possible impacts. And direct attention to the excessive parking provided in this "TRANSIT RICH" area. There is a freeway off ramp AT THE CORNER to the right of the Planning Department. There is an on ramp at South Van Ness and 13th. There is a Central Freeway ramp BEHIND the Planning Department.

Project Alternatives must be increased

The summary of alternatives(S-35) omits an **Alternative with drastically reduced residential parking. It must be added.** Another alternative with ZERO parking, but very expanded car share parking.

Van Ness - highway 101 - has a high volume of traffic, including trucks. With BRT lanes being added, vehicle traffic becomes more constrained. As new residential projects are approved, developers of market rate housing request more and more parking because the units sell for more money. As the City accommodates each request, the cost of land goes up. It is priced ASSUMING the maximum amount of parking. Housing prices go up. **Has the City done a study of what effect eliminating parking on this transit corridor would have on housing prices? How much are prices increased when the maximum amount of parking, versus ZERO residential parking, is provided?**

AL-2
I-Hestor.4

The summary of alternatives also omits an alternative with 25% inclusionary housing. This should also be included. The project is an SUD. A search of the Planning Code for SUDs will show that historically an SUD, which changes Planning Code requirements for a small area, has been used for 100% affordable

AL-3
I-Hestor.5

housing projects. 20% is headed in the right direction, but there should also be a 25% on-site inclusionary alternative.

Comments by residents of residential area south of Mission were ignored. **DEIR I-3** states that **comments at the public scoping meeting** are incorporated into this DEIR. Residents of the LMN neighborhood - Lafayette, Minna, Natoma directly across from the project - raised serious questions on the abrupt height changes proposed. They live in the area covered by the Western SoMa Area Plan and had participated in the recent hearings on that Plan which aimed to guarantee protection of housing for existing lower income residents. They raised the issue of driving "apps" that direct Uber, Lyft, and private drivers that to a short-cut through their narrow streets to avoid South Van Ness or 11th Street traffic. These issues do not come through in the DEIR.

On **DEIR I-4** and later in the transportation discussion an assertion is made that **VMT** - Vehicle Miles Travelled - is the appropriate measurement for transportation studies under new CEQA rules. I refer to the comments being submitted by Jason Henderson critiquing how Planning erroneously applies the VMT standard in light of the intervening work writing the Market/Octavia Plan.

I note that the **55-day public review and comment period on this DEIR (DEIR I-5)** began with DEIR release 11/9, the day after the Presidential election, Planning hearing was at **10am** 12/15, the last Planning Commission meeting before Christmas with comments due 1/4/17, one day after people return from the holidays. This is a brutal approach to holidays, especially when the One Oak/1500 Market DEIR was released hot on its heels. Not to mention release of the Central SoMa Area Plan (3rd version of the Eastern Neighborhoods Area Plan) came out in December.

Environmental Review appears to enjoy dumping massive DEIRs on the public over Thanksgiving and Christmas holidays.

Proposed Site Plan Figure II-4 shows **long curb cut along Mission Street**. I refer to and incorporate comments on issues related to bicyclist safety and winds that Henderson is submitting on One Oak DEIR. The safety and wind issues are similar and only separated by one block.

Please explain and show on visual - **Figure II-16 the proposed wind screens**. They are hard to understand/see.

Construction impacts II-28. Assume that both 1500 Mission and One Oak/1500 Market will be constructed simultaneously. Please describe. They are scheduled for approval at the same time. Other already approved buildings could also start construction. But please provide traffic, sidewalk, etc disruption is both happened at SAME or over-lapping time.

Views of Project Site from south - looking up South Van Ness. **Figure II-22.** There used to be policies in the Master Plan dealing with the importance of view perspectives to give orientation to pedestrians, to vehicles, to people trying to zero in on a location. City Hall. Views of the dome of City Hall from Van Ness to the north and from streets to the south were considered important. They were to orient people - those heading to City Hall or civic center. Have those policies been removed from the General Plan? If they have not, please provide a before and after perspective of the view towards City Hall from the south. The dome is visible coming north on South Van Ness. Will it disappear from view? How far to the south.

AL-3
cont.
I-Hestor.5
(cont.)

LU-1
I-Hestor.6

TR-2
I-Hestor.7

GC-3
I-Hestor.8

TR-5
WI-1
I-Hestor.9

WI-2
I-Hestor.10

TR-7
I-Hestor.11

PP-2
I-Hestor.12

Approvals Required DEIR II-36. There are General Plan amendments in this project, but they are not called out as such. Please add General Plan and its elements. Area Plans are part of the General Plan.

PD-2
I-Hestor.13

Height and Bulk - DEIR III-4 Map Figure III-2. There is no discussion that this Map includes the site of One Oak/1500 Market which also has a height increase on Market. That change should be noted. The Map shows the hypocrisy of ignoring the sibling projects.

PP-3
I-Hestor.14

Figure III-2 shows the vast difference in heights between the north and south sides of Mission. Please describe the intention of the heights on south side in the Western SoMa Plan. Also please label all streets.

PP-4
I-Hestor.15

Discussion of parking requirements III-7 seems to be saying that there is ZERO auto parking required for residences on this site but there is REQUIRED bicycle parking. Meaning that bicycle travel is highly encouraged. If this is correct, why isn't it stated so clearly? The amount of auto parking requires a CONDITIONAL USE. Which means that the amount of parking must be measured against the impacts on nearby residents (south of Mission) AND against the policies of the entire General Plan, including those of M/O and Eastern Neighborhoods. Why is an alternative without a CU not included?

PP-5
I-Hestor.16

Housing Element Needs III-10. What are the ABAG goals by income level ? Using the current measures what % of the need v goal is being produced adding this project and One Oak/1500 Market? As San Francisco displaces lower income EMPLOYEES - including those who will work at project site or nearby - and the housing produced is more and more market rate PLUS (which we are way over-producing), the people who are EMPLOYED who cannot afford housing in San Francisco seek housing outside of San Francisco. They create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. If the people OCCUPYING the new housing are reverse commuters from counties outside SF, they also create impacts on transit, on driving, on air quality - environmental effects that are BEYOND San Francisco. Discuss the effects of NOT housing in SF workers in SF, while housing in SF people who work in other counties. Displacement of EMPLOYEES - their travel to housing - is an environmental issue.

PP-6
I-Hestor.17

Discussion of **Downtown Plan** is coldly academic and misleading. Guiding Downtown Development evolved into the Downtown Plan with a change of Mayors and Planning Directors. Simultaneous with the years of development of the Plan in early 80s was a huge public effort at the Planning Commission to require construction of housing affordable to projected work force AND expansion of the transit system AND expansion of child care so that HOUSING, TRANSIT and CHILD CARE came on line to meet the needs of the expanded work force when offices opened. Thus fees required of new development. There was an active community pressure. The expansion area for downtown offices was the C-3-O (SD). The C-3-S and C-3-G, and Chinatown rezoning, were aimed at protecting lower income communities that surrounded the C-3-R and C-3-O. Downtown Plan policies did NOT call for massive height increases for residential or office towers at project site.

PP-7
I-Hestor.18

The Hub Project - III-13. Who is the public (as opposed to developers) clamoring for The Hub? The perception is that this is being driven by the Planning Department. It is another amendment to the M/O Area Plan and the adjacent areas of the Eastern Neighborhoods Area Plan.

PP-8
I-Hestor.19

Accountable Planning Initiative - Prop M 1986. DEIR III-14. Allowing increased parking - much more than REQUIRED for housing in an area that defines TRANSIT RICH, and which has really close access to

GC-1
I-Hestor.20

the freeway system, is opposite of discouraging commuter automobiles. Particularly when there is an existing lower income neighborhood *directly across the street*.

Climate action plan III.B.5. This size is in Geologic Hazard Zone. Along with One Oak it is Artificial Fill over Bay Mud. It used to be part of the Bay and has High Liquefaction susceptibility. Rising sea levels affect the ground water. Most of South of Market is Bay Fill. Including this site. Please acknowledge.

Refer to comments submitted on One Oak regarding the **hazards to bicyclists in the curb cut.** III-16.

Cumulative Land Use Project List - IV-9 - specify which of the projects are already approved or open. Map of Projects - Figure IV-1 - the map goes straight up to the Mission Area Plan boundaries (13th/Duboce). It shows the relevance of projects in the Mission Plan area to this site.

Explain changes underway to Van Ness Ave - including overlap with construction times of 1500 Mission and One Oak. **DEIR IV B-3**

Provide boundaries of **TAZ 591** or provide map. **IV B-4.** Depending on the boundary there may be few residents of TAZ 591, so it is hard to understand how relevant this is to goals in M/O Plan.

Use of VMT metric - IV B-17. I incorporate by reference comments on One Oak DEIR on how VMT was required to be applied.

Central SoMa Plan - IV B-60. To the public it appears that the Department is determined to spend years in public meetings, adopt an EN Area Plan for SoMa; spend years in public meetings, adopt a Western SoMa Area Plan; throw it all out to plan what the Department wants as a **3rd Plan** - increasing heights and density that were intentionally omitted from both of the prior plans. I have asked above for a MAP showing various EN Area Plan boundaries, the boundaries of any plans that altered an adopted plan, and the proposals for yet another plan.

Winds - IV.D.1 0 ignores totally the effects on bicycles. I have talked to cyclists who were knocked off their bikes or pushed into traffic by gusting winds. This needs to be discussed seriously in EIR. There are more than pedestrians that are affected. See comments on One Oak DEIR.

There was **Chronicle article 1/1/17** about creating a wine district appellation for the "Windswept Petaluma Gap." The description of the wind tunnel through that area sounds like the wind pattern coming over the Hayes Street Hill down to Market Street and swirling around that area. Every market rate housing or office building in this area should be required to contribute funds for the CITY/Planning Department to maintain its own wind files so that the wind study is continually updated to include ALL construction.

Shadows related to current usage of parks - IV E-2. Since increased housing density and construction was planned for in the M/O Plan and EN Plan, it is inappropriate to assume continuation of the current hours of operation of parks. In a presentation by planners from Rec Park staff to the ENCAC, RecPark staff stated, with regard to Gene Friend Recreation Center, that the demand for new, especially morning hours, from residents coming into the area means that hours of operation would shift to accommodate families and those who exercise outdoors in the morning. Patterns have also changed in the Mission district. Shadow impacts during early morning hours should not so easily be disregarded. This effects application of the **Proposition K Sunlight Ordinance.**

↑ GC-1
cont.
I-Hestor.20
(cont.)

PP-9
I-Hestor.21

TR-5
I-Hestor.22

GC-4
I-Hestor.23
PP-1
I-Hestor.24

TR-7
I-Hestor.25

TR-1
I-Hestor.26

TR-2
I-Hestor.27

PP-10
I-Hestor.28

WI-1
I-Hestor.29

WI-3
I-Hestor.30

SH-1
I-Hestor.31

Issues scoped out in Initial Study. Appendix A.

The Initial Study was issued at the same time and in the DEIR. Therefore comments on it must be made in these comments.

Aesthetics scoped out - page 23. See comments above about view toward City Hall dome from South Van Ness. Where the general plan has a policy of protecting certain views because they are important orientation points, I believe they are not merely "aesthetic." There is planning policy underlying them.

PP-2
I-Hestor.32

Adequacy of parking - page 23. The issue in this project is not whether there is ENOUGH parking but whether there is TOO MUCH in the residential building.

GC-1
I-Hestor.33

Land Use Planning - page 29. See above comments on Area Plans. This is in Market Octavia Area Plan. Its policies are being violated, especially as to excessive parking for the TRANSIT RICH site. There is too much residential parking, which will accommodate persons who want to reverse commute/drive to work. The freeways are RIGHT THERE. I have requested a map to inform the decision-maker. This is in a relatively flat area that encourages walking and biking by residents. There should be more comprehensive discussion of policies of Market/Octavia Plan AND of the Western SoMa Plan which covers the residential neighborhood directly across Mission Street. This includes TRAFFIC being redirected into that neighborhood by driving "apps" which point to a "short-cut." **page 30**

PP-7
I-Hestor.34

Population and Housing - page 31. See discussion above. As the price of housing goes up and reverse commuters find the location attractive because San Francisco is providing more housing than the peninsula, SF EMPLOYEES are forced out of SF to locations to a great extent in the East Bay which has cheaper housing. Escalating land values in SF displace residents both directly (removal) and indirectly (inadequate housing added).

PH-1
I-Hestor.35

Where are the people who WORK on site going to be housed? Page 32 ignores them.

PH-2
I-Hestor.36

Respectfully Submitted,

Sue C. Hestor

From: [Fordham, Chelsea](#)
To: [Witte, Matthew](#); [Eryn Brennan](#); [Karl Heisler](#)
Subject: Fwd: 1500 Mission DEIR Comments Case# 2014-000362ENV
Date: Wednesday, January 04, 2017 4:08:30 PM

See below an additional DEIR comment.

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----- Forwarded message -----

From: "**Dennis Hong**" <dennisj.gov88@yahoo.com>
Date: Tue, Jan 3, 2017 at 3:33 PM -0800
Subject: 1500 Mission DEIR Comments Case# 2014-000362ENV
To: "Secretary, Commissions (CPC)" <commissions.secretary@sfgov.org>, "Gibson, Lisa (CPC)" <lisa.gibson@sfgov.org>, "Fordham, Chelsea" <chelsea.fordham@sfgov.org>
Cc: "Board of Supervisors, (BOS)" <board.of.supervisors@sfgov.org>, "Lee, Mayor (MYR)" <mayoredwinlee@sfgov.org>, "Kim, Jane (BOS)" <jane.kim@sfgov.org>, "Rose, Paul (MTA)" <paul.rose@sfmta.com>

Good afternoon Honorable Mayor Edwin Lee, Honorable members of the San Francisco Planning Commission, Honorable members of the Board of Supervisors and Miss Lisa Gibson and Miss Chelsea Fordham,

I have been a resident of San Francisco for more than 70 Plus years and as requested I'm submitting my comments to this 1500 Mission Street Project. I have worked in this windy area; specifically at OSVN (One South Van Ness) and 1455 Market Street for more than 20 years and still visit this area. I was one of the Project Mangers for the 1455 Market Street building - formerly the B o A Data Center.

Some of my comments may be redundant on this DEIR, only because this Document overlaps with the Initial Study, the NOP, Public Scoping, the DEIR itself and other documents. So pardon any variances to the

specific subjects I refer to. First of all I fully support this project. This DEIR is very comprehensive and covers just about all the issues and has done an excellent job because it shows. Secondly excuse me for rambling on.

GC-1
I-Hong.1

Even though current CEQA does not require images renderings and etc of the project. I disagree with this CEQA issue only because all to often words, black and white elevations describing the design does not present what it will look like. I believe all to often projects fail because of this missing link. However, this DEIR does an excellent job with this process and is a positive Plus for its justification and uniqueness to this blighted area. Granted, design, color and materials are personal. But I studied and practiced both architecture and urban design and now retired. To add just one link to this presentation it would be to insert the project in to an aerial photo showing how these projects would look with the existing environment. The birds eye figure does some of this - but the photo and the proposed project to me - would be a spot on. So lets get started:

OC-1
I-Hong.2

1. **TRAFFIC and Vision 0:**

- A. 11th street - between Market Street and Mission Street has two
existing parking garage entries/exits both to 1455 Market Street.
- B. OSVN has two Entries/Exits as well.
- C. Does Muni still use this street for their train street car turn

TR-3
I-Hong.3

around(?).

D. Were these issues considered? Only because of the Projects

additional traffic along 11th street between Market Street and

Mission will have an impact this street.

E. Minor detail. Will the Muni Stop on South Van Ness at Mission

remain? This is a heavier used Muni stop. The proposed residential

tower at this stop will get a lot more use. Only because in some of

the recent drawings it is not shown, i.e., in Figure II-4 and

Figure 3-page 5. But again as I mentioned there are over laps of these documents.

F. Will the existing Commuter Shuttle bus stop in front of 10 South

Van Ness remain? Not sure if this was one of MTA HUB stop/s.

G. Keeping Vision 0 in mind, I was unable to reconcile the pedestrian

and the vehicle traffic issue, was this issue considered at both the:

- busy intersection - Mission Street, South Van Ness, Otis and 12th Street.

- busy intersection - Market Street at Van Ness/South Van Ness?

- soon to be 11th and Mission Street and 11th and Market Street.

TR-3
cont.

I-Hong.3
(cont.)

TR-4
I-Hong.4

2. The Cumulative Land Use:

The Table IV-1 page IV-9 shows there are 22 Projects/work to be done in this 0.25 mile area-Nov 2016. [- 24 Months (2 years) for this massive 1500 Mission project - page II-28. (I recall there was a much longer time time shown for this project but was unable to find it).]

a. Can project time lines be shown for each of these projects on this

Table IV-1?

b. Can the following project also be shown on this chart:

- San Francisco MTA/MUNI - BRT project.

GC-4
I-Hong.5

3. Housing and occupancy in the proposed Residential Tower

Table 1-page 9 and Table 1-page 4:

a. To be family friendly, can a few more three bedroom units be added?

b. In Table 1-page 9 it shows 560 units and Table 1-page 4 of the NOP ---- it shows 550 Units.

c. Can the Table also show how many are BMR and etc. I realize the this matrix varies.

PD-1
I-Hong.6

4. Project Architectural Design and Aesthetics:

- a. I like the step down and separation of the towers.
- b. The renderings does an excellent job with communicating what this will look like, vs black and white elevations. (Just a simple CEQA issue. I believe this issue is being currently reviewed with CEQA and may be a requirement down the road). Figures 11-17 thru 11-22 says it all.
- c. The proposed public open space is another positive to this project.

GC-1
I-Hong.7

5. Drawings/Graphics:

- a. Can additional description/s of Symbols be added to Figure 111-1 in what (i.e. - Zoning-color, RED-MX represent)?

PP-11
I-Hong.8

6. Construction work:

One of my major concerns with these projects has been the use of "Best Practices" with the construction work. All to often this fails, for example all the work being done with the Transit Center; Dust control, hours of construction operation, noise, control of traffic, pedestrian safety, staging of material, the list list goes on. These construction issues needs to be better controled. One of the most recent projects that had sort

GC-5
I-Hong.9

of a magic touch to was DPR's - Construction of the Chinese Hospital up in Chinatown had some unique control measures in place for these kind of issues and in my opinion was very successful here. It even made the SF Business Times. A point of contact phone number to call on these issues would be very beneficial, including communicating (a current www site to visit with updates, etc.) for the local business and residents to access and as to what is happening with info such as street closures, after hour work, pile driving and etc.. I think this would go a long way.

GC-5
cont.
I-Hong.9
(cont.)

7. In conclusion:

As I mentioned earlier, I fully support this project. This semi blighted area needs this project and others so it can continue to develop others in this area. Are there any thoughts with the small triangle shaped lot at 12th and South Van Ness that butts up against #10 South Van Ness? Every time I pass by it, it seems to gather Homeless, pigeons and debris. Maybe the 10 South Van Ness project can do something with it.

GC-1
I-Hong.10

GC-6
I-Hong.11

Once again, it was a pleasure and thanks again for the opportunity to review and comment on this most exciting project. I trust I have met your deadline of January 4, 2017 to submit my comments for consideration. Sorry for my disorganized presentation of comments.

Please add my comments to the RTC document and send me a hard copy of the RTC when finished. Please

contact me if you need any additional information to my comments.

Best regards, Dennis

December 6, 2016

Lisa M. Gibson, Acting Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Submission of Comments
1500 Mission Street Project Draft EIR
PLANNING DEPARTMENT
CASE NO. 2014-000362ENV

Dear Ms. Gibson,

Thank you for this opportunity to respond to the 1500 Mission Street Project Draft EIR (the Planning Commission Public Hearing on December 15, 2016). These comments are aligned to the EIR Impact findings and relate to two topics: character of the adjacent existing western SOMA residential enclave, and the cumulative impact of the Hub development to the same area.

Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity.
LTS None required. NA

The EIR states,

"The proposed 39-story, 396-foot-tall tower (416 feet to top of parapet) residential and retail/restaurant building would be taller than the buildings located to the south and west on Mission and Minna Streets, but would be similar in height to other buildings along Market, 11th, and 10th Streets to the north and east. Although the 39-story tower would be substantially taller than the low-rise residential buildings in the area to the south around Lafayette, Minna, and Natoma Streets; given the layout of the street grid, the tower would only be visible in views north from Lafayette Street. The existing buildings located along the 35-foot-wide Minna and Natoma Streets would obscure views of the tower, except where a few single-story buildings are located on the north sides of those streets. Furthermore, this low-rise residential area would continue to be surrounded by low-scale buildings to the east, west, and south; therefore, the 39-story tower would not substantially alter the character of this area. The proposed 16-story office building would be taller than buildings to the south and west, but similar in height to buildings directly north and east of the proposed project. Therefore, the proposed project would be generally consistent with the overall existing height and massing of buildings in the area. The proposed project would also establish a mixed-use building and office building in proximity to other similar mixed-use and office buildings, and would not introduce an incompatible land use to the area. The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood. Therefore, the proposed project would have a less than-significant impact upon the existing character of the vicinity and no mitigation measures are necessary."

Comment:

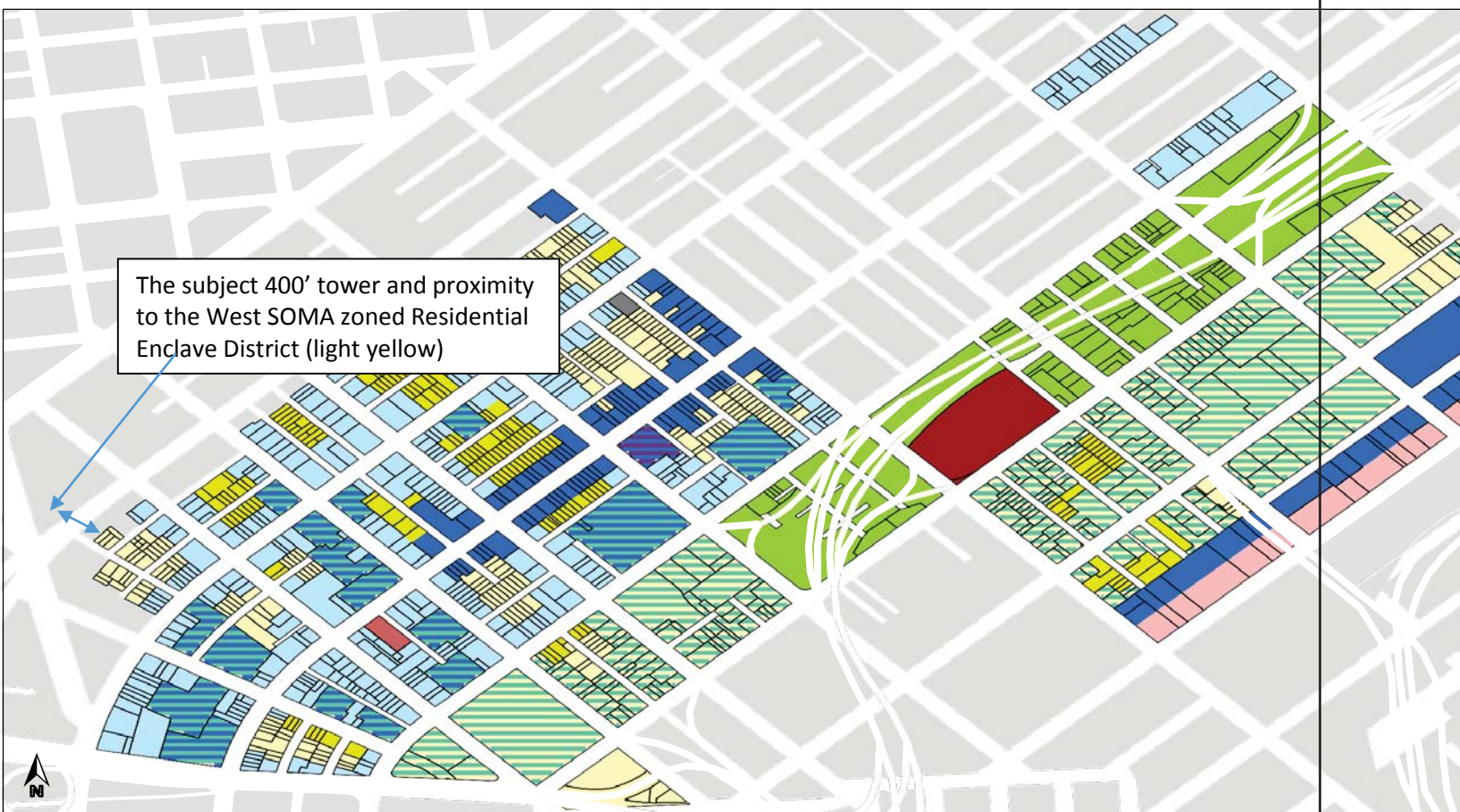
Our neighborhood is located directed south of the project site (less than 75 feet) and is part of the Western SOMA plan area, zoned Residential Enclave District (RED) with a height district 40-X. During hearings before the Planning Commission for the Market Octavia Plan, our neighborhood association, Lafayette, Minna and Natoma neighborhood association (LMN) expressed concern that the proposed plan height district at Mission and South Van Ness (then 320') would be out of scale with the height district of the Western SOMA plan (RED). Nowhere else in the city does such a sharp transition of height districts occur, and at the time of the passage of the Market Octavia Plan the San Francisco Planning Commission assured the LMN neighborhood association that consideration would be given to that issue as future projects came forward.

LU-1
I-Rhine.1

Now the proposed height will increase to over 400 feet. We understand the reasons for the proposed increase, however the EIR did not address the impact to the character of the area (Impact LU-3 above), merely stating, "The proposed project would contain land uses that are consistent and compatible with surrounding land uses, and would be in keeping with the existing character of the urban fabric of the neighborhood." The figure below shows how close the proposed project is to our residential area. Mission Street does not provide enough separation between a 400+ foot tower and 40 foot residential apartments. At a project information meeting I was told that the tower would not be located further north on the project site because of the wind impact, however no alternative location of the tower was considered. Could it have been further north and then set back on the parcel to the east?

LU-1
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I-Rhine.1
(cont.)

The subject 400' tower and proximity to the West SOMA zoned Residential Enclave District (light yellow)



Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative land use impact.
LTS None required. NA

EIR states, "...project site would add approximately 7,510 new residents within 3,237 new dwelling units. Overall, these approved and proposed projects, when combined with the proposed project, would add 8,904 new residents in the project vicinity, which would represent a residential population increase of approximately 29 percent."

EIR states, "Accordingly, parking impacts can no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. Although not required, the EIR presents a parking demand analysis for informational purposes. The EIR also considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis."

Comment:

Evidently impacts related to parking are no longer analyzed. With the exception of the LMN RED area, there is limited street parking in the project vicinity. The project as well as the future hub residential development provides limited onsite residential parking. The EIR merely assumes future tenants will not own cars because parking will not be provided. There is no assurance this will be case, and if future residents own cars without project provided parking they will be "hunting" for parking spaces in our neighborhood area, circling endlessly in that quest. The LMN RED has weekday residential parking controls, but not for weekends. Residents and businesses in the LMN RED use their cars and trucks for work seven days a week, they rely on street parking. Residential parking controls need to be extended to seven days per week and strictly enforced so residents, particularly renters, businesses and their customers, can continue to have access to street parking. Also, this area is occupied by residents who work in blue collar trades and have trucks which they use for work. These workers do not have off street parking and any increase demand for off street parking will just add to an already tenuous situation with regards to these small business trades people. With the future cumulative Hub development this represents a real impact to the residents and small businesses in the LMN RED. Finally, related to increased traffic due to people seeking parking in our neighborhood, there is no analysis of the air pollution and noise impacts within the LMN RED District boundary.

Thank you for your review and consideration.

Sincerely,

Robert Rhine

1025 Minna Street, Apt 5
San Francisco, Ca. 94103

TR-10
I-Rhine.2

cc:

San Francisco Planning Commission

Commission President Fong
Commission Vice-President Richards
Commissioner Hillis
Commissioner Johnson
Commissioner Koppel
Commissioner Melgar
Commissioner Moore
Jonas P. Ionin, Commission Secretary

Chelsea E. Fordham, Environmental Planner, San Francisco Planning Department

ATTACHMENT B DRAFT EIR HEARING TRANSCRIPT

TABLE B-1 PUBLIC HEARING COMMENTS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Moore	Kathrin Moore, San Francisco Planning Commission	Hearing Transcript, December 15, 2016	1	CR-3: Historical Photographs of 1500 Mission Street Building
			2	CR-4: Remnant Streetcar Tracks on 11th Street

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BEFORE THE
SAN FRANCISCO PLANNING COMMISSION

1500 MISSION STREET PROJECT

HEARING ON

DRAFT ENVIRONMENTAL IMPACT REPORT

AND INTENT TO INITIATE GENERAL PLAN AMENDMENTS

AND INTENT TO INITIATE

PLANNING CODE TEXT AND ZONING MAP AMENDMENTS

Thursday, December 15, 2016

San Francisco City Hall

One Dr. Carlton B. Goodlett Place

Commission Chambers, Room 400

San Francisco, California

Item No: 6
Case No.: 2014-00362ENV

Reported By: Deborah Fuqua, CSR #12948

1 APPEARANCES:

2
3 San Francisco Planning Commission:

4 President Rodney Fong

5 Commissioner Kathrin Moore

6 Commissioner Joel Koppel

7 Commissioner Christine Johnson

8 Commissioner Myrna Melgar

9 Commissioner Dennis Richards

10
11 Commission Secretary Jonas Ionin

12 Planning Staff Director John Rahaim

13 Planning Staff:

14 Chelsea Fordham

15 Tina Chang

16 Dan Sider

17
18 PUBLIC COMMENT

19 (No comments offered from the public)

20
21
22
23 ---o0o---
24
25

1 Thursday, December 15, 2016

10:25 a.m.

2 --o0o--

3 P R O C E E D I N G S

4 SECRETARY IONIN: Very good, Commissioners.
5 That will place us on our regular Calendar Item 6.

6 For Case No. 2014-000362ENV, at 1500 Mission
7 Street, this is the Draft Environmental Impact Report.

8 CHELSEA FORDHAM: Good morning, President Fong
9 and Members of the Commission. I am Chelsea Fordham,
10 Planning Department Staff.

11 The item before you is review and comment on
12 the 1500 Mission Street Draft Environmental Impact
13 Report, or EIR, pursuant to the California
14 Environmental Quality Act, or CEQA, and San Francisco's
15 local procedure for implementing CEQA. The item before
16 you is the public hearing to receive comments on the
17 Draft Environmental Impact Report or Draft EIR for the
18 1500 Mission Street project.

19 I am joined here today by my colleagues, Wade
20 Wietgreffe, Senior Environmental Planner, Tina Tam with
21 Preservation staff and members of the consult team and
22 project sponsor team are also present today.

23 The project site is located at 1500 Mission
24 Street, which is located on the north side of Mission
25 with South Van Ness Avenue to the West, 11th Street to

1 the east and within the South of Market neighborhood of
2 San Francisco.

3 This site is currently developed in two
4 buildings, including the existing retail building at
5 1580 Mission and a warehouse building at 1500 Mission.
6 The proposed project includes demolition of an existing
7 retail building at 1580 and partial demolition and
8 partial retention of the existing warehouse at 1500
9 Mission Street and construction of a mixed-use
10 development with two project components: one, an
11 approximately 400-foot-tall tower of residential and
12 retail uses at the corner of South Van Ness and Mission
13 and an approximately 250-foot tall office and permit
14 center building for the City and County of
15 San Francisco between 11th Street on -- between -- on
16 11th between Market and Mission.

17 In sum, the two components would result in a
18 total of 560 dwelling units, about 38,000 gross square
19 feet of commercial space, and 567,000 square feet of
20 office and childcare space. Also included would be
21 off-street parking for 420 vehicles, 530 bicycles, and
22 58,000 gross square feet of public and common open
23 space.

24 The Draft EIR concluded that the proposed
25 project would result in two significant and unavoidable

1 impacts including a project-specific impact to historic
2 architectural resources and a cumulative impact related
3 to transportation and circulation.

4 The Draft EIR found that other impacts to
5 archeological and tribal cultural resources, air
6 quality, transportation and circulation, noise,
7 inadvertent discovery of paleontological resources and
8 hazardous materials could be mitigated to a less than
9 significant level.

10 A hearing to receive the Historic Preservation
11 Commission's comments on the Draft EIR was held last
12 week on December 7th. I have provided you with a copy
13 of the HPC's comment letter. At the hearing the HPC
14 agreed that the DEIR analyzed an appropriate range of
15 preservation alternatives to address the historic
16 resource impact. Further, the HPC commented that they
17 appreciated that the preservation alternatives not only
18 avoided some or all of the identified significant
19 impacts but also met or partially met the project
20 objectives.

21 Further comments in regards to the project and
22 the project approvals. Today, comments should be
23 directed towards the adequacy and accuracy of the
24 information gained in the Draft EIR. Comments on the
25 merits of the project will be heard following this

1 hearing during the public comment period on the next
2 agenda item.

3 For members over the public who wish to speak
4 on the Draft EIR, please state your name for the
5 record.

6 Staff is not here to answer comments today.
7 Comments will be transcribed and responded to in
8 writing in the comments and responses document. We
9 will respond to all verbal and written comments
10 received and make revisions to the Draft EIR as
11 appropriate.

12 Those who are interested in commenting on the
13 Draft EIR in writing by mail or e-mail may submit their
14 comments to the environmental review officer at 1650
15 Mission, Suite 400, San Francisco by 5:00 p.m. on
16 January 4th, 2017.

17 After the comment period ends on January 4th,
18 the Planning Department will prepare a comments and
19 responses document which will contain our responses to
20 all relevant comments on the Draft EIR heard today and
21 sent in writing to the Planning Department.

22 We anticipate publication of the comments and
23 responses document early spring of next year followed
24 by an EIR certification hearing, also early spring of
25 2017.

1 And unless the Commissioners have questions, I
2 would respectfully suggest that the public hearing on
3 this item be opened.

4 SECRETARY IONIN: I have no speaker cards.

5 PRESIDENT FONG: Okay. Opening up to public
6 comments.

7 (No response)

8 PRESIDENT FONG: Not seeing any, public
9 comment's closed.

10 Commissioner Moore?

11 COMMISSIONER MOORE: Yes. I'd like to ask
12 that in the historic preservation discussion of the
13 1500 Mission building that you include historic photos
14 of the building that when it comes to the Final EIR
15 will make it easier for people who are interested to
16 comment to see what it was like. The building has
17 slightly been altered overtime and there would be an
18 emphasis on those elements that will be particularly
19 integrated.

20 We all have seen the first discussion on the
21 building which does a very nice job of recognizing the
22 importance of the building, but further elaboration on
23 the background, historic photos would be very helpful,
24 including where the main entrances were so we have a
25 really better appreciation of what is included.

A-CPC-
Moore-1

CR-3

1 The second thing I would like to ask, and I
2 think it falls under Historic Preservation, the issue
3 of a street car spur, which is basically the T Line --
4 no, the J, the J Line has a push-back onto 11th Street,
5 which is a very interesting phenomenon.

6 I took a picture of it one day when I was
7 walking down the street. And as I was coming up from
8 Mission, there was an old street car standing on 11th
9 Street. That was such an incredible complement for
10 celebrating the new civic office presence on
11 11th Street that I would like to see that the historic
12 spurs better explained in the EIR, together that the
13 streetcape plan for 11th Street figures out on how we
14 can have a historic marker about this phenomenon and
15 potentially even a place where tourists can stop and
16 experience the street car just as you experience the
17 turnaround on Powell, the cable car on Powell Street.

18 It's a great experience because normally you
19 see that thing that's moving up and down Market Street
20 you can really never touch or feel it. And when I saw
21 it, I was so surprised, that I thought it would be a
22 real great innovation and invitation for also certain
23 retail -- to have a little restaurant which focused on
24 the thing. I don't -- I cannot ask that there be a
25 stop where you can jump onto it, but that would be

A-CPC-
Moore-2

CR-4

1 obviously a great idea. I don't think it's quite set
2 up that way. But for it to be standing there was just
3 amazing to me.

4 So that's on there and they have basically
5 congestion, they pulled that spur that puts a car on
6 that spur. And I'd like you to explain that a little
7 bit more in the EIR.

8 Otherwise, I am comfortable with where you are
9 going. I think it's thorough and covers all those
10 things that I, from my perspective, need to know about.
11 Thank you.

12 SECRETARY IONIN: If there's nothing further
13 Commissioners, we can move on.

14 (Whereupon, the proceedings concluded
15 at 10:33 a.m.)
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STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, DEBORAH FUQUA, a Certified Shorthand Reporter of the State of California, do hereby certify that the foregoing proceedings were reported by me, a disinterested person, and thereafter transcribed under my direction into typewriting and is a true and correct transcription of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named, nor in any way interested in the outcome of the cause named in said caption.

Dated the 5th day of January, 2017.



DEBORAH FUQUA

CSR NO. 12948