



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Draft Motion

HEARING DATE: November 10, 2011

Hearing Date: November 10, 2011
Case No.: **2005.1004E**
Project Address: **Glen Park Community Plan Area**
Zoning: Various
Block/Lot: Various
Project Sponsor: San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

San Francisco Municipal Transportation Agency
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ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED GLEN PARK COMMUNITY PLAN.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as Case No. 2005.1004E, Glen Park Community Plan (hereinafter "Project"), based upon the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*) (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").
 - A. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on July 1, 2009.
 - B. On April 27, 2011, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.
 - C. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on April 27, 2011.

- D. On April 27, 2011, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the Department's files, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.
- E. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on April 27, 2011.
2. The Commission held a duly advertised public hearing on said DEIR on June 2, 2011 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on June 13, 2011.
 3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Comments and Responses document, published on October 27, 2011, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.
 4. A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Comments and Responses document, all as required by law.
 5. Project EIR files have been made available for review by the Commission and the public. These files are available for public review at the Department at 1650 Mission Street, and are part of the record before the Commission.
 6. On November 10, 2011, the Commission reviewed and considered the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.
 7. The Planning Commission hereby does find that the FEIR concerning File No. 2005.1004E reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Comments and Responses document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA and the CEQA Guidelines.
 8. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.
 9. The Commission, in certifying the completion of said FEIR, hereby does find that the project described in the EIR would have the following unavoidable significant environmental impacts that could not be mitigated to a level of non-significance:

- A. An unavoidable significant impact related to transportation and circulation due to unacceptable level of service (LOS) at the Bosworth Street/Diamond Street intersection during the AM and PM peak hours under project and cumulative conditions;
- B. An unavoidable significant impact related to air quality due to construction activities with respect to criteria air pollutant and ozone precursors under project and cumulative conditions; and
- C. An unavoidable significant impact related to air quality due to construction and operational activities that would emit toxic air contaminants (TACs) that would exceed Bay Area Air Quality Management District (BAAQMD) significance thresholds under project and cumulative conditions.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of November 10, 2011.

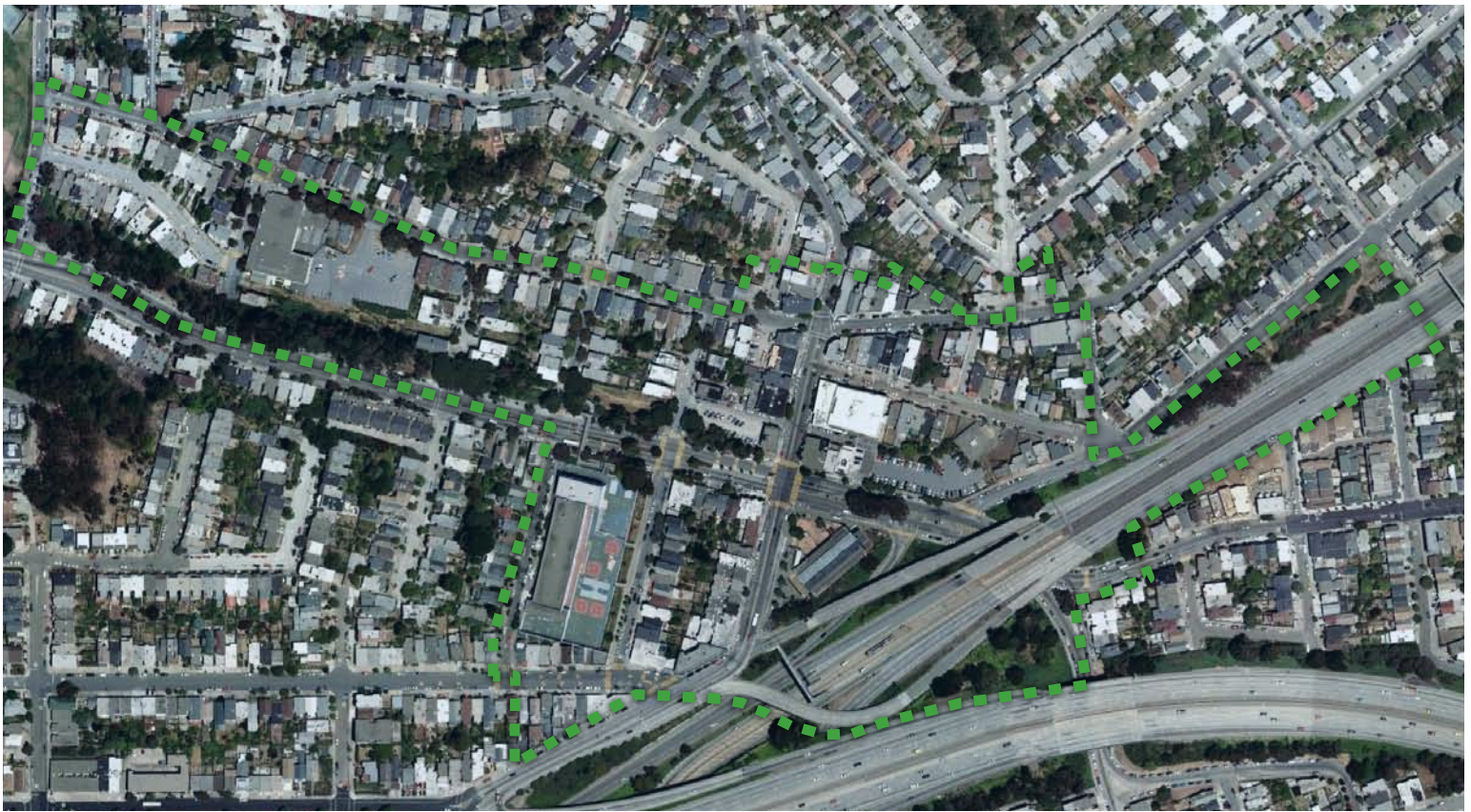
Linda Avery
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED: November 10, 2011



COMMENTS AND RESPONSES

Glen Park Community Plan

PLANNING DEPARTMENT
CASE NO. 2005.1004E

STATE CLEARINGHOUSE NO. 2009072013



SAN FRANCISCO
PLANNING
DEPARTMENT

Draft EIR Publication Date:	April 27, 2011
Draft EIR Public Hearing Date:	June 2, 2011
Draft EIR Public Comment Period:	April 27, 2011 through June 13, 2011
Final EIR Public Certification Date:	November 10, 2011



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

October 27, 2011

TO: Members of the Planning Commission and Interested Parties
FROM: Bill Wycko, Environmental Review Officer
RE: **Attached Comments and Responses on Draft Environmental Impact Report, Case No. 2005.1004E Glen Park Community Plan Project**

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Attached for your review please find a copy of the Comments and Responses document for the Draft Environmental Impact Report (EIR) for the above referenced project. This document has been provided to you either as a hard copy or on a CD. The document is also available for download on the Planning Department's website <http://tinyurl.com/sfceqadocs>. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on November 10, 2011.** Please note that the public review period ended on June 13, 2011.

The Planning Commission does not conduct a hearing to receive comments on the Comments and Responses 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 Comments and Responses document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Comments and Responses document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Comments and Responses document or the environmental review process, please contact Lisa Gibson at (415) 575-9032 or Lisa.Gibson@sfgov.org.

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

City and County of San Francisco
Planning Department

Glen Park Community Plan

COMMENTS AND RESPONSES

Planning Department Case No. 2005.1004E

State Clearinghouse No. 2009072013

Draft EIR Publication Date:	April 27, 2011
Draft EIR Public Hearing Date:	June 2, 2011
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Glen Park Community Plan

Comments and Responses

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COMMENTS AND RESPONSES

A. INTRODUCTION

PURPOSE OF THE COMMENTS AND RESPONSES DOCUMENT

This Comments and Responses document responds to comments on the Glen Park Community Plan Draft Environmental Impact Report (DEIR). This document was prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines (*CEQA Guidelines*) and presents all comments received on the DEIR, the City's responses to comments, copies of the letters received, and a transcript of the public hearing. Responses are provided to all comments regarding whether the DEIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. The DEIR, together with this Comments and Responses document, will be considered by the Planning Commission in an advertised public meeting, and then certified as a Final Environmental Impact Report (FEIR) if deemed adequate.

ENVIRONMENTAL REVIEW PROCESS

A Notice of Preparation of an Environmental Impact Report and an Initial Study for the Glen Park Community Plan was distributed on July 1, 2009. Written comments on the scope of the EIR were accepted until July 31, 2009. Comments regarding the scope of the EIR were addressed in the DEIR. The DEIR was distributed for public review and comment in accordance with CEQA on April 27, 2011. The public review period for the DEIR began on April 27, 2011 and ended June 13, 2011. During the public comment period, the document was reviewed by various State, regional, and local agencies, as well as by interested organizations and individuals. Thirteen comment letters or e-mail messages were received from four agencies, one organization, and seven individuals. A public hearing before the City's Planning Commission was held on June 2, 2011 to obtain oral comments on the DEIR. During the public hearing, oral comments were offered by two individuals and one Planning Commissioner. The FEIR will be reviewed by the Planning Commission for certification on November 10, 2011.

ORGANIZATION OF COMMENTS AND RESPONSES

This document contains the public comments received on the Glen Park Community Plan DEIR, and responses to those comments. Also included in this document are changes to the DEIR.

Following this introduction, Section B presents a list of all agencies, organizations, and individuals that provided written comments, and the date of their communications, or oral

testimony at the public hearing on the DEIR before the San Francisco Planning Commission held on June 2, 2011.

Section C presents the 2010 Glen Park Community Plan (*2010 Community Plan*) refinements made in response to community comments and suggestions following release of the DEIR. This section also describes potential environmental effects of the refinements.

Section D contains comments on the DEIR made orally during the public hearing and received in writing during the public comment period, from April 27, 2011 through June 13, 2011. The comments presented in this section consist of verbatim excerpts from the written comments and public hearing transcript; in some cases, minor typographical errors have been corrected. Comments are grouped by environmental topic and generally correspond to the table of contents of the DEIR; comments that do not address a particular topic appear under the General Comments section of this document. The name of the commenter, the format of the comment (letter, transcript, e-mail, etc.), and the date of the comment are indicated following each comment. Each comment is coded by topic, as indicated below:

- General Comments GC
- Initial Study IS
- Project Description PD
- Land Use LU
- Aesthetics AE
- Cultural and Paleontological Resources CP
- Transportation and Circulation TR
- Air Quality AQ

The comment letters received and the transcript of the public hearing are reproduced in Appendices 1 and 2, respectively, and are marked with the comment codes to indicate where each discrete comment is addressed in Section D.

Section E contains text changes to the DEIR made by the EIR preparers subsequent to publication of the DEIR to correct or clarify information presented in the DEIR, including changes to the DEIR text made in response to comments. Text additions are shown in double underline and deletions are shown in ~~strikethrough~~.

Several comments made both in writing and at the public hearing were directed towards the perceived merits or demerits of the project. Responses to these comments are brief, as they do not concern the adequacy or accuracy of the EIR.

These comments and responses will be incorporated into the FEIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the FEIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

STATE, REGIONAL, AND LOCAL AGENCIES

State of California Governor's Office of Planning and Research

Scott Morgan, Director, written comments, June 13, 2011

California Department of Transportation

Gary Arnold, District Branch Chief, written comments, June 7, 2011

San Francisco Bay Area Rapid Transit District

Jeffrey P. Ordway, Manager of Property Development, written comments, June 13, 2011

Historic Preservation Commission

Charles Edwin Chase, President, written comments, May 24, 2011

San Francisco Planning Commission

Ron Miguel, Vice President, public hearing comments, June 2, 2011

ORGANIZATIONS

The Glen Park Association

Nicolas Dewar, Chairman, written comments, June 13, 2011

INDIVIDUALS

Lesley Kinnear, written comments, May 23, 2011

Maria Hekker, written comments, May 25, 2011

Philip Siepert, written comments, June 2, 2011

Philip Siepert, written comments, June 3, 2011

Daniel O'Keefe, written comments, June 5, 2011

Diane Grant, written comments, June 7, 2011

Tania Treis, written comments, June 13, 2011

Ric Lopez, written comments, June 13, 2011

Sally Ross, public hearing comments, June 2, 2011

Nicolas Dewar, public hearing comments, June 2, 2011

C. PLAN REFINEMENTS

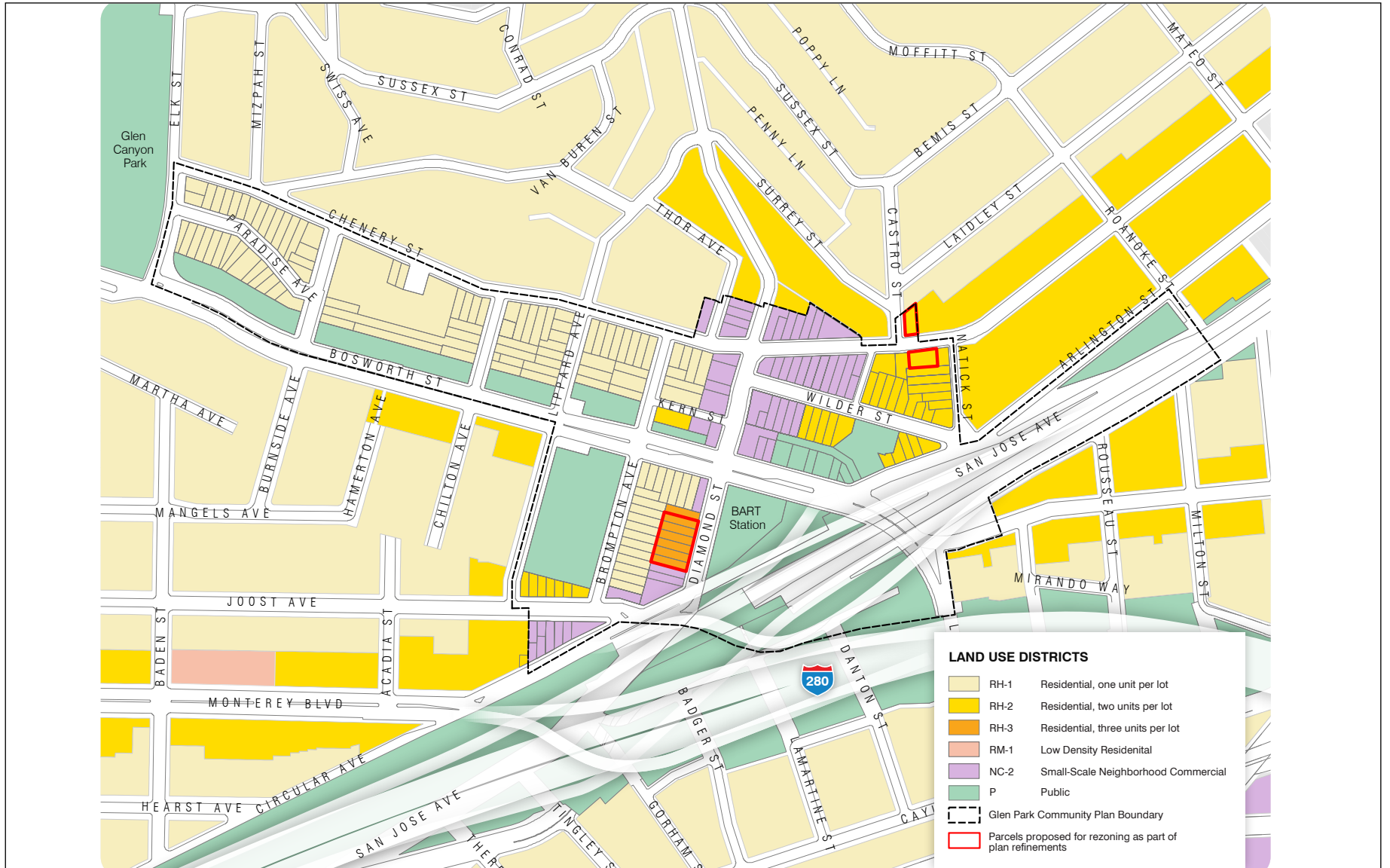
Subsequent to publication of the DEIR, the Planning Department further refined the *2010 Community Plan* in response to community comments and suggestions.¹ This section provides a summary of the proposed refinements. These refinements include rezoning selected properties on portions of Diamond Street, Chenery Street, and Castro Street to better reflect existing uses and character. In addition, the Planning Department has revised the height districts in the *2010 Community Plan* to more closely reflect the height of existing development. The refinements also include modifications to policy and supporting language to reflect the use and height district changes, to express support for carsharing, to acknowledge community concerns regarding daylighting of Islais Creek, and to clarify the plan language. Finally, the refinements include changes to the Implementation Program to clarify that the San Jose Avenue Redesign project actions will focus on feasibility analysis during the plan timeframe. All other aspects of the *2010 Community Plan* remain as described in Chapter II, Project Description, of the DEIR. As discussed below, none of the refinements result in new significant environmental impacts not already identified in the DEIR or an increase in the severity of impacts identified in the DEIR.

Use District Refinements

2928-2958 Diamond Street

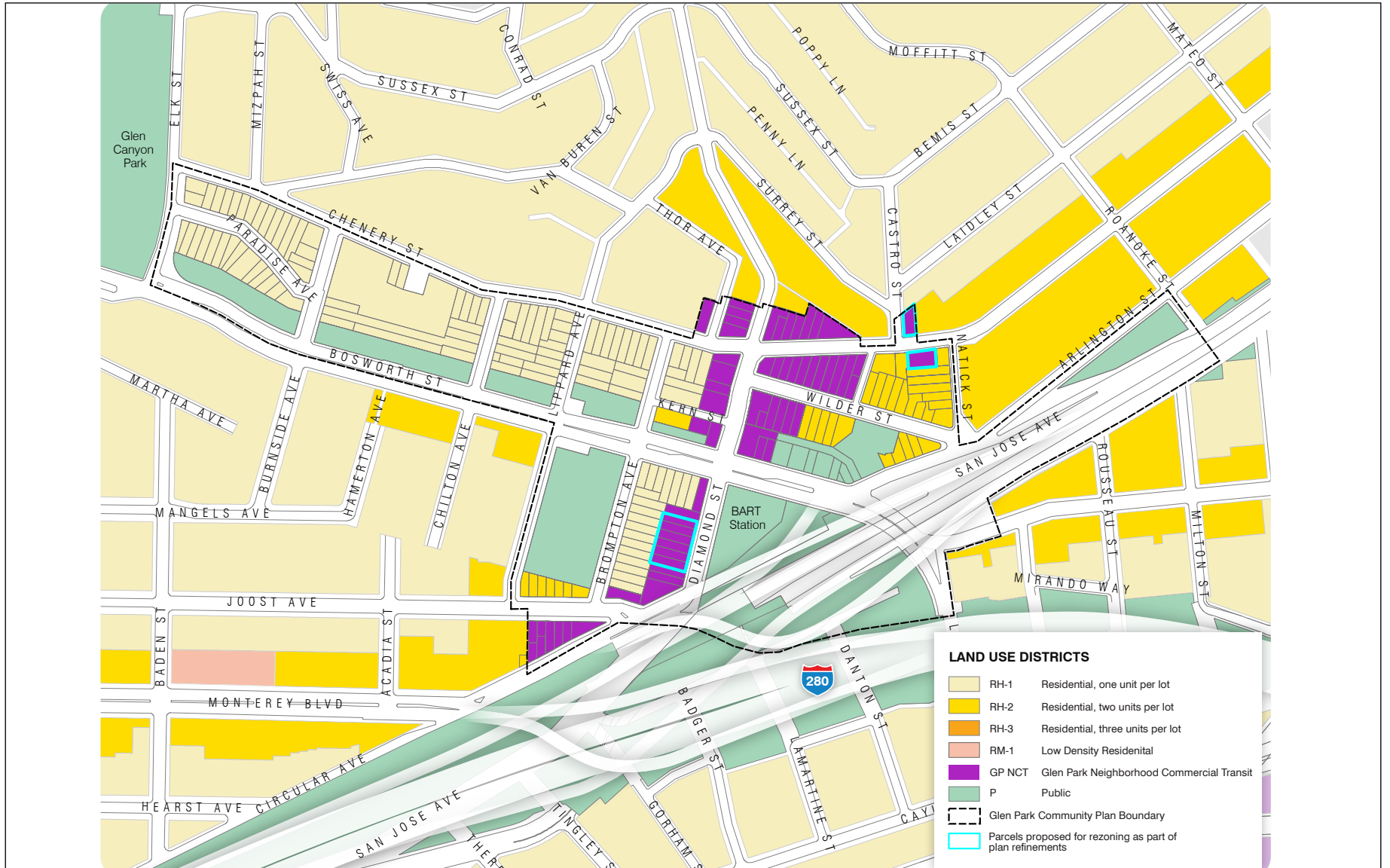
The plan refinements include rezoning six residential apartment buildings on the west side of Diamond Street (2928-2958), between Bosworth Street and Joost Avenue, from Residential House, Three Family (RH-3), as shown in Figure C&R-1, p. C&R-6, to Glen Park Neighborhood Commercial Transit (NCT), as shown in Figure C&R-2, p. C&R-7. As shown in the figures, the six parcels on Diamond Street are across the street from the Glen Park BART Station and are situated between mixed-use commercial and residential uses on either side. The current RH-3 zoning allows up to three dwelling units per 1,000 gross square feet (gsf) of lot area with a conditional use permit. The six parcels are currently occupied by three-story residential structures with ground-floor garages. Rezoning these six parcels to Glen Park NCT would be consistent with the rezoning of the parcels to the north and south along Diamond Street in Glen Park's commercial core already proposed as part of the *2010 Community Plan*.

¹ The City and County of San Francisco, Planning Department, *Glen Park Community Plan Refinements Subsequent to Draft EIR Publication*, Memorandum from Jon Swae to Lisa Gibson, September 23, 2011. See Appendix 3 of this Comments and Responses document.



SOURCE: CCSF Planning Department, 2011.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-1: EXISTING ZONING IN GLEN PARK



SOURCE: CCSF Planning Department, 2011.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-2: PROPOSED ZONING UNDER THE 2010 COMMUNITY PLAN

605 Chenery Street and 3121-3125 Castro Street

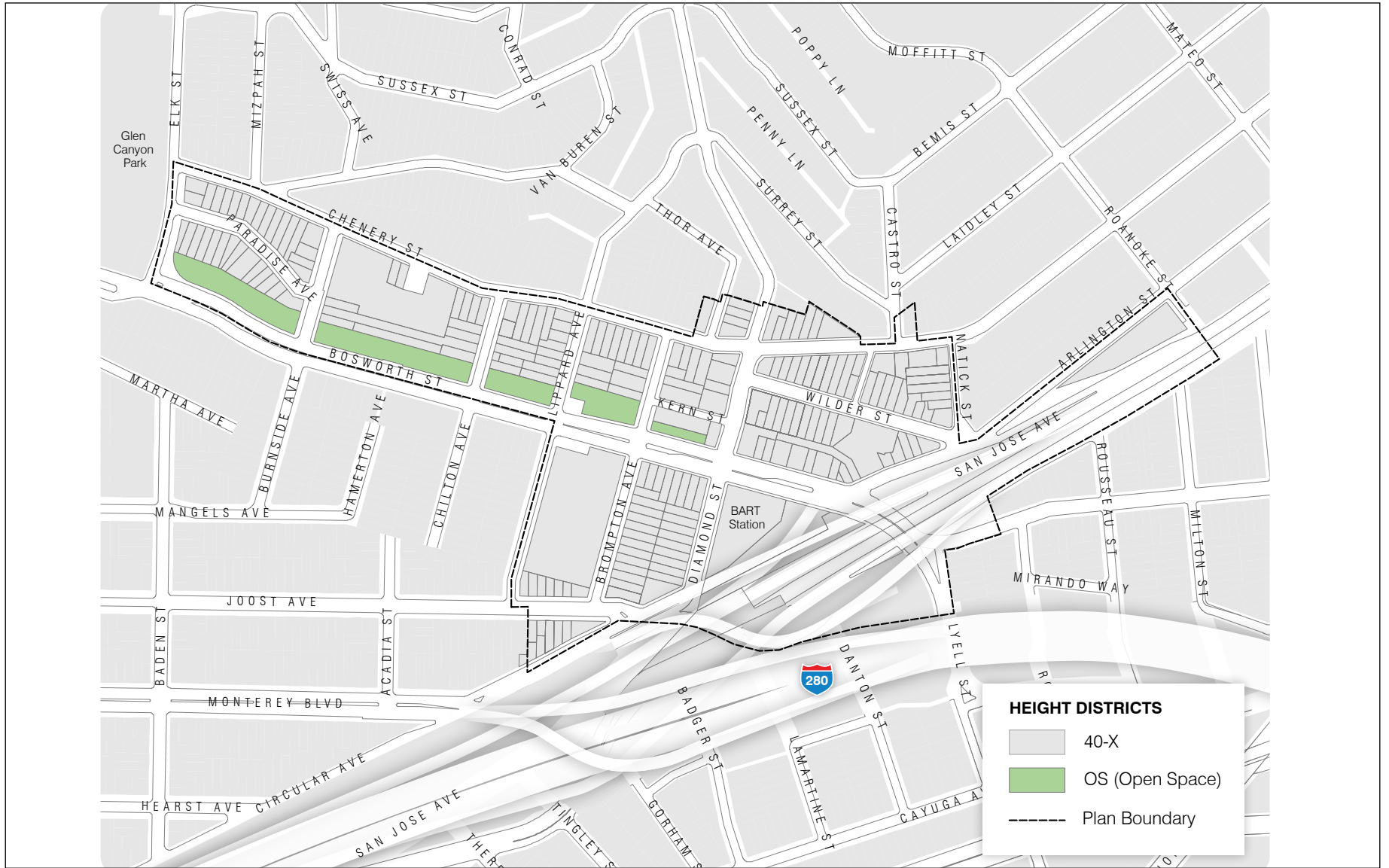
In addition to the properties on Diamond Street, the plan refinements include rezoning two residentially zoned properties, 605 Chenery Street and 3121-3125 Castro Street, from Residential House, Two Family (RH-2) to Glen Park NCT, as shown in Figure C&R-1 and Figure C&R-2, p. C&R-6 and C&R-7, respectively. The property at 3121-3125 Castro Street is not currently in the plan area and the *2010 Community Plan* area boundary would be adjusted to include this parcel, as shown in Figure C&R-1 and Figure C&R-2. The two parcels at 605 Chenery Street and 3121-3125 Castro Street are zoned residential, but are currently occupied by commercial uses. The building at 605 Chenery Street is one story and operates as a commercial use. The property at 3121-3125 Castro Street is occupied by a two-story mixed use building with a bakery on the ground floor and residential uses on the second floor. The current zoning designation, RH-2, allows up to two dwelling units per 1,500 gsf of lot area. Under the proposed Glen Park NCT zoning, these properties would be formally recognized as part of Glen Park's commercial district.

Height District Refinements

All height limits within the plan area are 40-X with the exception of the San Francisco Public Utilities Commission (SFPUC) easement, which is designated as an Open Space (OS) district (no limits apply), as shown in Figure C&R-3, p. C&R-9. As detailed in the DEIR, p. II-13, under the proposed Glen Park NCT zoning the height limit would be increased to 45 feet to encourage active ground-floor uses. However, the recommended height district refinement includes reducing the maximum height of new construction along portions of Wilder Street, Diamond Street, Castro Street, and Chenery Street in the Glen Park NCT District from a range of 40 to 45 feet to a range of 30 to 35 feet, as shown in Figure C&R-4, p. C&R-10.

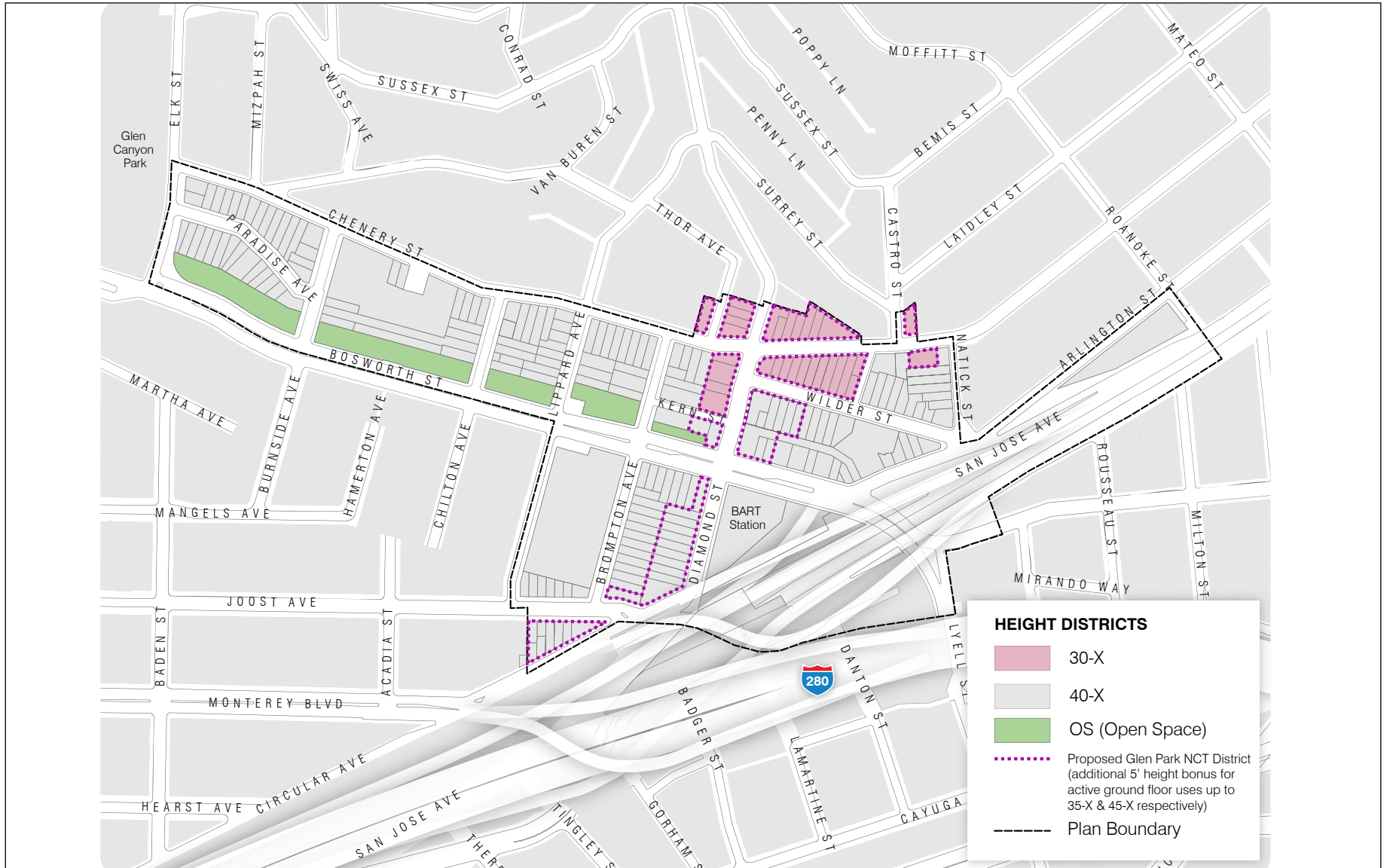
Plan Boundary

As noted above, the *2010 Community Plan* area boundary would be adjusted to include the property at 3121-3125 Castro Street. The fronting street and intersection would be included within the boundary adjustment, as show in Figure C&R-1 and Figure C&R-2, p. C&R-6 and C&R-7, respectively.



SOURCE: CCSF Planning Department, 2011.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-3: EXISTING HEIGHT LIMITS IN GLEN PARK



SOURCE: CCSF Planning Department, 2011.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-4: PROPOSED HEIGHT LIMITS UNDER THE 2010 COMMUNITY PLAN

Policy and Supporting Language

The refinements to the *2010 Community Plan* include modifications to policy and supporting language in the following elements:

- Land Use and Urban Design – Revised and new policies to reflect the above-described zoning modifications and to clarify language regarding building design;
- Transportation – A new policy to support carsharing in Glen Park; and
- Open Space – Revision of policy language regarding daylighting of Islais Creek to acknowledge community concerns that should be assessed as part of any future study.

Implementation Program

Finally, the refinements include a revision to the Implementation Program to reflect that the action item for the San Jose Avenue Redesign will focus on assessing the feasibility of this project.

Effects of the Plan Refinements

The refinements to the *2010 Community Plan* made subsequent to publication of the DEIR require minor changes to the DEIR. Any changes in the environmental analysis as a result of these refinements, including graphic illustrations, are reflected in the Staff-Initiated Text Changes in Section E, Draft EIR Revisions, starting on p. C&R-91. Text in the Summary, Introduction, Project Description, Land Use, Aesthetics, Cultural and Paleontological Resources, Transportation and Circulation, Air Quality, Greenhouse Gas Emissions, Other CEQA Considerations, and Alternatives sections have been revised to reflect the plan refinements. No revisions have been made to the Noise and Vibration section, because the plan refinements would not affect the environmental analysis in this section. As discussed below, none of the refinements result in new significant environmental impacts not already identified in the DEIR or an increase in the severity of impacts identified in the DEIR.

Summary, Project Description, Land Use, and Aesthetics

As noted above, the *2010 Community Plan* area boundary would be adjusted to include the property at 3121-3125 Castro Street. Accordingly, the project boundary (referred to in the EIR as the “plan area”) has been revised to include this property and the fronting street and intersection. As such, nine figures in the DEIR have been revised to reflect this revision. The revised figures are included in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91.

The proposed rezoning of the six parcels on Diamond Street (2928-2958) would increase the commercial development potential within the plan area. Given the existing residential uses, it is not yet known at this time if commercial development would occur on the ground floor of these six parcels. However, it is expected that commercial development could occur through the year 2030, the planning horizon for the purpose of this EIR. The rezoning of the six parcels on Diamond Street to Glen Park NCT could potentially allow the conversion of ground-floor garages into commercial spaces at some future time while allowing existing residential units to remain. Assuming that half of the garages would redevelop by 2030 in response to the zoning change, the amount of commercial space that could be created was estimated to be approximately 5,250 square feet (sf).² To acknowledge the increase in commercial development potential at these six parcels, changes have been made to the Summary, Project Description, Land Use, and Aesthetics as shown in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91. The proposed rezoning of 605 Chenery Street and 3121-3125 Castro Street is not anticipated to change the development potential of these parcels, considering their current commercial uses.

As described above, the height district refinement would reduce the maximum height of new construction along portions of Wilder Street, Diamond Street, and Chenery Street in the Glen Park NCT District from a range of 40 to 45 feet to a range of 30 to 35 feet. For the purpose of this EIR, a height limit of 45 feet in areas rezoned to Glen Park NCT is still analyzed to present a conservative estimate of impacts. As shown in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91, revisions have been made to the Project Description, pp. II-3 and II-13, and Land Use section, p. III.B-12, to explain what is being analyzed. The parcels being downzoned from a range of 40 to 45 feet to a range of 30 to 35 feet are currently developed as residential and commercial uses in the Glen Park commercial core. Since none of the existing buildings is above 35 feet, none would become nonconforming structures with the implementation of the *2010 Community Plan*. The downzoning would not alter existing conditions and, thus, it would not have a physical effect on the environment. The downzoning would reduce future development that might have occurred under the existing zoning (up to 40 feet). Under the existing 40-X height limit, there has not been an incentive for

² Atkins, *Glen Park Community Plan EIR – Additional Retail on Diamond Street Associated with Plan Refinements Subsequent to DEIR Publication*, memorandum from Gui Shearin to Lisa Gibson, September 28, 2011. This memorandum is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004!. Based on an aerial photograph, the buildings are approximately 25 feet wide and 65 to 70 feet deep. The total ground-floor area of the six residential properties is approximately 10,500 sf. For this analysis, it was estimated that up to half, or 5,250 sf, of the property ground-floor garages would be developed into commercial space.

property owners to demolish existing structures and construct new taller ones. Under the reduced height limits, there would be even less incentive to alter land uses in the Glen Park commercial core.

The Aesthetics section, p. III.C-7, has been slightly revised to address all the properties under the plan refinements that would be rezoned to Glen Park NCT with implementation of the *2010 Community Plan*. The revisions to the text can be found in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91. As noted above for Land Use, these plan refinements are recommended in large part to better reflect existing uses and building heights in selected locations of the plan area. Since these refinements would not result in changes to the existing conditions of these properties, there would be no adverse aesthetic effects from the refinements.

The plan refinements to policy and supporting language do not require revisions to the Summary or Project Description chapters of the DEIR, because those sections focus on and describe the primary objectives of the *2010 Community Plan* and not the specific policies intended to carry out the over-arching objectives. Similarly, the Summary and Project Description chapters do not describe the Implementation Program in any detail. Since these refinements would not require changes to the project description, and because they would not alter the physical environmental effects of the project, they would not alter the analysis or conclusion of the DEIR regarding land use and aesthetic effects.

Cultural and Paleontological Resources

As noted above, the proposed rezoning of the six parcels on Diamond Street (2928-2958) would increase the commercial development potential within the plan area by approximately 5,250 sf. To acknowledge the increase in commercial development potential at these six parcels, revisions have been made to the Cultural and Paleontological Resources section as shown in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91.

The 605 Chenery Street parcel is currently in the plan area and was previously evaluated in the Historic Resources Evaluation (HRE) conducted by Carey & Co., Inc. on December 21, 2010.³ The HRE evaluates the resources' significance under the relevant California Register eligibility criteria: Criterion 1 (Events); Criterion 2 (Persons); and Criterion 3 (Design/Construction). The

³ Carey & Co., Inc., *Historic Resources Evaluation, Draft Glen Park Community Plan, San Francisco, California*, December 21, 2010. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

HRE determined that 605 Chenery Street did not meet the criteria to qualify for inclusion on either federal, State, or local registers of historical resources.

The parcel at 3121-3125 Castro Street is located on the northeast corner of Chenery Street and Castro Street, just outside the DEIR plan area boundary and, thus, was not evaluated in the DEIR. On August 15, 2011 the Planning Department conducted a historical resource evaluation survey to determine the property's eligibility.⁴ The survey concluded that 3121-3125 Castro Street is not eligible for the California Register because it was determined to be not associated with events that have made a significant contribution to history (California Register Criterion 1), nor is it associated with the lives of significant persons in the past (California Register Criterion 2), nor does it embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (California Register Criterion 3). Revisions to text to clarify its ineligibility in the Cultural Resources section, p. III.D-9, can be found under Staff-Initiated Text Changes in Section E, Draft EIR Revision, starting on p. C&R-91. In addition, Atkins determined that there are no archeological resources present in the vicinity of the 3121-3125 Castro Street property.⁵ As such, there would be no new or more severe impacts to archeological resources in the plan area, and revisions to the Cultural and Paleontological Resources section of the DEIR are not required.

Transportation and Circulation

As explained above, the amount of commercial space that could result from the rezoning of the six parcels on Diamond Street (2928-2958) is up to approximately 5,250 sf. The Transportation and Circulation section of the DEIR, p. III.E-30, explains that the traffic analysis used a conservative estimate of development potential in the plan area. There are approximately 7,000 sf of existing commercial uses at the Diamond Street/Bosworth Street infill site. This commercial floor area and the associated trips would be displaced by new infill development at this site. The EIR assumed 8,582 sf of new additional commercial space at this infill site, without crediting the 7,000 sf of existing commercial uses (as typical in project level trip generation analysis) that could be removed to accommodate the new infill development.

⁴ San Francisco Planning Department, *Historic Resources Evaluation Response, Glen Park Community Plan – July 2011 Refinements*. August 16, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

⁵ Atkins, *Glen Park Community Plan EIR – Archeological Resources Response Memorandum*, from Denise Jurich to Randall Dean and Lisa Gibson, August 9, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

Although this was appropriate for the program-level analysis of this potential future development, this overestimate of commercial floor area (7,000 sf) and the associated trips (approximately 1,050 existing person trips, 95 of those in the PM peak hour, and 14 PM peak hour vehicle trips) would be considered conservative for the traffic analysis in the DEIR. As a result, even though the recommended rezoning of the six parcels on Diamond Street south of Bosworth Street would yield additional potential commercial floor area of about 5,250 sf and a greater number of trips in the Glen Park commercial core, the commercial space and associated trips are already accounted for with the conservative assumptions and analysis performed for the Diamond Street/Bosworth Street infill site in the DEIR. Therefore, no new analysis is necessary to address the rezoning of these parcels to Glen Park NCT.

It should be noted that the 7,000 sf of existing commercial uses are located on the northwest side of the Bosworth Street/Diamond Street intersection, while the potential 5,250 sf of new commercial uses are on Diamond Street south of the intersection. The difference in locations was determined to have little effect on the overall circulation and traffic effects identified in the DEIR because more trips would go south on Diamond Street than north from the new commercial development due to the accessibility and proximity to I-280 to the south, avoiding the Bosworth Street/Diamond Street intersection, as compared to the trips from the existing commercial space. Because the Bosworth Street/Diamond Street intersection is a critical intersection in the area, the existing commercial space (7,000 sf) would have a relatively greater effect on this intersection than those from the potential commercial uses on the six parcels on Diamond Street (5,250 sf). Thus, the analysis of this critical intersection in the DEIR reflects a worse-case condition than if the existing 7,000 sf and associated trips were removed and the 5,250 sf and associated trips were included.

To disclose changes and clarify how these potential trips have been accounted for in the DEIR transportation analysis, revisions to the Transportation and Circulation, p. III.E-30, sections have been made. These changes can be found under Staff-Initiated Text Changes in Section E, Draft EIR Revisions, starting on p. C&R-91. The zoning refinements at 605 Chenery Street and 3121-3125 Castro Street would not generate any additional trips from commercial land use since the parcels are already developed with commercial uses (legal, non-conforming) and are not anticipated to change. Consequently, no additional analysis is necessary for the DEIR. As discussed above, the height district downzoning (from existing 40 feet to 35 feet) would not alter existing conditions and, thus, would not have a physical effect on the environment. If anything, the height reduction could reduce future development that might have occurred under the existing zoning (up to 40 feet), that was analyzed in the DEIR.

The plan refinement adding policy language that encourages carsharing does not affect the DEIR transportation and circulation impact analysis. Though a carshare parking space could be used by multiple households rather than a single household, it still functions as a parking space. For this reason, the policy encouraging carshare parking spaces in the plan area does not require adjusting the mode split, trip generation, or parking demand assumptions used in the transportation analysis.

Air Quality

The plan refinements would potentially increase commercial floor area in the plan area by 5,250 sf. As a result, the maximum commercial floor area would increase from 23,495 sf to 28,745 sf, as shown in the revision to Table II-2, p. II-19, under Staff-Initiated Changes in Section E, Draft EIR Revisions, starting on p. C&R-91. As a result, the URBEMIS modeling results were updated to reflect the increase in commercial floor area. Based on URBEMIS modeling results,⁶ the increase in construction-related and on-site operational emissions associated with the additional 5,250 sf of commercial uses would be negligible. Table III.G-6, p. III.G-25, and Table III.G-7, p. III.G-29, have been updated to reflect the revised model results. These revisions can be found under Staff-Initiated Changes in Section E, Draft EIR Revisions, starting on p. C&R-91. As shown in the table, emissions would still be below BAAQMD thresholds and, thus, would not result in a significant air quality impact.

Introduction, Greenhouse Gas Emissions, Other CEQA Considerations, and Alternatives

As noted above, the plan refinements would potentially increase the commercial floor area in the plan area by 5,250 sf. In addition to the sections noted above, the Introduction, Greenhouse Gas Emissions, Other CEQA Considerations, and Alternatives sections have been slightly revised to acknowledge that 5,250 sf of ground-floor commercial uses could potentially be built on the six parcels on Diamond Street (2928-2958) that would be rezoned to Glen Park NCT with implementation of the *2010 Community Plan*. The revisions to the text can be found in Section E, Draft EIR Revisions, under Staff-Initiated Text Changes, starting on p. C&R-91. Since these refinements only require minor changes to the Introduction, Greenhouse Gas Emissions, Other CEQA Considerations, and Alternatives sections, and because they would not alter the physical environmental effects of the project, they would not alter the analysis or conclusion of the DEIR in these sections.

⁶ Atkins, *Glen Park Community Plan EIR – Urbemis Update Associated with Plan Refinements Subsequent to DEIR Publication*, memorandum from Kimberly Comacho to Lisa Gibson, October 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as a part of Case No. 2005.1004E.

Noise and Vibration

The Noise and Vibration section has been reviewed to determine if the plan refinements would have an environmental effect on this environmental topic. Overall, the plan refinements would not alter the environmental analysis for this topic. Thus, the refinements would not result in any new significant environmental impacts or increase the severity of previously identified environmental impacts. No changes to this section are required.

Summary of New Effects and CEQA Conclusion

As described above, none of the plan refinements would result in a new significant environmental impact not already identified on the DEIR or increase the severity of previously identified environmental impacts. *CEQA Guidelines* Section 15088.5 requires that a lead agency recirculate an EIR when significant new information is added to the EIR after public notice for public review of the DEIR, but prior to certification. "Information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project, or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it; and/or
- The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified (*CEQA Guidelines Section 15088.5 (c)*). As described above, the refinements to the *2010 Community Plan* are minor changes to the DEIR and would not result in any of the circumstances triggering recirculation pursuant to *CEQA Guidelines Section 15088.5*.

D. COMMENTS AND RESPONSES

GENERAL COMMENTS

Comment GC-1: *The DEIR complies with CEQA.*

"The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 10, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State - Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

"Please note that Section 21104(c) of the California Public Resources Code states that:

'A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.'

"These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

"This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process." (*Scott Morgan, State of California Governor's Office of Planning and Research, Letter, June 13, 2011*)

Response GC-1

The comment acknowledges that the Glen Park Community Plan DEIR complies with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. Accordingly, no further response is needed.

Comment GC-2: *The DEIR was not listed as being available at the Main Branch of the SF Public Library and the public review period should be extended.*

"I need to study the draft EIR further at the Main Branch of the SF Public Library using their digital magnification equipment.

"However, the Main Branch was not listed as a place where a copy can be found.

"And the Glen Park Branch doesn't have that equipment. Only the Main Branch does.

"So please continue this matter until a month after copy has been delivered to the Main Branch and you have notified me by e-mail." (*Philip Siepert, Resident, E-Mail, June 2, 2011*)

Response GC-2

The commenter is concerned that Glen Park Library did not have equipment for the visually impaired to view the DEIR. During the public review period, the DEIR was available for review at the San Francisco Main Library, 100 Larkin Street, from April 27, 2011 to June 13, 2011. Notification of this availability was posted on the Glen Park Community Plan website (<http://www.sf-planning.org/index.aspx?page=1666>). After Mr. Siepert sent his email on June 2, 2011, the City replied the same day by email that the document could be viewed at the Main Library, which has facilities for the visually impaired, until June 13, 2011. Since there were 11 days remaining in the public review period, the City considers this sufficient time to review the DEIR and did not extend the public review period.

Comment GC-3: *The public meetings on the DEIR and 2010 Community Plan provided opportunities to offer input.*

"I wanted to thank the Planning Department, especially John Swae and John Billovits, for the attention that they've been paying to input from the community. And we've noticed, as this plan has been rolling forward, that it's changing to reflect the community's concerns; and we appreciate that very much. I think there's further to go on that, obviously, as it gets closer to your attention; and there will be plenty of time for you to decide on when it gets in front of you.

"So thank you very much for this opportunity to address you; and I look forward to sending in the written comments in a couple of weeks." (*Nicolas Dewar, The Glen Park Association, Public Hearing, June 2, 2011*)

"Yes. I had the pleasure of attending either two or three -- I think possibly three -- of the community meetings in this area prior to the development of the EIR. I found them very well attended, as I believe I mentioned before, and very interactive in the Q-and-A sessions with the participation of the community there. And then I think that's the way these types of area developments should go forward." (*Vice President Miguel, San Francisco Planning Commission, Public Hearing, June 2, 2011*)

Response GC-3

The commenters express appreciation for the public outreach efforts. City staff is making concerted efforts to ensure that as many opportunities as possible are afforded to the community to participate in planning efforts that affect their neighborhoods.

Comment GC-4: *Comments on the DEIR are forthcoming and will be submitted in writing.*

“Good afternoon, Commissioners. My name’s Nicholas Dewar. I’m a resident of Glen Park; and I am on the Glen Park Association. I chair the association's zoning and planning committee.

“The association is going to submit comments in writing before the 13th of June, so I won't go into that right now. But I do want to tell you that they are coming and we are working hard on them already.” (*Nicolas Dewar, The Glen Park Association, Public Hearing, June 2, 2011*)

Response GC-4

The commenter’s statement that the Glen Park Association will be submitting comments in writing does not raise concerns about the DEIR; therefore, no further response is necessary. Responses are, however, provided in this Responses to Comments document to individual comments in the letter submitted by the commenter on June 13, 2011.

Comment GC-5: *Alternative B presented in the DEIR is preferable.*

“Finally, there are three development options. And I support Plan B with the little denser housing and less impact from traffic and so forth. That's my suggestion for the Commission, yes.” (*Sally Ross, Resident, Public Hearing, June 2, 2011*)

Response GC-5

The commenter’s support for Alternative B is acknowledged. The Planning Commission will consider such comments during the hearings on the merits the *2010 Community Plan*. Accordingly, no further response to this comment is necessary.

Comment GC-6: *The DEIR impact methodology considers the effects of the maximum potential development and the transportation effects have been well considered.*

“Just so the public understands, what an EIR considers are the maximums. It doesn't mean that everything is going to go to that maximum. But the EIR has to consider it so that anything up to that, but less is still okay when it's considered; and any developments or anything will have to come before the department and Commission in the future.

“In particular, in the summary section, although previous testimony regarding this program when it came before the Commission concentrated a bit on the absence of exact plans from BART for their property, if you will note, particularly as I say, in the summary section on S-4 and S-5 the possible maximum developments on the BART site are fully covered; and so whatever happens there is already considered within this EIR and properly so.

“As to the comments that just came before from the public, what is contained here are possibilities and suggestions. It doesn't, obviously, mean any of it is going to happen in that exact manner; and there can be a little bit of pick-and-choose by the time you get to the final.

“I find it interesting that, basically of in-fill development, we are talking of an absolute maximum of 150, which is not massive. But this is a very, very tight community and a very tight area, if anyone is familiar with it. And 90 of those are the possibility for the BART parking lot itself. So when you take that away, we're not talking of a lot of development.

“The transportation and movement section is probably the most important. That is the biggest consternation in that area of how anyone gets around, whether it be pedestrian, bicycle, motor vehicle, or BART, for that matter. And I think they are very, very well considered.

“I find this EIR a little different than some I've criticized before. It does not sound like a PR project and written by a developer; and I am very glad to see that.” (*Vice President Miguel, San Francisco Planning Commission, Public Hearing, June 2, 2011*)

Response GC-6

The commenter offers information about the methodological approach used in EIR impact assessments. Specifically, the commenter notes the need to evaluate the maximum amount of development, even if that is not what may eventually be built, and explains that this approach was followed in the DEIR. The commenter also acknowledges the objectivity of the DEIR. Accordingly, no further response is necessary.

Comment GC-7: *The impact methodology, significance criteria, and assumptions presented in the DEIR may not be appropriate for projects for which BART may act as the lead agency.*

“This letter provides the comments of the San Francisco Bay Area Rapid Transit District (‘BART’) on the draft environmental impact report (‘draft EIR’) prepared for the Glen Park Community Plan pursuant to the California Environmental Quality Act (‘CEQA’) (Footnote: Cal. Pub. Res. Code § 21000 et. seq. CEQA is implemented through the State CEQA Guidelines (‘Guidelines’), 14 Cal. Code Regs. § 15000 et seq.). The draft EIR studies the potential environmental effects associated with the adoption of the 2010 Community Plan for the Glen

Park neighborhood, in particular related to land use and urban design, transportation improvements, and creation of open space. As particularly relevant to BART, the draft EIR analyzes the potential environmental effects of allowing mixed commercial and residential infill development on the BART parking lot currently serving BART's Glen Park Station. The draft EIR considers a maximum build-out scenario of 90 residential units, 14,913 square feet of commercial space, and 123 parking spaces.

"BART appreciates the City's efforts in preparing the 2010 Community Plan and the draft EIR, as well as the opportunity to comment on the draft EIR. BART believes the City has done an excellent job in preparing the draft EIR and creating a vision for the Glen Park neighborhood that includes a strong transit-oriented development ('TOD') opportunity for the BART parking lot. To this end, BART's comments on the draft EIR do not concern any alleged inadequacies with the environmental analysis. To the contrary, BART believes the draft EIR is legally adequate for purposes of adopting the 2010 Community Plan and supporting future TOD in the Glen Park neighborhood.

"Instead, BART's comments focus on three policy determinations the City has made in the draft EIR concerning (i) the modeling of trip generation and transportation mode splits for TOD projects considered in the Plan, (ii) the significance criteria used for assessing the 2010 Community Plan's impacts on BART service, and (iii) the identification of the BART's Glen Park Station as an historic resource that might be effected by implementation of the 2010 Community Plan. BART recognizes that the City, as the CEQA lead agency for the draft EIR, has the discretion to establish the methodology for analyzing, and the criteria for assessing the significance of, the environmental effects of the 2010 Community Plan, provided the methodology and significance criteria are supported by substantial evidence. The City also has discretion to identify the significant effects of the 2010 Community Plan, again subject to support by substantial evidence in the record. As noted in its comments below, BART does not question the City's exercise of discretion, or the sufficiency of the evidence supporting such exercise, in these areas.

"Rather, the sole purpose of these comments is to recognize that, while the methodology, significance criteria, and assumptions used in the draft EIR may be appropriate for purposes of assessing the impacts of the 2010 Community Plan, the same methodology, criteria and assumptions might not be appropriate for other projects, including particularly projects for which BART might act as the lead agency. BART therefore is going on record here concerning these issues in order to reserve the right to exercise its discretion on these and other issues in manner different than, and perhaps even directly contrary to, the City's determinations in the draft EIR, subject, as with all discretionary determinations, to support by substantial evidence."
(Jeff Ordway, BART, Letter, June 13, 2011)

Response GC-7

This comment states that the City has done an excellent job in creating a vision for strong transit-oriented development and that the DEIR is legally adequate. BART's statement that it reserves the right to exercise its discretion on its methodology, significance criteria, and assumptions on future projects within Glen Park where BART might act as the lead agency is acknowledged. No further response is necessary.

Comment GC-8: *The daylighting of Islais Creek raises a number of potential impacts that require further consideration in the DEIR.*

"The Idea of 'daylighting' Islais creek is a really really BAD IDEA!!! If the creek is daylighted along Kern Street:

1. Who pays for the Flood insurance for the residents and home owners! You will be creating a flood plain.
2. Who will keep the grates where the creek goes underground CLEAN AND FREE OF DEBRIS! Every time it rains, we need to clean the grates at the low point on Chilton Ave.
3. Who controls the mosquitoes when the creek forms standing water and wetlands.
4. When the city has financial problems creating more expense in the form of a worker to maintain the creek seems not so bright an idea.

As a homeowner I am very much against the creating of water problems in my neighborhood."
(Lesley Kinnear, Resident, Letter, May 23, 2011)

"Problems Related to Failure by the City of San Francisco to Maintain this Land - We have lived in this house for almost 13 years. During that time, the undeveloped city land and the land owned by St. John's School that surrounds our house have been very poorly maintained. Despite many repeated requests neither the City nor St. John's School has ever taken responsibility for maintaining it. (Instead, the neighbors have had to organize neighborhood cleanups.) Here are some examples:

- **Hazardous Trees** - The greenbelt that runs between my house and Bosworth Street is filled with dead and dying trees (which all seem to be riddled with the same fungus). I reported them to the City on September 9, 2011. About a month after that call, the Department of Public Works posted a tree removal sign outside my house. I found the name of Robert Stafford on that posting and called him. He informed me that the DPW would only remove the one tree that was closest to my house. (That operation occurred on October 21, 2010.) In our phone call, Mr. Stafford told me that since the other dead trees did not threaten houses they would be addressed later. He also told me that my request to trim tree limbs that

extend over my house would be put off until a later time. On March 20, 2011, one of the trees that the DPW declined to cut down in September fell across a footpath frequently used by residents of Glen Park (and prominently featured in the Draft EIR) and landed dangerously close to both my back yard and the St. John's School play yard (each places where many children play daily). The tree fell into the standing water on the footpath (caused by the rains that came with the storm that felled the tree). I immediately called 311 and sent emails to the DPW and Mr. Swae requesting that the City promptly remove ALL of the dead trees in that area and trim back the heavy limbs reaching over my house (and the house of my neighbors at 45 Chilton Avenue). To date none of these actions have taken place.

- **Trash Dumping** - Homeless live out in the high bushes of the greenbelt during most of the year. They leave lots of trash and start fires. In addition, many folks dump their trash down off Bosworth Street. Finally, all of the trash from St. John's schoolyard blows down into that area. Despite my many, many requests that the City and St. John's clean up this land, it remains riddled with trash.
- **Fire Hazard** - The 8 to 10 foot high weeds that grow annually in this area create an enormous fire hazard. I have contacted the City many, many times about this problem. They have sent crews to clear the land only twice in the last 13 years.
- **Flooding** - As noted in the first bullet above, this land FLOODS every time it rains. St. John's School has covered its entire yard with tarmac but has not provided any drainage for it. The yard slopes downhill and water runs off the tarmac to the natural streambed below. We have repeatedly asked St. John's to comply with the law and provide adequate drainage for their property but those requests have been ignored. We have also asked the City to force St. John's to comply with the law. Those requests have also been ignored. After years of having half a foot to a foot of water sitting next to our foundation, we finally worked with our neighbors to lease the land north of our house from the San Francisco Public Utilities Commission. We then landscaped, graded and added drainage to the land all at our own (and not insignificant cost) - merely to protect our foundations. The land behind and to the west of our house still floods and remains flooded for several months each year - even after years of drought. Given that the City does not clean up fallen trees or dumped garbage or require St. John's to properly drain its land, you can only imagine what a mess it becomes.
- **Mosquitoes** - In addition to the property damage, the standing water also results in horrible mosquito problems in warm weather.

“Given this track record, I have very little faith that the city can maintain Islais Creek if it ever brings its water above ground. I am concerned that the flooding will get worse and that the trash, weeds and homeless will only increase. On top of all of that, the trash and weeds would then exist in a wet marshy area - making an even larger mess and attracting even more mosquitoes. Therefore, I request that the EIR require the City to fully address all of these problems and concerns.

- **Public Safety Concerns** - The Draft EIR cites creek bed and bank erosion as the chief concerns related to daylighting Islais Creek. This is a very real concern that I expect you will address. I was surprised, however, to find that the Draft EIR does not seem to cite any other concerns. In addition to the very real risk of erosion and the flooding, trash, falling trees and fire hazards cited above, I would like for the City to also consider:
 - **Hazardous Waste** - As described above, chemical, biological and other waste gets dumped into the greenbelt and former streambed on a regular basis. I am surprised that the that the Draft EIR did not require testing of the greenbelt and former streambed for toxic chemicals and other waste (from the animals that are walked in the area, the cars that use the St. John's lot and the trash and other waste dumped in the area). Please include this sort of testing in your study.
 - **Sewage Back Up** - On several occasions during large storms, sewage has backed up and out of sewers and toilets in the neighborhood. This has mostly occurred further east of our block but it has also occurred on our block. Since it has happened more than once in my almost 13 years here, these are not the 200 year storms referenced in the Draft EIR. Rather, it seems to be a due to inadequate sewage and storm water drainage. I fear that these inadequate systems would cause a daylighted Islais Creek and the greenbelt around it to become a swampy sewer. I would like for the Draft EIR to require testing on the adequacy of these infrastructural systems to see if they can support the proposed daylighting project.
 - **Children and Pets** - Several small children live, play and go to school in this area. Many folks also use it to walk their dogs. I have many concerns about the daylighted creek - especially where it would come above and go back under the ground and the safety of the areas children and pets. I would like for the City to fully account for these concerns in any future proposals." (*Maria Hekker, Resident, Letter, May 25, 2011*)

"I am submitting these comments for inclusion in the DEIR proposal to the Planning Commission. It outlines my very serious concerns regarding the day lighting of Islais Creek.

"I live at 56 Chilton Avenue, which abuts the easement through which the creek could theoretical flow. Maria Hekker and Jeff Tyce own the house at 88 Chilton Avenue, which is on the other side of the easement.

"I must point out that the concerns I am raising in this letter are concerns that the neighbors of Chilton Avenue have raised repeatedly in the past. It is with consternation and a great sense of confusion that I raise the question of why these issues continue to go unaddressed. They certainly are relevant to the Draft Environmental Impact Report. Many of the residents of Chilton Avenue have sent written comments to both you and John Swae regarding this creek issue. The neighbors on Chilton Avenue (i.e the people who would be directly impacted by this proposal) have had a meeting with John at my house to discuss this issue. There is not a single person on this block who is not adamantly opposed to this idea for a number of reasons. We have voiced our concerns over and over again, but they go unaddressed as this plan continues

to evolve. I am copying our District Supervisor Scott Weiner on this letter in the hope that his involvement might help bring some focus to our concerns.

“From the highest level, let me just comment on what is being proposed here. We are talking about voluntarily introducing a body of moving water between two houses that sit less than twenty-five feet apart. Water damages foundations. Water erodes soil. Moreover, we are talking about houses that sit in an earthquake zone where liquefaction is already an issue. We are in effect talking about voluntarily introducing unnecessary structural risks to people's houses. I notice that the Draft EIR does cite creek bank erosion as an area of study, but does not mention the risks posed to our houses. Should there not be a full seismic review performed to assess the increased seismic risks to our houses?”

“I was surprised to read that none of the other concerns that my neighbors and I have repeatedly raised have been addressed. They are:

- **Garbage:** The creek would flow through a valley situated between St. John's School and Bosworth Avenue. There is a tremendous amount of trash that blows down from both areas, trash that does not ever get cleaned up unless the neighbors take the initiative to do so. If we put a creek through that location, it will be constantly filled with litter and trash.
- **Hazardous Waste:** Why is there nothing in the draft EIR to study the soil quality and the water quality in the easement. Not only do people dump all kinds of waste back in that area, but also there is a tremendous amount of run-off from St. John's School. St. Johns has almost a whole city block of asphalt with absolutely no drainage provisions. The tarmac simply runs off into that land and has likely accumulated all kinds of toxic chemicals. Moreover, what is the water quality that already runs through Islais Creek? Does it already have chemicals in it?
- **Flooding:** Because of the run-off from St. Johns and the lack of drainage, the easement behind our houses is flooded during rainy season. This would be exacerbated with a creek running through it.
- **Maintenance:** The City does not maintain the land as it is. It is currently overgrown with weeds. Moreover, the city easement runs between land that is owned by St. John's School on both sides. How feasible is it to deal with issues of upkeep and safety when the area in question is owned by two separate parties, neither of whom takes any responsibility for its maintenance.
- **Insects:** Insects are already a problem when the weather is warm. This would only be worse if we introduce more water. This increases the risk to my family and the families in the area of insect born diseases.” (*Daniel O’Keefe, Resident, Letter, June 5, 2011*)

“The ‘daylighting’ of Islais Creek is noted as being covered at a program level of analysis in the EIR on page II-5, however, the analysis throughout the EIR is sparse and insufficient to inform decision-making about this proposal. The Initial Study identified mitigation to address potential hydrology and water quality impacts, including the preparation of a Hydraulics and Hydrology

Study; however, without that study it is unclear as to whether daylighting could have significant unavoidable effects or not. The EIR should have addressed to a more detailed level the aesthetic, geologic, hydrologic, land use, noise, air quality and hazard (e.g., mosquito pathogens) impacts associated with daylighting. Although a specific proposal for daylighting has not been made, enough is known about how it could work to provide more meaningful analysis of both the construction of a daylighted stream and the long-term operational impacts of it. Additional analysis should be presented in the EIR, even though it is only addressed at the program level, in order to adequately frame future project level CEQA analysis, similar to the analysis of the BART lot development.” (Nicolas Dewar, *The Glen Park Association, Letter, June 13, 2011*)

Response GC-8

The commenters state a variety of concerns regarding flooding, fire hazards, trash, and insects associated with existing conditions of Islais Creek. Under CEQA, an EIR is required to analyze future impacts to the environment, rather than the impacts of existing conditions on the environment. These comments, along with other comments concerning maintenance, safety for pets and children, and exposure to contamination, will inform the San Francisco Public Utilities Commission and the San Francisco Planning Department in the future when the merits of daylighting Islais Creek are considered.

Some of the commenters’ concerns are addressed in the Initial Study, which was based on the 2003 Glen Park Community Plan Summary (*2003 Community Plan Summary*). As noted on p. 30 of the Initial Study, the *2003 Community Plan Summary* included strategies and design measures for daylighting Islais Creek, which would minimize drainage impacts, including potential flooding impacts. Additionally, according to the Initial Study, daylighting the creek would be accompanied by localized stormwater management programs and the creation of stormwater detention features designed according to the City’s *Better Streets Plan*.⁷ For further information on biological resources, hydrology and water quality, hazards and hazardous materials analyzed in the Initial Study, please refer to Appendix A of the DEIR.

⁷ The *Better Streets Plan* provides design guidance for improvement of San Francisco streets and public areas. This program is described on p. 43 of the Initial Study.

At this time, there are no specific plans to daylight Islais Creek. The *2010 Community Plan* includes Policy 11.4 which states “the San Francisco Public Utilities Commission and the Planning Department should conduct a study to assess the feasibility, benefits, and impacts of daylighting a portion of Islais Creek through Glen Park.” Should the San Francisco Public Utilities Commission and the Planning Department choose to pursue the daylighting of Islais Creek, additional studies are necessary to determine how daylighting could occur and whether the concept is feasible and desirable. Thus, the likelihood, timing, and general definition for a daylighting proposal at this stage are uncertain. The *2010 Community Plan’s* Implementation Program targets 1 to 5 years as the timeframe for conducting a study to determine engineering feasibility, benefits, and impacts of daylighting portions of Islais Creek. While it may be possible to conduct a more detailed analysis of daylighting impacts related to aesthetics, geology, hydrology, land use, noise, air quality, and hazards, such assessments would require making broad assumptions.

For the purpose of this DEIR, daylighting the creek is recognized as part of the Open Space improvements, as shown in the Project Description, p. II-35, but it is clear that further studies would need to be conducted to assess the feasibility of daylighting. As such, daylighting Islais Creek along with other open space recommendations are evaluated at a program level. As stated in the Introduction, p. I-22, “Program EIRs are typically prepared for agency plans, policies or regulatory programs, and generally analyze broad environmental effects of the program with the acknowledgement that site-specific environmental review may be required for particular aspects of the program when those aspects are proposed for implementation.” The *2010 Community Plan* would provide long-term guidance to decision makers and public agencies to ensure future infrastructure projects and land use changes in the Glen Park neighborhood are carried out with sensitivity to the neighborhood’s concerns, needs, and desires. Since there is no proposal to daylight the creek and further environmental analysis would need to take place before any plans are approved, the information provided in this DEIR is sufficient

to inform decision makers on whether to move forward with adopting the *2010 Community Plan*.

INITIAL STUDY

Comment IS-1: *The DEIR does not adequately discuss biological impacts.*

“Nonetheless, I believe there are deficiencies in the report, for instance, in the summary, section II, I saw no mention of urban wildlife study or impacts.” (*Philip Siepert, Resident, E-Mail, June 2, 2011*)

“For instance, where is the biological component?”

“There is significant public space with flora and fauna that would have significant irreversible impacts, yet as far as I can see, the EIR dismisses this in a summary fashion.” (*Philip Siepert, Resident, E-Mail, June 3, 2011*)

Response IS-1

The commenter believes that the DEIR contains deficiencies and states that there was no mention of an urban wildlife study or impacts in the Summary chapter. The project was first evaluated in the Initial Study, the purpose of which was to determine whether an EIR was warranted and then to identify those topics that required further or more detailed investigation. In the Initial Study, which is contained as Appendix A of the DEIR, urban wildlife impacts are addressed under Topic 12, Biological Resources, beginning on p. 81. The Initial Study determined that impacts to biological resources would be less than significant with implementation of Mitigation Measure M-BI-1: Pre-Construction Nesting Bird Survey. This mitigation measure, which is included in the DEIR Summary, p. S-38, would require that any construction avoid the February 1 through August 31 bird nesting period to the extent feasible. If this is not feasible, a pre-construction nesting bird survey shall be conducted by a qualified wildlife biologist. The Initial Study determined that no further analysis of biological resources was required and that, therefore, the topic would not be discussed in the EIR.

See also the plan boundaries that show the primary area of study to be the urbanized portions of the Glen Park community. The EIR does not focus on areas outside this plan

area, because effects of the development and transportation improvements proposed in the *2010 Community Plan* would occur primarily within the plan area. Thus, expansive public open space areas, like the Glen Park natural area that encompasses significant flora and fauna resources, would not be affected and are not discussed.

Comment IS-2: *The DEIR does not adequately discuss the wind and shadow impacts associated with the proposed rezoning.*

“I have emailed pictures to representatives in the planning department to demonstrate how much shadow such buildings create, suggested that higher wind speeds would result (based on experience from other areas in SF) and mentioned that the increased density changes the unique character of our "village". The hills surrounding this neighborhood give it the valley feel and the views of those hills minimize the feeling of cramped city living.

“But please don't surround us with sky-blocking vertical structures!

“As you can see from the attached photos, even a 40-foot building blocks the sun beginning in the early afternoon.” (*Diane Grant, Resident, Letter, June 7, 2011*)

Response IS-2

The commenter expresses concerns over increasing the height limit to 45 feet, including the potential for shadows, increased wind speeds, and changes to the unique character of Glen Park. Implementation of the *2010 Community Plan* would increase the height limit from 40 feet to 45 feet in some areas zoned Glen Park NCT to encourage active ground-floor uses. It is important to understand that CEQA requires the City to identify substantial physical changes to the environment. Substantial changes are generally defined by the standards of significance. It is recognized that all projects will change the neighborhood to some extent; the EIR must identify those changes that are substantial and result in a significant impact. Accordingly, although the proposed *2010 Community Plan* and the NCT zoning may create shadows, the Initial Study, Appendix A, pp. 66 to 67, determined that the proposed infill development is sufficiently distant from the public parks and open spaces under the jurisdiction of the Recreation and Park Department (RPD) that shadows cast by the proposed height limit would not result in an impact. In the case of shadows, Section 295 of the Planning Code restricts new

shadows upon public parks and open spaces under the jurisdiction of RPD during the period of one hour after sunrise to one hour before sunset, at any time of the year by any new structure exceeding 40 feet in height unless the Planning Commission, in consultation with the General Manager of RPD and the Recreation and Park Commission, finds the impact to be insignificant.

The *2010 Community Plan* would increase the height limit to 45 feet in some areas zoned to Glen Park NCT. Therefore, future development under the plan has the potential to be over 40 feet in height and is located in close proximity to Glen Canyon Park and Dorothy Erkin Park, and thus it is subject to Section 295. The Initial Study concluded that while the implementation of the draft *Community Plan* would involve modification of zoning districts and height and bulk controls, the distance of existing RPD-owned parks from the proposed infill development is too far to create a shadow impact.

Additionally, as stated in the Initial Study, Appendix A, p. 66, the City's wind standards do not apply in the plan area because existing structures are less than 40 feet tall, and proposed height limits in the Glen Park NCT District would be 45 feet. As stated on p. 65 of the Initial Study, wind impacts are generally caused by buildings over 80 feet tall in high-density areas, which would not apply to the plan area. Thus, the Initial Study concluded that development anticipated under the draft *Community Plan* would not substantially affect the existing wind environment according to the City's standards.

Implementation of the *2010 Community Plan* would involve revisions to the existing Planning Code use and height districts in the plan area, as described in the DEIR, Project Description, p. II-13. As explained in Section III.B, Land Use, p. III.B-12, future development in the plan area could be higher in density and scale than the low-density, single-family housing surrounding the plan area; however, the scale and character in the surrounding areas would remain intact because future development would be focused in the commercial core of the Glen Park community. Currently, the neighborhood's commercial core is centered on Diamond Street and Chenery Street. Under the NCT

District, development could occur up to 45 feet, a 5-foot increase from what is currently allowed in the commercial core area. The intent of the revised height and bulk controls is to encourage active ground floor uses. It is not intended to allow another floor of development and, thus, new development in accordance with the *2010 Community Plan* would not substantially contrast with uses nearby. In addition, the *2010 Community Plan* includes land use and urban design policies that build on established land use patterns in the Glen Park neighborhood, and would not have a substantial adverse impact on the existing character of the vicinity. Policy 2.4 of the *2010 Community Plan* encourages that the design of the new buildings should be consistent with the neighborhood's existing plan and should reinforce the character of Glen Park. Thus, the scale of new development would be compatible with the surrounding uses and changes in density would not be expected to substantially alter the neighborhood character and scale of the Glen Park community.

PROJECT DESCRIPTION

Comment PD-1: *The project boundaries presented in the DEIR are unclear.*

"Also the map of the boundaries proposed for the affected area seemed to extend beyond the area as described in narrative." (*Philip Siepert, Resident, E-Mail, June 3, 2011*)

Response PD-1

The narrative of the project location in the Project Description, starting on p. II-6 of the DEIR, is a general description of the major streets that border the plan area and is not an exact list of all the streets that define the boundaries of the plan area, as shown in Figure II-1, p. II-7, Regional and City Project Location, of the DEIR. The narrative is not intended to describe the precise plan area boundaries in areas where, for example, the boundary lies between properties and not along a street. As a result, there are portions of the plan area that extend beyond the area described in the text. Nonetheless, the description of the project location in the DEIR is adequate and is clearly illustrated in Figure II-1.

Comment PD-2: *The logic behind the design of the bicycle lanes is unclear in the DEIR.*

“I don't have to explain to you how unique Glen Park is. And I can't fathom the logic behind some of your bicycle lane designs, so I won't even try to discuss that.” (*Diane Grant, Resident, Letter, June 7, 2011*)

Response PD-2

The commenter's statements regarding the bicycle lane designs are acknowledged. As noted in the Project Description, p. II-29 of the DEIR, the *2010 Community Plan* includes policies proposed in the San Francisco Bicycle Plan to implement bicycle network improvements for the Glen Park neighborhood. Approved in June 2009, the bicycle lane improvements proposed in the San Francisco Bicycle Plan are more comprehensive than the bicycle improvements identified in the *2010 Community Plan*. As such, the Bicycle Plan improvements would supersede any bicycle lane improvements identified in the *2010 Community Plan*.

Comment PD-3: *The Community Plan should include additional transportation improvements on Bosworth Street.*

“Other Changes on Bosworth Street

“The DEIR does not evaluate certain changes in Bosworth Street that could meet transportation goals, provide open space improvements, and address parking concerns. The EIR should analyze reconfiguration of Bosworth Street. Bosworth Street is one travel lane in each direction east of Arlington, two travel lanes between Arlington and Elk, and then becomes O'Shaughnessy with one lane in each direction. The Community Plan should consider reconfiguring Bosworth Street between Diamond and Elk to one westbound lane. Turning lanes and bus stop space should be retained as needed. The right-of-way change should provide a 15-foot wider, more level open space corridor contiguous with the existing steeply sloped green space on the north side of Bosworth Street. In addition, diagonal parking on the north side of Bosworth between Diamond and Lippard may be feasible, and would increase the number of short-term spaces available to visitors to the center of Glen Park. The wider open space would continue west of Lippard. If diagonal parking were not feasible, the open space corridor would extend to Diamond. While the EIR must analyze the traffic operations effects of this change, the reduced lanes and diagonal parking could have a traffic-calming effect on this artery...

“TRANSPORTATION

“We generally support any measures that calm traffic in the Glen Park core.

“The Community Plan, as analyzed in the EIR, shows many instances where the safety of pedestrians and bicyclists is weighed against the speed of automobile traffic through the neighborhood. We support the measures that improve pedestrian and bicycle safety and access even if they result in slower speeds for automobiles. Level of service for automobiles is less important than pedestrian safety in Glen Park.

“The Plan should include certain changes on Bosworth Street that would meet Transportation goals, open space improvements, and possible parking changes. The Community Plan should consider re-configuring Bosworth Street between Diamond and Elk to one westbound lane. Turning lanes, and bus stop space should be retained as needed. The right-of-way change should provide a 15-foot wider, more level open space corridor contiguous with the existing steeply sloped green space on the north side of Bosworth Street. In addition, diagonal parking on the north side of Bosworth between Diamond and Lippard may be feasible, and would increase the number of short-term spaces available to visitors to the center of Glen Park. The wider open space would continue west of Lippard. If diagonal parking were not feasible, the open space corridor would extend to Diamond. The reduced lanes and diagonal parking could have a traffic-calming effect on this artery.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response PD-3

This comment addresses transportation improvements beyond those identified in the *2010 Community Plan*, rather than the DEIR. While this improvement was not considered in this DEIR, future improvements in the plan area could occur at a later date. Any future improvement would be subject to subsequent environmental review. This comment will be available to the Planning Commission as it deliberates on the merits and contents of the *2010 Community Plan*.

Comment PD-4: *The Community Plan should include additional transportation improvements at the Monterey Boulevard/Circular Avenue/I-280 off-ramp intersection.*

“Additional Improvements

“In addition to the intersection analyzed, the Department recommends analyzing and proposing improvements to the Monterey Avenue/Circular Avenue/I-280 off-ramp intersection in a future phase of the Glen Park Community Plan that might improve transit and vehicular operations within the area.” (*Gary Arnold, Caltrans, Letter, June 7, 2011*)

Response PD-4

The concern regarding the Monterey Boulevard/Circular Avenue/I-280 off-ramp intersection is noted and SFMTA will consult and inform the California Department of Transportation (Caltrans) on the monitoring of this intersection over time. The DEIR, on pp. III.E-40 and III.E-41 and pp. III.E-81 and III.E-82, acknowledges that the potential infill development and cumulative conditions would cause the LOS at this intersection during the AM peak hour to deteriorate from LOS D to LOS E, and identifies a mitigation measure (M-TR-2A, Monterey Boulevard/Circular Avenue/I-280 Ramps Intersection Signal Timing Modifications, p. III.E-41) calling for SFMTA to monitor operations at this intersection and, in relation to the project, potentially extend the cycle to mitigate the impacts to a less-than-significant level.

Prior to the preparation of the DEIR, the signalization at this intersection was improved with the addition of a southbound left turn phase, which reduced the queuing of southbound vehicles on Circular Avenue waiting to turn onto the northbound I-280 on-ramp. Currently the intersection operates at LOS D in the AM and PM peak hours, with total peak-hour traffic volumes of about 2,600 to 2,700 vehicles per hour. The major problem remaining today is the oblique angle at which the I-280 ramps intersect with Circular Avenue, which leads to awkward right and left turns to and from the ramps and Circular Avenue north of Monterey Boulevard. In particular, the configuration necessitates wide turns by large vehicles such as the private shuttle buses that access the Glen Park BART Station from the I-280 southbound off-ramp.

Any improvement, such as widening of the right-turn lane, would require modification of the off-ramp structure. SFMTA may, at any time, recommend additional improvements to this intersection, above the signal timing adjustments related to this project; however, any additional improvements would require further environmental review, as appropriate. Caltrans would continue to be informed and consulted on any changes proposed at this intersection.

Comment PD-5: *The Community Plan should include design guidelines.***"AESTHETICS**

"The previous version of the Community Plan included Design Guidelines for in-fill development. These guidelines have been excluded from the current draft of the Plan. We recommend that design guidelines be incorporated in the current Plan.

"Smaller-scale development is more consistent with the existing community feel of the Glen Park village. Any design restrictions that will help preserve or enhance the existing small-scale aesthetic are supported." (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response PD-5

This comment addresses the contents of the *2010 Community Plan*, rather than the DEIR. The commenter's request for design guidelines in the *2010 Community Plan* is acknowledged. Under CEQA, the EIR analyzes the project as proposed and design guidelines are not included in the *2010 Community Plan*. Since this comment does not request information about the DEIR or raise questions regarding its contents or the CEQA process, no further response is necessary. However, this comment will be available to the Planning Commission as it deliberates on the merits and the contents of the *2010 Community Plan*.

Comment PD-6: *The Community Plan should include a goal for utility undergrounding.***"UTILITY UNDERGROUNDING**

"The Community Plan should identify a goal for the entire area in the plan to have any remaining overhead utilities undergrounded, particularly as the major in-fill sites are developed." (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response PD-6

This comment addresses the contents of the *2010 Community Plan*, rather than the DEIR. Since this comment does not request information about the DEIR or raise questions regarding its contents or the CEQA process, no further response is necessary. However, this comment will be available to the Planning Commission as it deliberates on the merits and contents of the *2010 Community Plan*.

Comment PD-7: *The Community Plan should include the creation of a new zoning district for areas near freeway access and some family housing.*

“I hope you will accept this public comment for Glen Park Draft EIR. Any new zoning in Glen Park, a special commercial/residential transit area, should have a new ZONE description to signify an area close to Freeway access. This will allow future building to continue a 1 car parking space per unit built.

“It is imperative to keep this as a minimum so the business district can survive and continue to be an asset to the community at large.

“One more thing, can we please have some family housing. (3bds or more)” (*Ric Lopez, Resident, E-mail, June 13, 2011*)

Response PD-7

The comments regarding creation of a zoning designation close to freeway access and the inclusion of family housing are acknowledged. The DEIR is intended to evaluate the potential physical environmental effects of the project that is proposed - in this case, the *2010 Community Plan*. Alternative proposals are explored and discussed (see Chapter V), when those proposals may substantially reduce impacts identified for the proposed project. Since the commenter’s suggestions would not substantially reduce an environmental impact, the comments relate to the merits or definition of the project and do not address the adequacy of the DEIR. Accordingly, no further response is necessary. However, these comments will be available to the Planning Commission as it deliberates on the merits, contents, and means to implement the *2010 Community Plan*.

LAND USE

Comment LU-1: *The rezoning under the Glen Park NCT district could result in commercial development on Joost Avenue.*

“My comment is a general comment regarding commercial development on Joost Avenue under the new neighborhood commercial transit (NCT) zoning. While the southern side of the first block of Joost Avenue up to the intersection with Lippard Street is currently zoned commercial, the actual usage is predominantly residential. The southern side of the street is zoned commercial where lots front both Joost Avenue and Monterey Blvd; however, existing commercial frontage is on Monterey Blvd. The Community Plan rezoning may promote in-fill development and the replacement of the current residential units on Joost Ave with commercial

developments and storefronts. The expansion of commercial development on this residential street could have significant impacts on the aesthetic character of Joost Avenue.

“Spreading commercial development onto previously residential streets also has a potential to dissipate the positive effect of a concentrated commercial village. Joost Avenue should not be transformed from a quiet residential street into a mixed-use block with minimal controls on the types of commercial uses present. The fragile residential quality of this block of Joost Avenue has recently been reinforced by the structural and aesthetic improvements of some of the housing stock. The introduction of commercial storefronts could have negative impacts on the aesthetic and residential character of the street. The EIR should include design guidelines in the form of mitigation on the proposed rezoning of existing commercial lots facing Joost to either prevent them from fronting onto Joost or limiting their uses and storefronts to fit with the residential character of the street (i.e., low traffic professional businesses such as real estate or architectural design offices).” (*Tania Treis, Resident, Letter, June 13, 2011*)

Response LU-1

The commenter is concerned about additional commercial development on Joost Avenue that could result from the implementation of the *2010 Community Plan*. The *2010 Community Plan* would introduce a new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District, which would apply to parcels along Diamond Street, Chenery Street, Joost Avenue, and Wilder Street currently zoned NC-2 (Small-Scale Neighborhood Commercial). The current NC-2 zoning allows public/institutional uses up to 9,999 gsf; commercial uses over 10,000 gsf; and residential uses at a density of one unit per 800 gsf of lot area. In addition, this district is designed to preserve small-scale shopping districts that provide goods and services to surrounding neighborhoods. The Glen Park NCT District rezoning would permit changes such as modifications to density controls, increased heights, setbacks, façade treatments, and minimization of curb cuts. The DEIR assumes that the rezoning of these sites would not result in a change of land use from residential to commercial. It is anticipated that the change in land use controls would not be a substantial enough incentive to prompt such a change in development. Furthermore, the *2010 Community Plan* encourages commercial uses on Diamond Street and Chenery Street as identified in Policy 1.1. This policy identifies these streets as the commercial core of Glen Park and recognizes the need to concentrate commercial uses and retail activity along these streets. Should the parcels on Joost Avenue be proposed

for development as commercial uses in the future, development would need to be consistent with the design policies in the *2010 Community Plan* and the policies of the Urban Design Element of the General Plan. Both these plans stress integration of proposed buildings with existing buildings, protection of visual relationships and transitions, and maintenance of the streetscape. For further information on design guidelines in the *2010 Community Plan*, please refer to Response PD-5, p. C&R-36.

AESTHETICS

Comment AE-1: *Implementation of the 2010 Community Plan could result in negative visual impacts at the infill sites.*

"Good afternoon. My name's Sally Ross. I live at 201 Joost Avenue. Thank you for the opportunity to address you.

"I was impressed with the draft EIR when it stated that the new development would be appropriately scaled and designed to consider the established patterns of the community. And it went on to establish patterns within the historic survey and so forth, very nicely presented.

"I am a little taken aback by their then offered proxy of the sort of buildings that might take -- might be placed on the infill development, both on the BART parking lot and on the Bosworth and Diamond Street area. Both of these are looking pretty large. And, obviously, they just drew blocks in; they're not building plans. But they do seem rather intimidating, especially the NCT transit rezoned areas of the BART parking lot, which is not really part of this but it's considered throughout, is the -- would allow any building to be some 25 feet taller than its neighbors. Most of the existing Glen Park village is only built to a standard -- well, it's built to a standard height limit of 40 feet; and the buildings there are less than 45 feet." (*Sally Ross, Resident, Public Hearing, June 2, 2011*)

"Increasing the height limit has not received support and has generated some very angry discussions during those meetings. But it sounds from your Public Notice letter that it is still being considered.

"Increasing the height limit to 45 feet would create an undesirable atmosphere in our neighborhood. And the phrase "set-back" is a feeble attempt to spin the effort.

"I trust you will make every effort to preserve our neighborhood character by keeping the height limit to 40 feet or less." (*Diane Grant, Resident, Letter, June 7, 2011*)

“Visual Impacts of New Height Limits

“The proposed Land Use and Planning Code Amendments, summarized on DEIR Table II-1, p. II-3 and DEIR p. 11-13 include increasing the 40-X height limit by 5 feet to allow for increased ceiling heights on ground floors in the new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District. DEIR Section III.C, Aesthetics, presents visual simulations (mass and bulk), an analysis of the effects of the new height limit, pp. III.C-7 to II.C-17, and concludes that the impacts on visual character would be “less than significant.”

“Glen Park is a small-scale neighborhood. Most buildings in the village core are approximately 30 feet or less in height. The EIR should address the effects of the proposed zoning in comparison with existing building heights. It is our view that the proposed zoning change could have a potentially significant impact on visual character. To minimize potentially significant visual impacts, we recommend that the Final EIR include mitigation measures that define design guidelines to reduce aesthetic impacts of new buildings taller than the existing pattern in Glen Park. These design guidelines should include, but may not be limited to, setbacks above the second floor of new buildings so that the bulk of buildings above 25 feet is reduced as viewed from the street.

“The construction of buildings that take maximum advantage of height limits on available in-fill lots could also have significant aesthetic impacts on neighboring residential lots whose yards or homes could abut essentially a 45-foot tall wall. We also recommend that the aforementioned design guidelines take into account the bulk of 45 foot structures on other frontages and limit the visual impacts through additional design guidelines.

“We recognize that the 5-foot incremental increase in height in the NCT zoning is intended to improve retail viability and pedestrian access to street-level businesses. The sidewalks in Glen Park’s business district are currently insufficient for pedestrian access to businesses. We recommend that the design guidelines for new in-fill development also include street-level setbacks on Diamond Street and Bosworth Street so that new sidewalks would be at least 12 feet wide to improve both the appearance and the functionality of the space in front of new buildings.”

“Visual Impacts of BART Lot Development

“Section III.C includes an analysis of a hypothetical “worst-case scenario” of up to 65 foot tall development on the BART lot as shown in Figures II.C-5 and III.C-6. Given that development of up to 45 feet could potentially have a significant visual impact, we believe that the impact of a 65 foot building on the BART lot would not be “less than significant,” and we recommend that the DEIR Chapter V. analyze explicitly the impacts of a 45 foot high building on that site.

“Given that the new zoning (Glen Park NCT) height limit is proposed at 45 feet, the EIR should consider a 45 foot alternative for the BART lot. While EIR Alternatives B and C include reduced development alternatives, the alternatives do not address height limits for the BART site. The

DEIR does not include an alternative that considers the impacts of a 45-foot high building on the BART site

“Consistent with previous comments regarding design guidelines for in-fill development taller than the existing buildings, the DEIR should identify mitigation with design guidelines for the BART site to minimize visual impacts of bulk or box-type development that would be out of character with the existing development and feel of the village core. Setbacks on Bosworth Street should also insure at least 12-foot wide sidewalks.” (*Nicholas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response AE-1

These comments express concern over the height limits being analyzed in the DEIR and the visual effects that could result from the scale of development proposed at the infill sites. The DEIR provides a program-level analysis of the environmental impacts associated with potential development of two infill sites and the broader plan area to present a conservative analysis of the maximum buildout potential. As stated throughout the DEIR, implementation of the *2010 Community Plan* would introduce a new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District, which would apply to parcels along Diamond Street, Chenery Street, Joost Avenue, and Wilder Street currently zoned NC-2 (Small-Scale Neighborhood Commercial). The Glen Park NCT District rezoning would permit new physical changes such as modifications to density controls, increased heights, setbacks, façade treatments, and minimization of curb cuts. While most of the plan area would retain the prevailing height limit of 40-X, the height limit would be increased to 45 feet in areas rezoned to Glen Park NCT to encourage active ground-floor uses. It is anticipated that the additional height would be added to the ground floor and not allow for another floor of development. An increase of 5 feet would allow for storefronts with more space.

As mentioned earlier in the Plan Refinements section, p. C&R-5, the height district refinements would reduce the maximum height of new construction along portions of Wilder Street, Diamond Street, and Chenery Street in the Glen Park NCT district from a range of 40 to 45 feet to a range of 30 to 35 feet. However, for the purpose of this EIR, a height limit of 45 feet in areas rezoned to Glen Park NCT is still being analyzed to

present a conservative estimate of impacts. Thus, any analysis pertaining to height limits would remain the same in the DEIR and would not need to be modified. Minor edits have been made to the Project Description and Land Use section to clarify that the EIR would still analyze a height limit of 45 feet.

As stated in the DEIR Project Description, p. II-15, the Diamond Street/Bosworth Street infill site and the BART parking lot were recognized in the *2003 Community Plan Summary* as the two sites most likely to be developed in the near term. It is important to note that the *2010 Community Plan* does *not* propose rezoning the BART parking lot site; it is explained on p. II-35 that subsequent environmental review would be needed for this site and, for the time being, the *2010 Community Plan* proposes that the site retain its existing Public zoning. Nevertheless, for analytical purposes, the site is studied as if it were proposed for rezoning to investigate how the Glen Park commercial core would be altered with more intense development at this identified infill site. By presenting the potential physical impacts associated with development of these two infill sites, the DEIR discusses potential foreseeable environmental impacts; however, the *2010 Community Plan* would not result in development of these sites. The maximum development potential is used for the environmental analysis to provide a conservative estimate of impacts that could occur. The DEIR does not necessarily assume that this is a feasible or desirable development scenario nor should this scenario convey an endorsement of a particular development strategy or design by the Planning Department or any other department or agency of the City and County of San Francisco.

At the Diamond Street/Bosworth Street infill site, as stated in the Aesthetics section, p. III.C-14, the existing street trees would help reduce the bulk and mass along Bosworth Street; however, the mass and bulk of the eastern elevation facing Diamond Street would be highly visible and portions of the ridgeline would be obstructed by the potential infill development. The height, bulk, and mass of the potential infill development would be greater than those of existing buildings, but that development would need to be consistent with the design policies in the *2010 Community Plan* and the

policies of the Urban Design Element of the General Plan. Both these plans stress integration of proposed buildings with existing buildings, protection of visual relationships and transitions, and maintenance of the streetscape. As future development applications are considered in the new NCT zoning district, adherence to these design policies would reduce potential visual impacts associated with the new development and would reduce the visual differences with the adjacent structures. Thus, development associated with the implementation of the *2010 Community Plan* would not substantially degrade the visual character or quality of the site and its surrounding, to the degree that a significant impact under CEQA would occur and mitigation measures, such as design guidelines, would not be needed.

Under the *2010 Community Plan*, the BART parking lot site would retain its existing zoning and the existing 40-foot height limit. However, to present a future picture, the EIR assumes that the site potentially could be rezoned to a 65-X Height and Bulk District. As stated on in the Aesthetics section, p. III.C-16 of the DEIR, although a new building placed on the BART parking lot could be substantially taller and of greater bulk and mass, the existing street trees would help reduce the bulk and mass. Additionally, the parking lot site has a lower elevation than the surrounding area and, thus, any building constructed to a height of 65 feet on the lower portion of site would not substantially exceed the heights of surrounding structures. Furthermore, compliance with the design guidelines and policies of the *2010 Community Plan* and the General Plan's Urban Design Element would ensure that visual impacts would be less than significant. For further information on design guidelines in the *2010 Community Plan*, please refer to Response PD-5, p. C&R-36. Alternatives are only required to feasibly attain most of the basic objectives of a project, while substantially reducing any significant impacts. Since this is not a significant impact, it is not necessary to consider an alternative addressing aesthetic effects. As such, there is no need for an additional alternative that analyzes a 45-foot height limit on the BART parking lot site.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Comment CP-1: *The DEIR should further clarify M-CP-1 and the conclusion that the entire BART Station, including the exterior plazas, has historic merit should be reconsidered.*

“The HPC concurs with the findings on the properties identified as eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources, and as City Landmarks.

“The HPC suggests further clarification for M-CP-1 (Page III.D-30) to ensure review for SOI (Secretary of the Interior's) Standard compliance be conducted by Preservation Staff of the Planning Department.” (*Charles Edwin Chase, Historic Preservation Commission, Letter, May 24, 2011*)

“The draft EIR concludes that the Glen Park BART Station is likely eligible for listing on the California Register of Historical Resources under Criterion 3 - Design/Construction. This conclusion is based on a December 21, 2010 Historic Resources Evaluation, Draft Glen Park Community Plan, San Francisco, California prepared by Carey & Co., Inc. Based on this determination, the draft EIR identifies several potentially significant environmental effects that would result from implementation of the 2010 Community Plan, and proposes mitigation measures that lessen these potential impacts to less-than significant. As with the draft EIR's treatment of potential impacts to BART's transit service, BART believes the analysis and conclusion in the draft EIR concerning potential impacts to BART's Glen Park Station are supported by substantial evidence.

“However, BART does not necessarily agree that the entirety of the Glen Park Station is eligible for listing on the California Register as concluded in the Carey & Co. evaluation. While BART recognizes that some individual components of the BART station may have some architectural significance, and while BART is committed to preserving the historic resources within its ownership and control, the Carey & Co. evaluations conclusion that the entire Glen Park Station, including the plaza, is an historic resource seems overly broad. BART reserves the right to undertake a future historic resources evaluation of the Glen Park Station and, depending on the results of such evaluation, reach a different determination regarding the Glen Park Station's eligibility for listing on the California Register, when and if BART undertakes any independent projects involving the Glen Park Station.” (*Jeffery Ordway, BART, Letter, June 13, 2011*)

“Historic Resources

“DEIR Section III.D. Cultural and Paleontological Resources, reports that the Glen Park BART Station is recognized for its architectural significance and appears to be eligible for listing on the California Register of Historic Places and as a City Landmark (DEIR p. III.D-12). The proposed Community Plan Transportation Improvements include options and variants that would require parts of the BART Station to be modified in order for it to serve its purposes as a rail station at an intermodal transit point. The DEIR further concludes that the potential J-Church

connections and the bus loop would, in a conservative analysis, have a significant adverse effect on this historic resource.

“The DEIR lists elements of the station and the plaza as contributory to qualifications for the California Register (DEIR Section III.D-12). The circular plaza sitting area at the corner of Bosworth and Diamond Streets, labeled as a ‘courtyard’ in the EIR, is identified as one of the character defining features of the station’s architecture and history.

“The record of development of the Glen Park Station shows that the circular plaza at Diamond and Bosworth was designed and completed after the rest of the station. The design and materials differ from the features of the main elements of the station. Therefore, the evaluation of the BART station in Section III.D should be revised to state that the circular plaza is not one of its character-defining features. Attached to this letter are plans and records that document the status of the circular plaza.

“We note that the Widening of Diamond Street - Variant, DEIR p. 11-27, shown in Figure 11-7, would require reconfiguration of part of the BART plaza. The DEIR does not appear to address whether the Variant would have an adverse effect on the defining features of the BART station. On the basis of the documents noted above, the EIR should conclude that the alteration of the plaza area to implement the Variant or any other changes to the plaza, would not adversely affect a character-defining feature of the BART station as an historic resource, and the BART station would retain its integrity as a resource eligible for the California Register

“Overall, we recommend that the EIR address the necessity of finding a balance between the maintenance or enhancement of the functionality of the BART Station and the preservation of its defining design features. Because the BART station is a large site with a number of character-defining features, the EIR should discuss more completely how future changes, required to improve the functionality of the transit system in general, and the Glen Park Station in particular, would be evaluated in terms of historic resources. Changes in one part of the station could result in a conclusion that the remainder of the station, with its architectural design and materials, still possess sufficient integrity such that the site as a whole would maintain its eligibility for the California Register of Historic Resources.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response CP-1

The comment recommends modifications to Mitigation Measure M-CP-1 to explicitly recognize the role of Preservation staff within the City Planning Department to review matters involving compliance with the Secretary of Interior’s Standards. In response to this comment, the text changes below have been made to p. III.D-30 in Section III.D, Cultural and Paleontological Resources, of the DEIR, the second full sentence of Mitigation Measure M-CP-1:

Prepared materials will be submitted to the Planning Department for review by staff who meet the Secretary of Interior's Professional Qualification Standards. ~~The Planning Department~~ Such staff will review and the Historic Preservation Commission shall approve the project for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The comment also expresses support for the findings on the properties identified as eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources (California Register), and as City Landmarks, as identified in the Glen Park Community Plan Draft EIR. Since this comment raises no other points regarding the DEIR or its adequacy, no further response is necessary.

The evaluation of the Glen Park BART Station for National and California Register eligibility followed the prescribed methodologies for evaluating properties for their historic significance. For a property to qualify for the California Register, it must meet one of four criteria for listing by being associated with an important historic context and it must retain historic integrity of those features necessary to convey its significance. The property also must be classified as a district, site, building, structure, or object for inclusion in the California Register. A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.⁸ Although not over 45 years old, the BART Station is identified for its architectural significance. The Glen Park BART Station was classified as a building that appears eligible for listing in the California Register under Criterion 3 (Design/Construction) and was found to retain several character-defining features that convey its historic significance. These features, or "individual components," would not be singled out for separate evaluations apart from how they contribute to the historic significance of the building. The design and execution of the Glen Park BART Station must be looked at and evaluated in its totality.

⁸ <http://www.parks.ca.gov/pages/1069/files/Technical%20Assistance%20Bulletin%206%202011%20Update.pdf>. Accessed on September 28, 2011.

Properties may also be classified as structures or objects. Structures are properties whose purpose is usually not related to creating human shelter. Examples include bridges, bandstands/gazebos, silos/grain elevators, lighthouses, and dams. Objects are primarily artistic in nature, small scale, and simply constructed. Examples include fountains, statuary, street lamps/lights, and fixed furniture. Related individual components of a building are not usually classified as either structures or objects and are not evaluated separately.

The entirety of the BART Station appears eligible for listing in the California Register, as stated above. However, the Glen Park BART power station, which stands on a parcel a block north of the BART Station between Arlington Street and Wilder Street and was designed by the same team and employs some similar design forms, does not appear to possess the same architectural merit as the Glen Park BART Station. Therefore, the power station does not appear to be individually-eligible for the California Register, for the National Register, or as a City Landmark as a structure less than 45 years old.

The comment notes that the circular plaza, or courtyard, is identified as “one of the character defining features of the station’s architecture and history,” but points out that the “circular plaza at Diamond and Bosworth was designed and completed after the rest of the station... Therefore, the evaluation of the BART Station in Section III.D should be reviewed to state that the circular plaza is not one of its character defining features.” Three drawings were submitted in support of this comment. The drawing sheets dated December 1, 1966 show a plaza design proposal that is rectangular in nature. The drawing dated May 18, 1970 shows plans for a circular plaza element labeled “plaza circle.” Also submitted was a birds-eye, aerial photograph with the caption “Station shell structure for Glen Park Station. Contract 1M0043 – Glen Park Station Shell” with a handwritten date of July 1970.

The evaluation of the Glen Park BART Station correctly includes the identification of the present circular plaza design as a character-defining feature for the following reasons.

The process of designing and constructing the BART Station took place over a number of years. For a project of this type, there are often design changes made, sometimes even during construction. The drawing from May 1970 shows that the design of the plaza as actually constructed changed from the earlier 1966 design proposal. However, as shown throughout the different stages of the plan, a plaza was always intended to be included as a part of the BART Station. Thus, rather than the circular plaza being “designed and constructed after the rest of the station,” the plaza was designed and constructed *as part of* the overall project. The birds-eye photograph clearly shows that the 1966 design proposal was never constructed; however, plans dated May 18, 1970 show that the circular plaza design was drafted before completion of the entire station complex. The final completed project, which was concluded after the July 1970 photograph, included the circular plaza and is what was evaluated in the EIR. Therefore, the circular plaza, as part of the final completed BART Station, is appropriately regarded as a character-defining feature of the station. The Glen Park BART Station is confirmed to appear eligible for the California Register under Criterion 3.

As noted in the comment, the Widening of Diamond Street Variant would include modifications to the BART Station plaza, including alterations to the exterior plazas. The exterior plazas, and in particular the circular courtyard, were identified as character-defining features. Any alteration to the BART Station plazas and circular courtyard could potentially result in a significant impact; however, this impact would be mitigated through implementation of Mitigation Measures M-CP-1, M-CP-2A, M-CP-2B, and M-CP-2C, as identified in Section III.D, Cultural Resources, pp. III.D-34 and III.D-35. In order to clarify that the Widening of Diamond Street Variant would contribute to the already identified significant impact, Impact CP-1, p. III.D-26 of the DEIR, and would be reduced to a less-than-significant level by the already identified mitigation measures, the DEIR has been revised as indicated below. As a result of this text addition, the Proposed Muni Metro J-Church Pedestrian Bridge Improvement analysis on p. III.D-29, last paragraph, has been shifted to follow M-CP-1, p. III.D-30. The text pertaining to this

improvement remains the same, except for minor revisions required to shift its location to follow the new Widening of Diamond Street Variant discussion.

Note that the DEIR revisions shown below include the previously identified revisions to Mitigation Measures M-CP-1 in order to provide a comprehensive description of the modifications to that mitigation measure.

In addition to the Widening of Diamond Street Variant, the BART Station Plaza Improvements project component would also include modifications to the exterior plazas of the BART Station and, therefore, could potentially contribute to the already identified significant impact under Impact CP-1. This potential impact would be mitigated through implementation of Mitigation Measures M-CP-1, M-CP-2A, M-CP-2B, and M-CP-2C, as identified in Section III.D, Cultural Resources, pp. III.D-34 and III.D-35, and described in the text below.

Page III.D-26, 2nd paragraph from the bottom of the page:

CP-1 Operation and design associated with the 2010 Community Plan's Diamond Street widening variant, pedestrian connectivity improvements~~-access~~, BART Station plaza improvements, and bus loop improvement at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. (Less than Significant with Mitigation)

Page III.D-29, paragraph 3:

The 2010 Community Plan proposes transportation improvements that could affect the physical characteristics of the BART Station that justify its eligibility for inclusion in the California Register. As described further below, ~~these plan~~ transportation improvements include: ~~s~~ the Diamond Street widening variant; the two options for changes to the BART Station in order to enhance pedestrian access by improving the connectivity between the BART Station station and the Muni Metro J-Church stop on San Jose Avenue; the BART Station plaza improvements; and the bus loop improvement at the BART Station.

Widening of Diamond Street Variant. The proposed Diamond Street widening variant would consist of widening Diamond Street with a northbound right-turn lane. If this variant were implemented, the Glen Park BART Station plaza, including portions of the exterior plazas, would be modified to include a sloped landscaped area, a ramp accessible to persons with disabilities, an elevator connecting the street level to the plaza level, stairs down to plaza from the sidewalk, bench seating, bicycle lockers, bicycle parking, a bicycle ramp, and ticket machines. These modifications would alter portions of the exterior plazas of the BART Station, which are character-defining features. Detailed drawings have not been prepared for the proposed project. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the Diamond Street Widening variant would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Diamond Street widening variant would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described below. (As discussed on pp. III.D-30 through III.D-31, this mitigation measure also addresses significant impacts resulting from construction of the Muni Metro J-Church pedestrian connectivity improvements, the BART Station plaza improvements, and the bus loop improvement.)

~~*Proposed Muni Metro J Church Pedestrian Bridge Improvement.* The first pedestrian access option is to rebuild the existing pedestrian bridge and to construct an elevator between Diamond Street and the BART Station entry plaza, which would alter the BART Station. Rebuilding the existing pedestrian bridge would not directly impact the station or have a significant impact on its setting. The proposed pedestrian bridge would replace the existing structure, which is not readily visible from the station due to a row of trees lining the southwest corner of the parcel containing the station. Consequently, the reconstructed bridge would have no impact on the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket~~

~~machines. Detailed drawings have not been prepared for the proposed elevator, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the elevator would result in a significant impact, because it could materially impair those physical characteristics of the station that justify the BART Station's eligibility for inclusion in the California Register.~~

~~This significant impact of the elevator associated with the proposed Muni Metro J Church Pedestrian Bridge improvement on the BART Station would be reduced to a less than significant level through implementation of Mitigation Measure M-CP-1, as described below. (As discussed on page III.D-31, this mitigation measure also addresses significant impacts resulting from construction of the bus loop improvement.)~~

M-CP-1 Verification of Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. San Francisco Municipal Transportation Agency (SFMTA), in cooperation with BART and any other agency that may have jurisdiction, will prepare materials describing and depicting the widening of Diamond Street variant, pedestrian connectivity improvements, BART Station plaza improvements, and bus loop improvement at the BART Station, including but not limited to plans, drawings, and photographs of existing conditions. Prepared materials will be submitted to the Planning Department for review by staff who meet the Secretary of Interior's Professional Qualification Standards. ~~The Planning Department~~ Such staff will review and the Historic Preservation Commission shall approve the project for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. If any aspect of the design of the widening of Diamond Street variant, pedestrian bridge connectivity improvements, BART Station plaza improvements, and/or bus loop improvement at the BART Station is determined to be inconsistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*,

SFMTA, BART, and any other agency that may have jurisdiction shall pursue and implement a redesign of those elements, consistent with the goals and objectives of the project, such that consistency with the standards is achieved.

Proposed Muni Metro J-Church Pedestrian Bridge Improvement. The first pedestrian access option is to rebuild the existing pedestrian bridge and to construct an elevator between Diamond Street and the BART Station plaza, which would alter the BART Station. Rebuilding the existing pedestrian bridge would not directly impact the station or have a significant impact on its setting. The proposed pedestrian bridge would replace the existing structure, which is not readily visible from the station due to a row of trees lining the southwest corner of the parcel containing the station. Consequently, the reconstructed bridge would have no impact on the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Detailed drawings have not been prepared for the proposed elevator, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the elevator would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the elevator associated with the proposed Muni Metro J-Church Pedestrian Bridge Improvement on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p.III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties.

Muni Metro J-Church At-Grade Crossing Variant. The second pedestrian access option is to construct a new pedestrian ramp between the Muni Metro J-Church platform and the BART Station at the station's south, or rear, elevation. Detailed drawings have not been prepared for the proposed pedestrian ramp, so it is not known if its design or scale would

be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of this at-grade crossing variant would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the pedestrian ramp associated with the Muni Metro J-Church At-Grade Crossing Variant on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*.

BART Station Plaza Improvements. The redesign of the BART Station plaza concept would consist of removing walls and fences, expanding at-grade access, and linking Muni passenger areas to improve pedestrian access in the BART Station plaza. Detailed drawings have not been prepared for the proposed redesign of the BART Station plaza, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the BART Station plaza improvements would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact associated with the redesign of the BART Station plaza would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*.

BART Station Bus Loop Improvement. The proposed BART Station Bus Loop Improvement would consist of a bus loop around the Glen Park BART Station with a new concourse-level entry to the station at its south elevation. This improvement would construct a concourse-level entry at

the Glen Park BART Station's south elevation and a walk-through bridge through the station to the north-end plaza to reconfigure the staircase at the north plaza. These modifications would alter the station's character-defining features, including its interior space and the exterior plazas. Specifically, the bus loop improvement could significantly impact the design and character of the interior space, including, but not limited to the relationship of the roof form, the interior tile mosaic, and the fenestration. Detailed drawings have not been prepared for the proposed project. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the bus loop improvement ~~it~~ would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed BART Station Bus Loop around the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*.

No Bus Loop Variant. The No Bus Loop Variant would consolidate existing private vehicle drop-off areas on Bosworth Street and on Diamond Street. This variant would not directly impact the BART Station. It would not materially impair those physical characteristics, such as the exterior plazas, of the Glen Park BART Station that justify its eligibility for inclusion in the California Register. The impact of the No Bus Loop Variant would therefore be considered less than significant.

Page III.D-32, paragraph 2:

CP-2 *Construction activities resulting from the Diamond Street widening variant, pedestrian connectivity improvements—~~access~~, BART Station plaza improvements, and bus loop improvements at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. (Less than Significant with Mitigation)*

Page III.D-33, paragraph 4:

Transportation Improvements. Construction activities at the BART Station would be associated with the Diamond Street widening variant, Muni Metro J Church pedestrian connectivity improvements bridge, BART Station plaza improvements, and the bus loop improvement.

Widening of Diamond Street Variant. The proposed Diamond Street widening variant would consist of widening Diamond Street with a northbound right-turn lane. Inadvertent damage to the BART Station plaza could occur during construction due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction altering the BART Station plaza would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Diamond Street widening variant would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties, together with Mitigation Measures M-CP-2A through M-CP-2C, described below.

~~Proposed Muni Metro J Church Pedestrian Bridge Improvement.~~ Construction activities associated with the proposed bridge would occur towards the southwest corner of the parcel containing the station, far enough way to not significantly impact the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Inadvertent damage to the BART Station could occur during the construction of the elevator due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the elevator would result in a potentially significant impact, because it could

~~materially impair those physical characteristics of the station that justify the BART Station's eligibility for inclusion in the California Register.~~

~~This significant impact of the proposed Muni Metro J Church Pedestrian Bridge elevator on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, together with Mitigation Measures M-CP-2A through M-CP-2C, described below.~~

Page III.D-36, first paragraph:

Proposed Muni Metro J-Church Pedestrian Bridge Improvement. Construction activities associated with the proposed bridge would occur towards the southwest corner of the parcel containing the station, far enough way to not significantly impact the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Inadvertent damage to the BART Station could occur during the construction of the elevator due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the elevator would result in a potentially significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Muni Metro J-Church Pedestrian Bridge elevator on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, together with Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resource during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historical resource ~~and~~ documentation and protection, and Mitigation Measure M-CP-2C

calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

Muni Metro J-Church At-Grade Crossing Variant. Inadvertent damage to the BART Station could occur during the construction of the pedestrian ramp due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the pedestrian ramp would be a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed elevator on the BART Station would be reduced to a less-than-significant level through incorporation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resource during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historical resource ~~and~~ documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

BART Station Plaza Improvements. The redesign of the BART Station plaza would consist of removing walls and fences, expanding at-grade access, and linking Muni passenger areas to improve pedestrian access in the BART Station plaza. Inadvertent damage to the BART Station could occur during construction altering the BART Station plaza due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction altering the BART Station plaza would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that

justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed BART Station Plaza Improvements would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A calls for the protection of historical resource during construction by following a specific plan. Mitigation Measure M-CP-2B calls for historical resource documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

BART Station Bus Loop Improvement. Inadvertent damage to the Glen Park BART Station could occur during the construction of the concourse level entry and the walk-through bridge associated with the proposed BART Station Bus Loop Improvement. The damage could occur due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. This significant impact on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resources during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historic resource ~~and~~ documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

No Bus Loop Variant. The No Bus Loop Variant would consolidate existing private vehicle drop-off areas on Bosworth Street and on Diamond Street.

This variant would not directly impact the BART Station and would have minor construction impact on its exterior plazas. It would not materially impair those physical characteristics, such as the exterior plazas, of the Glen Park BART Station that justify its eligibility for inclusion in the California Register. The impact would therefore be considered less than significant.

Comment CP-2: *The mitigation measure for paleontological resources is inappropriate given the limited potential to uncover important fossils.*

“Paleontological Resources

“The mitigation measure presented on pages III.D-41 seems inconsistent with the analysis and too onerous for the very limited potential for occurrence of fossils, which could unnecessarily add costs to new development. Radiolarians are fairly common in the chert in this region and would likely be out of context in the village. We recommend removal of this mitigation measure.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response CP-2

The commenter requests that Mitigation Measure M-CP-4 be removed from the DEIR. As stated in the DEIR, p. III.D-40, “In the unlikely event that paleontological resources are discovered in the area during construction activities, potential significant impact on paleontological resources could occur.” As such, Mitigation Measure M-CP-4 is needed to reduce potential impacts. However, in response to this comment, the following text change has been made to pp. III.D-40 and III.D-41 in Section III.D, Cultural and Paleontological Resources, of the DEIR to clarify the mitigation measure:

Page III.D-40, last paragraph:

The slope debris in the plan area may contain fossils eroded from the Franciscan rocks, but such fossils would have been transported from their original locations and would lack stratigraphic context and, therefore, would be of limited scientific value. For the same reason, no valuable fossils are likely to occur in the artificial fill. In the unlikely event that paleontological resources are discovered in the area during construction activities extending into previously undisturbed soil or rock, ~~a potential~~ significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-4 would reduce impacts of

the 2010 Community Plan to paleontological resources to a less-than-significant level. This mitigation would apply if excavation in the plan area is expected to extend into previously undisturbed soil or rock.

Page III.D-41, first paragraph:

M-CP-4 Paleontological Resources Monitoring Plan. If excavation in the plan area is expected to extend into previously undisturbed soil or rock, tThe SFMTA, BART, and any other agency that may have jurisdiction shall retain the services of a qualified paleontological consultant having expertise in California paleontology to design and implement a monitoring and mitigation program. The program shall include a description of when and where construction monitoring would be required; emergency discovery procedures; sampling and data recovery procedures; procedures for the preparation, identification, analysis, and curation of fossil specimens and data recovered; preconstruction coordination procedures; and procedures for reporting the results of the monitoring program. If potentially important paleontological resources (fossilized invertebrate, vertebrate, plant, or micro-fossil) are encountered during excavation, work shall cease within 25 feet of the feature, the ERO shall be notified, and the paleontologist shall identify and evaluate the significance of the potential resource, documenting the findings in an advisory memorandum to the ERO...

TRANSPORTATION

Comment TR-1: *The City's capacity utilization significance threshold may not be appropriate for future projects evaluated by BART.*

"The draft EIR uses the City's Transportation Impact Analysis Guidelines for Environmental Review ('SF Guidelines') for purposes of establishing thresholds of significance for impacts on transit services. The SF Guidelines provide that a project will result in an impact on BART service if the project will add riders so as to cause BART trains to exceed 135% capacity utilization threshold during peak hours. The draft EIR then concludes that implementation of the 2010 Community Plan, including the anticipated TOD project on the BART parking lot, would not add sufficient riders to BART to trigger this threshold. BART acknowledges that, as

lead agency for purposes of the 2010 Community Plan, the City has discretion to use the 135% utilization threshold of significance, and that the analysis and conclusion regarding impacts to BART service is supported by substantial evidence.

“BART notes, however, that, while the City has discretion to establish the threshold of significance to be used for its projects, and that the 135% capacity utilization threshold appears to be supported by substantial evidence, BART does not necessarily agree that the 135% capacity utilization is the appropriate threshold of significance for all BART projects, including other BART TOD projects. BART reserves its discretion to utilize different thresholds of significance for future projects, or to establish generally applicable thresholds of significance pursuant to CEQA Guidelines § 15064.7, provided such thresholds are supported by substantial evidence.” (*Jeff Ordway, BART, Letter, June 13, 2011*)

Response TR-1

BART’s statement that it reserves its discretion to utilize different thresholds of significance for transit impacts of future projects, or to establish generally applicable thresholds of significance pursuant to CEQA Guidelines Section 15064.7, provided such thresholds are supported by substantial evidence, is acknowledged. The Planning Department acknowledges that the 135 percent threshold contained in the San Francisco Planning Department’s *Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)* for transportation analysis is based on a threshold to account for seated passengers only. The Planning Department is currently coordinating with BART to potentially update the established capacity utilization thresholds for future environmental review analyses. Nonetheless, ridership and capacity utilization data presented by the City and by BART would not alter the analysis or the less-than-significant impact on BART service identified in the DEIR, pp. III.E-87 and III.E-88.

Comment TR-2: *The DEIR utilizes a conservative trip generation/mode split methodology.*

“Table III.E-6 of the draft EIR sets forth the ‘Person Trip Generation for Plan Area Buildout’ and concludes that the 92 residential units planned for the BART parking lot would result in 920 weekday daily trips, and the 14,913 square feet of retail space would result in 2,238 weekday daily trips. Initially, BART notes that, while it understands the City’s decision to utilize a conservative approach to analysis which assumes the maximum buildout of both the residential and retail components of the BART parking lot, it is highly unlikely that both the residential and retail components will be builtout to the maximum scenario. More importantly, BART

believes the trip generation methodology used in the draft EIR is very conservative, such that it overstates the amount of trips that will result from a TOD project on the BART parking lot. BART's experience with other TOD projects on its property indicates that the City's trip generation methodology may be overstating the number of trips that would be generated by a factor of three. This may result in part from an assumption that the retail component of the TOD project would generate trips at a rate similar to a suburban strip center rather than as an incidental, infill retail service in an established urban area. Similarly, the mode split information presented in Table III.E-7 makes certain assumptions different than BART has made for similar TOD projects. BART believes that residential trips should first be divided between work and non-work before any mode splits are applied. BART typically uses 25/75 percent work/non-work in undertaking this analysis.

"As noted above, we do not question the City's discretion to use the more conservative trip generation and mode split methodology for purposes of assessing impacts. BART notes, however, that it has used and will continue to use different, less conservative methodologies for other TOD projects on its property." (*Jeff Ordway, BART, Letter, June 13, 2011*)

Response TR-2

BART's statement that it has used and will continue to use different, less conservative trip generation and mode split methodologies for other transit oriented development (TOD) projects on its property is acknowledged. The conservative trip generation methodology in the DEIR reflects the City's *SF Guidelines* methodology and analyzes the maximum development potential in the plan area, since the actual development plan is not known. Similarly, and as discussed in the DEIR, conservative estimates regarding trip generation, in the absence of specific information such as the potential mix of residential unit sizes or retention of existing retail uses, were made. As identified in the Project Description, pp. II-17 to II-18, the DEIR acknowledges that it is unlikely that full buildout, as analyzed under the plan, would occur due to many factors including that the BART parking lot site is constrained and might not have enough capacity to support the maximum development potential. Similarly, the DEIR acknowledges that the development mix of residential, retail, and parking would likely be less; however, for the purpose of this EIR, the high range of all uses for the potential development was evaluated.

The City's trip generation rate for retail development is expressed in terms of person trips (150 daily or 14 PM peak hour person trips per 1,000 square feet), not vehicle trips as is more typical for suburban-type development. Automobile person trips, and more specifically vehicle trip rates, vary by Superdistrict and are based on the Citywide Travel Behavior Study, as further discussed below. The *SF Guidelines* retail person trip generation rate is regarded by the Planning Department as applicable for a typical retail development in San Francisco, including for a mixed-use development.

Pursuant to the *SF Guidelines*, the DEIR based mode splits on localized Census tract data for the residential commute patterns and Citywide Travel Behavior Study information for the retail commute patterns. The *SF Guidelines* apply different mode shares for work and non-work related trips (see Appendix E of the *SF Guidelines*). While for any individual development project, this area-wide data could underestimate or overestimate the amount of transit or vehicle use of residents, workers, or visitors, the specific amount or percentage of this difference is uncertain. The City is willing to consider using alternate trip generation, mode split, and trip distribution methodologies or adjustments on a case-by-case basis for projects with uses or circumstances not addressed in the *SF Guidelines*. Any alternate methodology would need to be supported by applicable data and/or comparable development sources for the project location.

Comment TR-3: *The DEIR needs to consider the traffic conditions on Alemany Boulevard and surrounding streets.*

"Alemany Boulevard Conditions

"The DEIR describes traffic conditions at the Bosworth/Lyell intersection, and the Transportation Improvements include a Variant that would signalize that intersection. This improvement appears to be the right solution for that location. However, the DEIR should address morning and evening peak hour westbound traffic back-ups into the eastbound left lane of Alemany at Rousseau (traffic from Silver). The cross-town route and from Alemany to Bosworth Street along Rousseau, Still and Lyell Streets are not adequately addressed in the DEIR. The actual back-ups occur beyond the boundaries of the plan area but are caused by current controls at the intersection of Lyell and Bosworth. There is no discussion of the positive impacts of the proposed roundabout or traffic light on the current back-up to and into Alemany. The new traffic controls at the intersection of Lyell and Bosworth need to be designed to favor

the traffic from Lyell because of the unequal traffic load at that intersection.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response TR-3

The DEIR did examine the operations of both the unsignalized intersections at Bosworth Street/Lyell Street and Still Street/Lyell Street and the signalized intersection at Alemany Boulevard/Lyell Street, the latter being outside the *2010 Community Plan* boundary. The intersection of Rousseau Street with Alemany Boulevard noted by the commenter is an uncontrolled intersection located approximately 1,000 feet from the Bosworth Street/Lyell Street intersection and outside the *2010 Community Plan* boundary. There is a left-turn vehicle and bicycle lane on Alemany Boulevard onto Rousseau Street, which is one-way northbound street that becomes Still Street before ending at Lyell Street. The comment mentions traffic back-ups into the eastbound left lane of Alemany Boulevard at Rousseau Street, which are likely the result of left-turn demand occasionally exceeding the two-vehicle storage capacity of the short left-turn bay while waiting for a break in the oncoming Alemany Boulevard traffic.

Observations and analysis performed for the DEIR, pp. III.E-42 through III.E-44, for the *2010 Community Plan* indicate that existing queues from Bosworth Street/Lyell Street extend approximately 400 feet south of the intersection, which operates at LOS F under AM and PM peak hour conditions. These queues do not extend beyond the intersection of Lyell Street and Still Street, and therefore would not influence traffic on Rousseau Street. Furthermore, the Alemany Boulevard/Lyell Street intersection operates at LOS B during the AM and PM peak hours under existing conditions and LOS D under 2030 cumulative conditions, both considered acceptable operating conditions.

While implementation of the *2010 Community Plan* would not substantially alter traffic patterns on Rousseau Street, signalization of Bosworth Street and Lyell Street intersection, as shown on pp. III.E-35 and III.E-77 of the DEIR, would reduce vehicle delays and improve existing operating conditions to LOS B under both AM and PM peak hours and LOS B (AM) and LOS C (PM) with 2030 cumulative traffic. With

signalization, average queues on Lyell Street would be reduced to an estimated 200 to 340 feet, depending upon the peak hour and year (higher queues and traffic occur under future conditions). However, the queues would typically clear on each cycle of the signal rather than standing at approximately 400 feet as currently occurs during peak hours. As a result, both Lyell Street and Still Street south of the plan area would be expected to experience less queuing and delay with the proposed signalization of the Bosworth Street/Lyell Street intersection than without. Nonetheless, the specific concern related to the operation of the left-turn movement from Alemany Boulevard onto Rousseau Street is noted, and has been relayed to SFMTA for future consideration when improvements to or repaving of Alemany Boulevard occur.

Comment TR-4: *The DEIR should evaluate the effects of the Bosworth Street Improvements on local circulation.*

“Bosworth Street Improvements

“The EIR evaluates the effects of the proposed improvements to Bosworth Street at its intersections with Arlington and Lyell Streets (DEIR pp. III.E-52 to III.E-56). This section of Bosworth is also part of a designated Bicycle Route in addition to being heavily used by pedestrians. The EIR should evaluate the impacts of the proposed improvements (roundabout or speed tables) on pedestrian and bicycle safety. It is not clear how bicycle movements through the Arlington intersection would be routed without conflicts with vehicle traffic.

“Bosworth Street/Diamond Street Intersection Improvements

“The proposed changes would affect pedestrian, bicycle and automobile circulation (DEIR pp. III.E-38 to III.E-40). However, there is insufficient analysis of the pedestrian safety impacts of the various alternatives. For example, the EIR does not provide sufficient comparative analysis for the assessment of the impacts on pedestrian safety of a right-turn lane from Diamond Street onto Bosworth Street outside of the BART Station. We recommend further analysis to distinguish between the effects of the variants on pedestrian safety.” (Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011)

Response TR-4

The commenter is correct that Bosworth Street and Lyell Street are part of Bicycle Routes 45 and 55, described in the Transportation and Circulation section, pp. III.E-20 and III.E-21, of the DEIR. The DEIR does address impacts of the proposed transportation

improvements and variants on bicycles and pedestrians, including the roundabout and other traffic calming improvements on pp. III.E-52 through III.E-59. Specifically, the description of the *2010 Community Plan* in the Project Description, p. II-25 of the DEIR, shows a diagram of the potential traffic calming and roundabout improvements and adjacent bicycle lanes, including the separated bicycle path adjacent to the pedestrian sidewalk for the proposed roundabout. Pages III.E-57 through III.E-59 present the evaluation of bicycle safety with the proposed improvements, describe the path of bicycle movements through the roundabout and traffic calming elements, and for the roundabout, further discusses potential conflicts with vehicle movements. As noted in the referenced pages of the DEIR, there would be potential conflicts, and bicyclists would either have to merge to the right of vehicle traffic or use pedestrian pathways and crossings, yielding to motorists. This was identified as a less-than-significant impact on bicycle safety in the DEIR, p. III.E-58, generally due to the low volumes of bicycle traffic on these streets. The specific design of the roundabout would be required to meet state and federal design and safety standards.

The commenter states that there is insufficient analysis of the pedestrian safety impacts of the various alternatives, specifically referencing the right-turn conflict from Diamond Street onto Bosworth Street. The Transportation and Circulation section of the DEIR, pp. III.E-54 through III.E-56, presents the evaluation of pedestrian safety with the proposed improvements. Consistent with the Project Objectives, stated on p. II-4 of the Project Description of the DEIR, pedestrian conflicts with vehicular movements, including the vehicle right-turn from Diamond Street onto Bosworth Street, as well as conflicts throughout the study area, were considered in the design of the proposed transportation improvements. Improvements such as the proposed pedestrian scramble, traffic calming, and elements of other improvements which improve upon or add to existing pedestrian crossings, would improve overall pedestrian conditions in the study area. For example, under the proposed project there would be no substantial impact on pedestrian safety from the proposed right-turn lane from Diamond Street to Bosworth

Street over existing conditions because the proposed scramble phase would eliminate conflicts between pedestrians and right-turning vehicles. Nevertheless, the DEIR discloses less-than-significant pedestrian safety impacts from the project and variant improvements, including the discussion of additional conflicts with transit and roundabout improvements; pedestrian wait and movement analysis; lengths of pedestrian pathways; perception of safety with the removal of parking; and impacts to sidewalks and other pedestrian facilities. For more detail of the background analysis summarized in the DEIR, please see pp.91 through 99 of Section 4.2.3, *Pedestrian Impacts*, of the *Glen Park Community Plan EIR Transportation Impact Study, Final Report*.⁹

Comment TR-5: *The proposed Bus Loop Improvement needs to comply with Caltrans standards and creates circulation impacts.*

“Proposed BART Station Bus Loop Improvements

“Due to the short distance between the entrance into the proposed Bus Loop and the realigned Interstate (I) 280 southbound on-ramp, the improvement may cause confusion to drivers. Please provide appropriate signage to direct drivers.

“The proposed Bus Loop will violate the curb return distance requirement of minimum 400 feet required under the Highway Design Manual Section 504.3(3). As a result, a Design Exemption would be required from the Department.

“The realignment of the southbound I-280 would require extensive work within State right-of-way, we recommend the City to coordinate with the Department as soon as funding and plans are available. A Transportation Management Plan may also be necessary if detours and closures are required.” (*Gary Arnold, Caltrans, Letter, June 7, 2011*)

“BART Station Bus Loop

“The design proposal described in the EIR is difficult to understand. How would non-BART passengers using the bus loop platform access nearby streets? Would the BART fare gates need to be moved or new gates added on the bus platform? How does the bus loop support bus transfers among the 44 and 52 lines and the 23, 35, and 36 lines on the loop? While street crossings would be somewhat reduced, the route through the BART station would add distance

⁹ Atkins, *Glen Park Community Plan EIR Transportation Impact Study, Final Report*. December 3, 2010. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as a part of Case No. 2005.1004!.

for pedestrians to travel to reach the buses, which could contribute to pedestrian congestion. The 44 line is heavily used by transfer passengers.

“While it is noted on p. III.E-54 of the DEIR that pedestrian conflicts could occur at the intersection of the proposed bus loop with Bosworth Street and Diamond Streets, we request further analysis of the impacts of the proposed improvements on pedestrian and bicycle safety versus the benefits of the bus loop, including left turns by buses to the loop from Bosworth and from the loop to Diamond.

“Does the Bosworth Street/Diamond Street intersection Level of Service (LOS) analysis take into account the bus loop operation? If not, it should be considered to ensure that the loop would not decrease LOS.

“We note that the bus loop involves a 14 percent exit grade. Could this grade constitute a design hazard? We recommend that the EIR discuss the operational aspects of this steep grade and any potential design hazards and include mitigation, if appropriate.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

“Another item I would like to address is the possible bus loop that was suggested for moving around behind the BART station itself. I think it's a really good idea.” (*Sally Ross, Resident, Public Hearing, June 2, 2011*)

Response TR-5

Regarding the transportation improvement locations, design, and coordination with Caltrans, the City is aware of the concerns noted in the comment and that additional coordination would be required should the project elements proceed to design. Caltrans was part of the stakeholder group that helped to develop and select the project elements, and such design concerns were voiced at those meetings. Furthermore, concerns about the project design elements, Caltrans property, and required consultations, review, and permits were further discussed in a preliminary meeting held with Caltrans in September 2009. If the proposed bus loop is advanced to project design, SFMTA will contact Caltrans to further coordinate on design, the need for a Design Exception or other approvals (for example, an encroachment permit), the appropriate signage to avoid driver confusion between the Bus Loop entrance and the adjacent I-280 on-ramp entrance from Bosworth Street, and initiate coordination with Caltrans to develop a Transportation Management Plan to address potential impacts during the construction period.

Regarding clarification of the proposed BART Station bus loop design improvement, as described in the Project Description, p. II-32 of the DEIR, “The concourse-level entry would include a walk-through bridge through the BART Station over the down escalator that would provide access from the bus platform to the current BART entry plaza.” The entry walk-through bridge and exit to the BART entry plaza would be separated from the paid area of BART, so that non-BART passengers, while passing through the BART Station to the rear bus loop, would not pass through the BART fare gates or have access to the paid area. Although the walk-through bridge would be at the height of the concourse level, there is no concourse level in the station at this location, effectively separating it from the paid area. Similarly, Muni patrons entering from the bus loop on the south side of the station would proceed through the BART Station using the new bridge. They would then choose to either enter the station paid area through the current fare gates, as no new gates are proposed as part of the project, or go toward the Bosworth Street/Diamond Street intersection. No fare gates are proposed for the south side of the station as a part of project design.

Transfers to and from the 35 Eureka, southbound 36 Teresita, and outbound 23 Monterey would be made on the bus loop platform since each of these lines would be relocated to utilize the proposed bus loop. Transfers to other Muni lines would be made at their stops on Bosworth Street, including those to the inbound 23 Monterey stop relocated to Bosworth Street. Transfers to and from the outbound 44 O’Shaughnessy and the northbound 36 Teresita would continue to cross Bosworth Street, as under existing conditions, but all others would be on the sidewalk adjacent to the BART entry plaza.

The walk-through bridge and associated entry plaza areas would be designed to accommodate planned pedestrian levels (based on existing and planned transit ridership and pedestrian counts in and around the BART Station area). The walking distances for some passengers would increase slightly, as noted by the commenter, e.g., transfers between the outbound 23 Monterey and outbound 44 O’Shaughnessy. On the whole,

however, walking distance would decrease for the majority of passengers transferring to BART. As noted in the comments, the number of street crossings required in order for pedestrians to reach their desired transit service would be reduced.

The bus loop grade of 14 percent would not constitute a design hazard. Muni diesel buses currently operate on grades up to 23 percent. The bus loop exit ramp was designed to meet the feasibility requirement of limiting grades to 12 to 15 percent, and SFMTA would continue to consider this feasibility requirement in more detail if the bus loop is advanced as a project.

Regarding the resulting pedestrian and bicycle safety impacts of the proposed bus loop, p. III.E-20 of the DEIR states that "...cyclists can experience a high level of conflict with other modes while traveling through Glen Park, because they must share the roadway with vehicular traffic and because of the substantial amount of pedestrian traffic in this area." As described on p. III.E-58, the addition of the bus loop would not substantially change this conflict, replacing the conflict of buses pulling to the curb, loading/unloading, and pulling away from the curb with movements that cross the bicyclists' paths, such as the buses entering and exiting the proposed bus loop driveways. In general, the driveway maneuvers would be less disruptive to bicyclists than buses parked at the curb, because at driveways, the bus is required to yield to cyclists, pedestrians, and other vehicles and the movement in general is more predictable to bicyclists. Additionally, when buses are parked at the curb, bicyclists must maneuver around the buses, which can require merging into higher speed vehicular traffic.

Page III.E-54 of the DEIR states that the number of pedestrians that could conflict with buses entering and exiting the bus loop at existing sidewalks (two new conflict areas), including left turn transit movements noted in the comment, would be offset by a greater reduction in pedestrian conflicts with transit vehicles from the relocation of bus stops behind the BART Station and away from vehicle traffic on Diamond Street. The

conflict at the sidewalk entrance and exit of the bus loop was estimated to consist of 9 to 12 buses crossing per hour, which would be required to yield to pedestrians before entering or exiting the driveway. Although drivers on Diamond Street and Bosworth Street are also required to yield to pedestrians, the volume of vehicular traffic turning through the crosswalks is much greater and the potential for pedestrian conflicts is higher than with the bus loop. The design and selection of the project transportation improvement components, including the bus loop, did consider the benefits to pedestrians, consistent with the project objectives. However, the consideration of beneficial effects of projects is not part of CEQA analysis. Rather, per CEQA requirements, EIRs focus on identifying substantial adverse changes to the environment from project elements. Consistent with Section 15043 of the CEQA Guidelines, benefits of projects may be considered when considering the approval of projects with significant environmental impacts, which could be included in the Statement of Overriding Considerations.

The DEIR transportation analysis did include the bus loop operations in its evaluation of intersection LOS operations, including at Bosworth Street and Diamond Street. Although the effects are not individually measurable since it reflects a decrease of four scheduled buses per hour going through the intersection, the overall effects would be positive and would not degrade the LOS at the Diamond Street/Bosworth Street intersection.

As noted on p. II-21 of the DEIR, whether or not the bus loop and other proposed transportation improvements are implemented remains to be determined. Their ultimate implementation depends upon a variety of factors, including decision-makers, funding, and community interests and priorities.

Comment TR-6: *The DEIR should consider other alternatives to the proposed Muni Metro J-Church access.*

“Also, close by that area would be an integration or a better integration and improved access to the J-Church line. And I would like it if the – if the proposal or the demonstrations more clearly

address the interaction of these two items. It seems to me that the diagrams that were given show the progress walking across the area where the bus driveway would go. I'm not sure if that's desirable or not. The way to avoid the bus line seems to be either go over it or go under it. Either way is kind of expensive." (*Sally Ross, Resident, Public Hearing, June 2, 2011*)

"Access to J-Line

"The J-Church access options, DEIR p II-30 and Figure II-8, show circuitous plans. Both plans would appear to conflict with the bus loop plan and the practicality of the plans is questionable. It is difficult to conclude that either would provide a practical improvement to access to the J-Church line, particularly given the physical infrastructure required. We recommend that other alternatives for access to the J-Line be developed and analyzed. We suggest that, as an alternative for analysis, the platforms at the J-Line stop be moved northward along San Jose Avenue so that the ADA compliant ramp from the platform to the BART station is a straight ramp rather than a switch-back ramp." (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response TR-6

The DEIR considered a range of concepts to enhance access between BART and the adjacent Muni Metro J-Church stop, with many of those involving structures at the north end of the BART Station to separate the Muni Metro J-Church pedestrian access from the bus loop and other traffic ways. See the Summary, p. S-56, of the DEIR for a list of pedestrian access improvements that were considered but rejected. None of the structures to the north were found to be feasible due to the difficulty of going over or under the adjacent highway structures while maintaining accessible grades. Pedestrian bridges that went over the off ramp from San Jose Avenue were too high in the air to connect at the BART Station, while those that went under could not clear the I-280 on ramp. Tunnels were generally rejected because of safety security concerns and area constraints.

The topography and highway structures around the BART Station limit the feasibility of many options. The proposed access options described in the Project Description, pp. II-30 and II-31, meet the plan's objective of creating an accessible connection between BART and the Muni Metro J-Church stop. The current Muni Metro J-Church stop is not

accessible to persons with disabilities, and both the proposed and variant pedestrian access improvements would improve upon these conditions.

The proposed and variant pedestrian access improvements would not conflict with the bus loop. The DEIR states on p. II-30, "The pedestrian ramp could be configured to be compatible with other proposed improvements and variants, such as the 'bus loop improvement' or the 'no bus loop variant.'" The bus loop exit would cross the pedestrian path and existing sidewalk on Diamond Street at grade and the entrance (for the variant) would cross the Bosworth Street sidewalk, but buses would be required to yield to pedestrian and bicycle traffic. The DEIR, on p. III.E-55, discusses that the Transportation Improvement Variant accessible improvement with the pathway to the south side of the BART Station would be longer than the improvements proposed with the project and would require the installation of a pedestrian crossing on San Jose Avenue. The DEIR did not investigate relocating the Muni Metro J-Church stop and platform northward along San José Avenue, as suggested in the comment, but this concept could be explored if the project is advanced, although this could result in a longer pedestrian pathway. Steep grades and limited lateral space for the platforms may limit the feasibility of moving the platform north, but moving the platforms northward up the hill could potentially allow a straight ramp connecting the station to the existing pedestrian overpass.

Comment TR-7: *The roundabout design needs to consider traffic at the I-280 southbound on-ramp.*

"Roundabout Variant

"On page 11-25, it is important to note that any queuing on the I-280 Southbound on-ramp will reduce the roundabout's capacity since it would affect other movements that otherwise would not be impacted by signalization." (*Gary Arnold, Caltrans, Letter, June 7, 2011*)

Response TR-7

In preliminary design considerations for the roundabout, SFMTA considered the potential reduction in roundabout capacity due to queuing on I-280 southbound on-

ramp. Given that the I-280 ramp is over 2,000 feet long in this location, the analysis concluded that on-ramp queuing events onto the I-280 that would affect roundabout traffic are rare, and that if they occurred, as under existing conditions, vehicles would choose to wait and indeed reduce the capacity of adjacent roadways, or choose to detour to another route. While signalization at this location would cause fewer intersection movements to be blocked than a roundabout in case of on-ramp traffic spilling back into the intersection, signalization was not considered because the unsignalized intersection operates at a satisfactory level of service and the draft *Community Plan* called for a roundabout to calm traffic at this location.

AIR QUALITY

Comment AQ-1: *The EIR should consider the expansion of corporate shuttle buses in the air quality analysis.*

“The corporate shuttle bus use of the BART Station probably impacts air quality. We recognize that the shuttle buses are part of the existing conditions in the project area; however, the Community Plan may encourage additional use of corporate shuttle buses. We recommend that the existing air impacts from shuttle buses be separately calculated, as well as general impacts from expanded use of shuttle buses in the future.

“Given the baseline air quality in the Glen Park village is poor due to its proximity to Highway 280, Bosworth, and San Jose Avenue, any additional pollutant sources adds to the impacts. The EIR could also consider placing restrictions on the future growth of corporate shuttle bus use and limiting the idling of the buses as part of the mitigation under potential impact AQ-7 on page III.G-34. The measure could also be added to the construction analysis. Limitations on the use and idling of the shuttle buses during construction would also reduce overall air emissions.” (*Nicolas Dewar, The Glen Park Association, Letter, June 13, 2011*)

Response AQ-1

The comment refers to potential air quality impacts that could result from corporate shuttle bus expansion at the Glen Park BART Station. There are no identified plans for shuttle bus expansion at the Glen Park BART Station and such expansion is not called for in the *2010 Community Plan*. As such, this issue is not evaluated in the DEIR. Furthermore, it is not anticipated that implementation of the *2010 Community Plan* would result in a substantial increase in corporate shuttle buses at the BART Station

because the loading and unloading zones at the Glen Park BART Station are not expected to be expanded. Thus, shuttle buses will remain as a part of the existing conditions and will not be analyzed separately.

E. DRAFT EIR REVISIONS

This section contains revisions to the DEIR in response to public comments that have been made on the DEIR, as well as revisions initiated by Planning Department staff. Deletions to the DEIR text are shown with ~~strikethrough~~ and additions are shown with double underline.

TEXT CHANGES IN RESPONSE TO COMMENTS

Page III.D-26, Cultural and Paleontological Resources, 2nd paragraph from the bottom of the page, has been modified as follows:

CP-1 Operation and design associated with the 2010 Community Plan's Diamond Street widening variant, pedestrian connectivity improvements~~access~~, BART Station plaza improvements, and bus loop improvement at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. (Less than Significant with Mitigation)

Page III.D-29, Cultural and Paleontological Resources, paragraph 3, has been modified as follows:

The 2010 Community Plan proposes transportation improvements that could affect the physical characteristics of the BART Station that justify its eligibility for inclusion in the California Register. As described further below, ~~these plan~~ transportation improvements include: the Diamond Street widening variant; the two options for changes to the BART Station in order to enhance pedestrian access by improving the connectivity between the BART Station station and the Muni Metro J-Church stop on San Jose Avenue; the BART Station plaza improvements; and the bus loop improvement at the BART Station.

Widening of Diamond Street Variant. The proposed Diamond Street widening variant would consist of widening Diamond Street with a northbound right-turn lane. If this variant were implemented, the Glen Park BART Station plaza, including portions of the exterior plazas, would be modified to include a sloped landscaped area, a ramp accessible to persons with disabilities, an elevator connecting the street level to the plaza level, stairs down to plaza from the sidewalk, bench seating, bicycle lockers, bicycle parking, a bicycle ramp, and ticket machines. These modifications would alter portions of the exterior plazas of the BART Station, which are character-defining features. Detailed drawings

have not been prepared for the proposed project. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the Diamond Street widening variant would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Diamond Street widening variant would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described below. (As discussed on pp. III.D-30 through III.D-31, this mitigation measure also addresses significant impacts resulting from construction of the Muni Metro J-Church pedestrian connectivity improvements, the BART Station plaza improvements, and the bus loop improvement.)

~~*Proposed Muni Metro J Church Pedestrian Bridge Improvement.* The first pedestrian access option is to rebuild the existing pedestrian bridge and to construct an elevator between Diamond Street and the BART Station entry plaza, which would alter the BART Station. Rebuilding the existing pedestrian bridge would not directly impact the station or have a significant impact on its setting. The proposed pedestrian bridge would replace the existing structure, which is not readily visible from the station due to a row of trees lining the southwest corner of the parcel containing the station. Consequently, the reconstructed bridge would have no impact on the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Detailed drawings have not been prepared for the proposed elevator, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the elevator would result in a significant impact, because it could materially impair those physical characteristics of the station that justify the BART Station's eligibility for inclusion in the California Register.~~

~~This significant impact of the elevator associated with the proposed Muni Metro J-Church Pedestrian Bridge improvement on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP 1, as described below. (As discussed on page III.D 31, this mitigation~~

~~measure also addresses significant impacts resulting from construction of the bus loop improvement.)~~

Page III.D-30, Cultural and Paleontological Resources, paragraph 3, has been modified as follows:

M-CP-1 Verification of Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. San Francisco Municipal Transportation Agency (SFMTA), in cooperation with BART and any other agency that may have jurisdiction, will prepare materials describing and depicting the widening of Diamond Street variant, pedestrian connectivity improvements measures, BART Station plaza improvements, and bus loop improvement at the BART Station, including but not limited to plans, drawings, and photographs of existing conditions. Prepared materials will be submitted to the Planning Department for review by staff who meet the Secretary of Interior's professional qualification standards. ~~The Planning Department~~ Such staff will review and the Historic Preservation Commission shall approve the project for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. If any aspect of the design of the widening of Diamond Street variant, pedestrian bridge connectivity improvements, BART Station plaza improvements, and/or bus loop improvement at the BART Station is determined to be inconsistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, SFMTA, BART, and any other agency that may have jurisdiction shall pursue and implement a redesign of those elements, consistent with the goals and objectives of the project, such that consistency with the standards is achieved.

Proposed Muni Metro J-Church Pedestrian Bridge Improvement. The first pedestrian access option is to rebuild the existing pedestrian bridge and to construct an elevator between Diamond Street and the BART Station plaza, which would alter the BART Station. Rebuilding the existing pedestrian bridge would not directly impact the station or have a significant impact on its setting. The proposed pedestrian bridge would replace the existing structure, which is not readily visible from the station due to a row of trees lining the southwest corner of the

parcel containing the station. Consequently, the reconstructed bridge would have no impact on the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Detailed drawings have not been prepared for the proposed elevator, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the elevator would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the elevator associated with the proposed Muni Metro J-Church Pedestrian Bridge Improvement on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties.

Muni Metro J-Church At-Grade Crossing Variant. The second pedestrian access option is to construct a new pedestrian ramp between the Muni Metro J-Church platform and the BART Station at the station's south, or rear, elevation. Detailed drawings have not been prepared for the proposed pedestrian ramp, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of this at-grade crossing variant would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the pedestrian ramp associated with the Muni Metro J-Church At-Grade Crossing Variant on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties.*

BART Station Plaza Improvements. The redesign of the BART Station plaza concept would consist of removing walls and fences, expanding at-grade access, and linking Muni passenger areas to improve pedestrian access in the BART

Station plaza. Detailed drawings have not been prepared for the proposed redesign of the BART Station plaza, so it is not known if its design or scale would be compatible with the design of the BART Station. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the design and operation of the BART Station plaza improvements would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact associated with the redesign of the BART Station plaza would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties.

BART Station Bus Loop Improvement. The proposed BART Station Bus Loop Improvement would consist of a bus loop around the Glen Park BART Station with a new concourse-level entry to the station at its south elevation. This improvement would construct a concourse-level entry at the Glen Park BART Station's south elevation and a walk-through bridge through the station to the north-end plaza to reconfigure the staircase at the north plaza. These modifications would alter the station's character-defining features, including its interior space and the exterior plazas. Specifically, the bus loop improvement could significantly impact the design and character of the interior space, including, but not limited to the relationship of the roof form, the interior tile mosaic, and the fenestration. Detailed drawings have not been prepared for the proposed project. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes the bus loop improvement ~~it~~ would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed BART Station Bus Loop around the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, described above, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties.*

No Bus Loop Variant. The No Bus Loop Variant would consolidate existing private vehicle drop-off areas on Bosworth Street and on Diamond Street. This variant would not directly impact the BART Station. It would not materially impair those physical characteristics, such as the exterior plazas, of the Glen Park BART Station that justify its eligibility for inclusion in the California Register. The impact of the No Bus Loop Variant would therefore be considered less than significant.

Page III.D-32, Cultural and Paleontological Resources, paragraph 2, has been modified as follows:

CP-2 *Construction activities resulting from the Diamond Street widening variant, pedestrian connectivity improvements ~~access,~~ BART Station plaza improvements, and bus loop improvements at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. (Less than Significant with Mitigation)*

Page III.D-33, Cultural and Paleontological Resources, paragraph 4, has been modified as follows:

Transportation Improvements. Construction activities at the BART Station would be associated with the Diamond Street widening variant, ~~Muni Metro J Church~~ pedestrian connectivity improvements ~~bridge,~~ BART Station plaza improvements, and the bus loop improvement.

Widening of Diamond Street Variant. The proposed Diamond Street widening variant would consist of widening Diamond Street with a northbound right-turn lane. Inadvertent damage to the BART Station plaza could occur during construction due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction altering the BART Station plaza would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Diamond Street widening variant would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III-30, which requires compliance with Secretary of the

Interior's Standards for Treatment of Historic Properties and Mitigation Measures M-CP-2A through M-CP-2C, described below.

~~*Proposed Muni Metro J Church Pedestrian Bridge Improvement.* Construction activities associated with the proposed bridge would occur towards the southwest corner of the parcel containing the station, far enough way to not significantly impact the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Inadvertent damage to the BART Station could occur during the construction of the elevator due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the elevator would result in a potentially significant impact, because it could materially impair those physical characteristics of the station that justify the BART Station's eligibility for inclusion in the California Register.~~

This significant impact of the proposed Muni Metro J Church Pedestrian Bridge elevator on the BART Station would be reduced to a less than significant level through implementation of Mitigation Measure M-CP 1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, together with Mitigation Measures M-CP 2A through M-CP 2C, described below.

Page III.D-36, Cultural and Paleontological Resources, first paragraph, has been modified as follows:

Proposed Muni Metro J Church Pedestrian Bridge Improvement. Construction activities associated with the proposed bridge would occur towards the southwest corner of the parcel containing the station, far enough way to not significantly impact the BART Station. However, the elevator would be located at the station's north elevation just south of the existing BART ticket machines. Inadvertent damage to the BART Station could occur during the construction of the elevator due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the elevator would result in a potentially significant impact, because it could materially impair those physical characteristics, such as the

exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed Muni Metro J-Church Pedestrian Bridge elevator on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, together with Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resource during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historical resource ~~and~~ documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

Muni Metro J-Church At-Grade Crossing Variant. Inadvertent damage to the BART Station could occur during the construction of the pedestrian ramp due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction of the pedestrian ramp would be a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed elevator on the BART Station would be reduced to a less-than-significant level through incorporation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resource during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historical resource ~~and~~ documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

BART Station Plaza Improvements. The redesign of the BART Station plaza would consist of removing walls and fences, expanding at-grade access, and linking Muni passenger areas to improve pedestrian access in the BART Station plaza. Inadvertent damage to the BART Station could occur during construction altering the BART Station plaza due to heavy machinery use, vibration, and other construction activity. In order to provide a cautious disclosure of impacts on the BART Station, this analysis assumes construction altering the BART Station plaza would result in a significant impact, because it could materially impair those physical characteristics, such as the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register.

This significant impact of the proposed BART Station Plaza Improvements would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A calls for the protection of historical resource during construction by following a specific plan. Mitigation Measure M-CP-2B calls for historical resource documentation and protection, and Mitigation Measure M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

BART Station Bus Loop Improvement. Inadvertent damage to the Glen Park BART Station could occur during the construction of the concourse level entry and the walk-through bridge associated with the proposed BART Station Bus Loop Improvement. The damage could occur due to heavy machinery use, vibration, and other construction activity, which would be considered a significant impact. This significant impact on the BART Station would be reduced to a less-than-significant level through implementation of Mitigation Measure M-CP-1, p. III.D-30, which requires compliance with Secretary of the Interior's Standards for Treatment of Historic Properties, and Mitigation Measures M-CP-2A through M-CP-2C, pp. III.D-34 to III.D-35. Mitigation Measure M-CP-2A, calls for the protection of historical resources during construction by following a specific plan while working near these intersections. Mitigation Measure M-CP-2B calls for historic resource ~~and~~ documentation and protection, and Mitigation Measure

M-CP-2C calls for verification of historic preservation. Implementation of these mitigation measures would reduce the impact of construction activities on the BART Station to a less-than-significant level.

No Bus Loop Variant. The No Bus Loop Variant would consolidate existing private vehicle drop-off areas on Bosworth Street and on Diamond Street. This variant would not directly impact the BART Station and would have minor construction impact on its exterior plazas. It would not materially impair those physical characteristics, such as the exterior plazas, of the Glen Park BART Station that justify its eligibility for inclusion in the California Register. The impact would therefore be considered less than significant.

Page III.D-40, Cultural and Paleontological Resources, last paragraph, has been modified as follows:

The slope debris in the plan area may contain fossils eroded from the Franciscan rocks, but such fossils would have been transported from their original locations and would lack stratigraphic context and, therefore, would be of limited scientific value. For the same reason, no valuable fossils are likely to occur in the artificial fill. In the unlikely event that paleontological resources are discovered in the area during construction activities extending into previously undisturbed soil or rock, ~~a potential~~ significant impact on paleontological resources could occur. Implementation of Mitigation Measure M-CP-4 would reduce impacts of the 2010 Community Plan to paleontological resources to a less-than-significant level. This mitigation would apply if excavation in the plan area is expected to extend into previously undisturbed soil or rock.

Page III.D-41, Cultural and Paleontological Resources, paragraph 1, has been modified as follows:

M-CP-4 Paleontological Resources Monitoring Plan. If excavation in the plan area is expected to extend into previously undisturbed soil or rock, ~~t~~The SFMTA, BART, and any other agency that may have jurisdiction shall retain the services of a qualified paleontological consultant having expertise in California paleontology to design and implement a monitoring and mitigation program. The program shall include a description of when and where construction monitoring would be required; emergency discovery procedures; sampling and data

recovery procedures; procedures for the preparation, identification, analysis, and curation of fossil specimens and data recovered; preconstruction coordination procedures; and procedures for reporting the results of the monitoring program. If potentially important paleontological resources (fossilized invertebrate, vertebrate, plant, or micro-fossil) are encountered during excavation, work shall cease within 25 feet of the feature, the ERO shall be notified, and the paleontologist shall identify and evaluate the significance of the potential resource, documenting the findings in an advisory memorandum to the ERO...

STAFF-INITIATED TEXT CHANGES

Changes to Clarify Project Components and Associated Impacts

Page S-7, Summary, Table S-2, has been modified as follows:

Pedestrian Access		
Pedestrian Connectivity between Muni Metro J-Church Light Rail Platform and Glen Park BART Station	New pedestrian bridge from existing Muni Metro J-Church light rail platform to the intersection of San Jose Avenue off-ramp, Diamond Street, and Monterey Boulevard. ^d	New at-grade ramp (with or without bus loop)
<u>BART Station Plaza Improvements</u>	<u>Plaza alterations to improve pedestrian access and access for persons with disabilities in the BART Station plaza.</u>	<u>No variants</u>
<u>Pedestrian Improvements under Overpasses</u>	Improvement of pedestrian experience under I-280 and San Jose Avenue.	No variants

Page S-11, Summary, Table S-3, has been modified as follows:

Cultural and Paleontological Resources	CP-1 Operation and design associated with the 2010 Community Plan's <u>Diamond Street widening variant, pedestrian connectivity improvements</u> access , <u>BART Station plaza improvements</u> , and bus loop <u>improvement</u> at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource.	S	<i>M-CP-1 Verification of Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.</i> San Francisco Municipal Transportation Agency (SFMTA), in cooperation with BART and any other agency that may have jurisdiction, will prepare materials describing and depicting the <u>widening of Diamond Street variant, pedestrian connectivity improvements</u> measures , <u>BART Station plaza improvements</u> , and bus loop <u>improvement at the BART Station</u> , including but not limited to plans, drawings, and photographs of existing conditions. Prepared materials will be submitted to the Planning Department <u>for review by staff who meet the Secretary of Interior's professional qualification standards</u> . The Planning Department <u>Such staff will review</u> and the Historic Preservation Commission shall approve the project for compliance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> . If any aspect of the design of the <u>widening of Diamond Street variant, pedestrian bridge connectivity improvements, BART Station plaza improvements, or and bus loop improvement at the BART station</u> is determined to be inconsistent with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> , SFMTA, BART, and any other agency that may have jurisdiction shall pursue and implement a redesign of those elements, consistent with the goals and objectives of the project, such that consistency with the standards is achieved.	LTS/ MM
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Page S-41, Summary, Table S-5, has been modified as follows:

Cultural and Paleontological Resources	CP-1 Operation and design associated with the <i>2010 Community Plan's Diamond Street widening variant, pedestrian connectivity improvements, access, BART Station plaza improvements, and bus loop improvement</i> at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. Less than Significant with Mitigation Measure M-CP-1.	Less than Significant with Mitigation Measure M-CP-1.	Less than Significant with Mitigation Measure M-CP-1.
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Page II-22, Project Description, Table II-3, has been modified as follows:

Pedestrian Access		
Pedestrian Connectivity between Muni Metro J-Church Light Rail Platform and Glen Park BART Station	New pedestrian bridge from existing Muni Metro J-Church light rail platform to the intersection of San Jose Avenue off-ramp, Diamond Street, and Monterey Boulevard. ^d	New at-grade ramp (with or without bus loop)
<u>BART Station Plaza Improvements</u>	<u>Plaza alterations to improve pedestrian access and access for persons with disabilities in the BART Station plaza.</u>	<u>No variants</u>
Pedestrian Improvements under Overpasses	Improvement of pedestrian experience under I-280 and San Jose Avenue.	No variants

Page II-30, Project Description, a new paragraph 1 has been inserted as follows:

BART Station Plaza Improvements. The 2010 Community Plan suggests alterations to the BART Station plaza that could improve the pedestrian experience between transit services, the commercial district, and the BART Station. The improvements include removing walls and fences, expanding at-grade access, and linking Muni passenger areas.

Page III.D-12, Cultural and Paleontological Resources, 2nd paragraph, has been modified as follows:

Glen Park BART Station

The Glen Park BART Station appears to be eligible for the California Register under Criterion 3 (Design/Construction) for possessing high artistic value, for representing the work of a master, and for embodying the distinctive characteristics of a period. Its character-defining features are the exterior plazas, in particular the circular courtyard, interplay of building materials including BART rails for the roof structure, rusticated concrete, marble mosaic, slate cladding, painted concrete materials, and roof form. It does not yet appear to be eligible for the National Register, since it does not appear to meet the higher threshold of Criterion Consideration G for buildings that are less than 50 years old. Although the station was completed in 1970 and is not yet 45 years old, the building is able to express its historical significance for listing in the California Register. While the BART Station does not appear to be eligible for the National Register under Criterion Consideration G, it is eligible for listing as a City Landmark.

Page V-6, Alternatives, last paragraph regarding Alternative B, has been modified as follows:

Transportation improvements would also be implemented as proposed under the *2010 Community Plan*. Because the transportation improvements are the same under the proposed project, all impacts discussed under the proposed project apply for Alternative B. As discussed for the *2010 Community Plan*, the Diamond Street widening variant would alter portions of the exterior plazas of the BART Station, which are character-defining features. ~~T~~he existing pedestrian bridge would be rebuilt and an elevator would be constructed between Diamond Street and the BART Station ~~entry~~ plaza that would alter the BART Station. The BART Station plaza improvements would modify the BART Station by removing walls and fences, expanding at-grade access, and linking Muni passenger areas to improve access. ~~This~~ These improvements could materially impair those physical characteristics, including the exterior plazas, of the station that justify the BART Station's eligibility for inclusion in the California Register. In addition, the BART Station loop improvement would construct the concourse level entry at the Glen Park BART Station's south elevation and the walk-through bridge through the station to the north-end plaza. This modification would reconfigure the staircase at the north plaza which would alter the station's character-defining features, including its interior space and the exterior plazas. Alternative B, like the proposed project, could

significantly impact the design and character of the interior space, including, but not limited to the relationship of the roof form, the interior tile mosaic, and the fenestration. Detailed drawings have not been prepared for the proposed project.

Page V-14, Alternatives, last paragraph regarding Alternative C, has been modified as follows:

Transportation improvements would also be implemented as proposed under the 2010 *Community Plan*. Because the transportation improvements are the same under the proposed project and Alternative B, all impacts discussed under the proposed project apply for Alternative C. In addition, impacts associated with the Diamond Street widening variant, pedestrian connectivity bridge improvements, BART Station plaza improvements, and the bus loop improvement would be the same as described under Alternative B and Mitigation Measure M-CP-1 would apply. ~~Please refer to the discussion presented under Alternative B, Cultural Resources above, for the impact discussion associated with the Muni Metro J-Church Pedestrian Bridge improvement and the BART Station loop improvement and the associated Mitigation Measure M-CP-1.~~ Mitigation Measure M-CP-1 described in Section III.D, Cultural Resources, p. III.D-30, requires compliance with *Secretary of the Interior's Standards for Treatment of Historic Properties*.

Page V-15, Alternatives, 1st paragraph:

A paragraph break has been inserted in front of the sentence beginning with “As with Alternative B, Alternative C...”

Page V-20, Alternatives, Table V-1, has been modified as follows:

Cultural and Paleontological Resources	<p>CP-1 Operation and design associated with the 2010 <i>Community Plan's Diamond Street widening variant</i>, pedestrian <u>connectivity improvements</u>access, <u>BART Station plaza improvements</u>, and bus loop <u>improvement</u> at the BART Station would cause a substantial adverse change in the significance of the BART Station, a historical resource. Less than Significant with Mitigation Measure M-CP-1.</p>	Less than Significant with Mitigation Measure M-CP-1.	Less than Significant with Mitigation Measure M-CP-1.
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Plan Refinements Changes

Page S-3, Summary, 3rd paragraph, has been modified as follows:

Implementation of the *2010 Community Plan* would involve modification of Planning Code land use controls. A new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District would incorporate parcels along Diamond Street, Chenery Street, Joost Avenue, and Wilder Street currently zoned NC-2 (Small-Scale Neighborhood Commercial) and RH-3 (Residential House, Three Family). In addition, 605 Chenery Street and 3121-25 Castro Street would be rezoned from RH-2 (Residential House, Two Family) to Glen Park NCT. The Glen Park NCT District rezoning would permit new physical changes such as modifications to density controls, increased heights, setbacks, façade treatments, and minimization of curb cuts. This EIR recognizes that physical impacts could occur as a result of subsequent development resulting from rezoning, and considers such impacts within this EIR.

Page S-5, Summary, Table S-1, has been modified as follows:

	Residential	Commercial	Parking
Diamond Street/ Bosworth Street	47	8,582	26
BART Parking Lot	90	14,913	123
Other Development	13	<u>95,250</u>	0
Total	150	<u>23,495</u> 28,745	149

Page S-41, Summary, Table S-5, has been modified as follows:

Proposed Project	Alternative B - Reduced Development - High Residential/Low Retail Development	Alternative C - Reduced Development - Hybrid Mix
Description		
Northwest Corner of Diamond Street and Bosworth Street	Northwest Corner of Diamond Street and Bosworth Street	Northwest Corner of Diamond Street and Bosworth Street
Up to 47 residential units	Up to 10 residential units	Up to 15 residential units
Up to 8,582 gsf ground-floor commercial	Up to 1,000 gsf ground-floor commercial	No ground-floor commercial
Up to 26 private parking spaces	Up to 11 private parking spaces	Up to 15 private parking spaces
BART Parking Lot	BART Parking Lot	BART Parking Lot
Up to 90 residential units	Up to 31 residential units	19 residential units
0 to 14,913 gsf commercial uses	Up to 2,000 gsf commercial uses	Up to 5,000 gsf commercial uses

**TABLE S-5
COMPARISON OF SIGNIFICANT IMPACTS OF THE PROJECT TO ALTERNATIVES B AND C**

Proposed Project	Alternative B - Reduced Development - High Residential/Low Retail Development	Alternative C - Reduced Development - Hybrid Mix
Up to 123 private parking spaces	Up to 33 private parking spaces	Up to 22 private parking spaces
Other Development	Other Development	Other Development
13 residential units	13 residential units	13 residential units
<u>5,250 gsf ground-floor commercial</u>	<u>5,250 gsf ground-floor commercial</u>	<u>5,250 gsf ground-floor commercial</u>
Proposed Transportation Improvements	Proposed Transportation Improvements	Proposed Transportation Improvements
Traffic Calming	Traffic Calming	Traffic Calming
Bicycle Networks	Bicycle Networks	Bicycle Networks
Pedestrian Access	Pedestrian Access	Pedestrian Access
Transit Improvements	Transit Improvements	Transit Improvements

Source: PBS&J, 2011.

Page S-49, Summary, 2nd and 3rd paragraph, has been modified as follows:

As described under the proposed project, other development potential within the Glen Park NCT District would be expected to occur over the life of the *2010 Community Plan*. The maximum development potential in the plan area, excluding development potential associated with the two infill sites, would be 13 residential units and 5,250 gsf of ground-floor commercial uses, the same as under the proposed project. ~~No increase in commercial floor area is anticipated outside of the two infill sites.~~

In summary, the development at the infill sites under Alternative B would be reduced to 54 residential units compared to 150 under the proposed project. In addition, the total commercial space would be limited to 3,000 gsf compared to approximately ~~24,000~~ 28,745 gsf proposed under the *2010 Community Plan*.

Page S-51, Summary, last paragraph, has been modified as follows:

Other development potential within the Glen Park NCT District would be expected to occur over the life of the *2010 Community Plan*. The maximum development potential in the plan area, excluding development potential associated with the two infill development sites would be 13 residential units and 5,250 gsf of ground-floor commercial uses, the same as under the

proposed project. ~~No increase in commercial floor area is anticipated outside of the two infill sites.~~

Page S-52, Summary, first paragraph has, been revised as follows:

In summary, the development at the infill sites would be reduced to 47 residential units compared to 150 under the proposed project. In addition, the total commercial space would be limited to 5,000 gsf compared to approximately ~~24,000~~ 28,745 gsf proposed under the 2010 *Community Plan*.

Page II-2, Project Description, paragraph 3, has been modified as follows:

The 2010 *Community Plan* includes a draft implementation program that outlines follow up actions that are recommended to take place in order to make the plan's vision a reality. Actions include updating the Planning Code to reflect the zoning change of Neighborhood Commercial (NC-2), Residential House, Three Family (RH-3), and Residential House, Two Family (RH-2) zoned properties 605 Chenery Street and 3121-25 Castro Street to Glen Park Neighborhood Commercial Transit (NCT) District; considering rezoning the BART parking lot; preserving historic resources by the Historic Preservation Commission (HCP) and nominating eligible properties to the California Register of Historical Resources (California Register); developing a greenway design for greenway path; conducting technical studies of daylighting portion of Islais Creek through Glen Park; and promoting other open space in the area.

Page II-3, Project Description, Table II-1, has been modified as follows:

**TABLE II-1
COMPARISON OF 2003 AND 2010 COMMUNITY PLANS**

Plan Component	2003 Community Plan Summary^a	2010 Community Plan^{b, c, d}
Land Use Policies and Planning Code Amendments		
Revised Land Use Districts	Rezoning of small-scale Neighborhood Commercial (NC-2) zoning to Glen Park NCT zoning.	<u>Same, except for the additional rezoning of Residential House, Three Family (RH-3) and Residential House, Two Family (RH-2) zoned properties at 605 Chenery Street and 3121-25 Castro Street to Glen Park NCT zoning.</u>
	Rezoning of BART parking lot infill site, Public (P) zoning to Glen Park NCT and Residential, Two Family (RH-2) zoning.	Removed. BART parking lot site is not proposed to be rezoned as part of the Community Plan process.
	Rezoning of Diamond/Bosworth infill site from NC-2/RH-2 to Glen Park NCT zoning.	Same

**TABLE II-1
COMPARISON OF 2003 AND 2010 COMMUNITY PLANS**

Plan Component	2003 Community Plan Summary^a	2010 Community Plan^{b, c, d}
Revisions to Height and Bulk Controls	Rezoning of parcels to Glen Park NCT to increase height from 40 to 45 feet.	Same, <u>except for portions of Wilder Street, Diamond Street, and Chenery Street which would decrease in height from a range of 40 to 45 feet to a range of 30 to 35 feet under the Glen Park NCT zoning.</u>
	Rezoning of parcels to Glen Park NCT, at the BART parking lot site, to increase height from 40 to 65 feet.	Removed
Historic Preservation Policies	Not included	Policies encouraging the preservation of historic resources in the Glen Park neighborhood.
Design Guidelines		
Public Realm (Streetscape) Guidelines	Streetscape design guidelines for public realm improvements.	Removed
Architectural Design Guidelines	Architectural design guidelines for the commercial core.	Removed
Infill Site Design Guidelines	Site-specific design guidelines for infill sites.	Removed
Transportation Improvements		
Traffic Calming	Traffic calming improvements along Bosworth Street and at the intersection of Diamond Street and Bosworth Street.	Same
Bicycle Networks	San Francisco Bicycle Plan improvements 5-7a and 5-7b.	Same
Pedestrian Access	Pedestrian connection to the Muni Metro J-Church stop.	Same
Transit Improvements	Connection between Muni bus service and the Glen Park BART Station.	Same
Parking	Suggested methods to better utilize on-street parking.	Same
Greenway Improvements		
Linear greenway	Development of linear greenway connecting Glen Canyon Park to Downtown Glen Park.	Policies encouraging the greenway connection of Glen Canyon Park to Downtown Glen Park.
Daylighting of Islais Creek	Strategies and design measures for daylighting of Islais Creek.	Policies encouraging the daylighting of Islais Creek.

Sources: SFMTA, City and County of San Francisco Planning Department, PBS&J, 2011.

- City and County of San Francisco, Planning Department, *Glen Park Community Plan Summary*, November 2003. Available at: <http://www.sfgov.org/site/uploadedfiles/planning/citywide/pdf/gpdplowres.pdf>.
- City and County of San Francisco, Planning Department, *Glen Park Community Plan, Working Draft for Community Discussion, (Appendix B)*, September 2010. Available at: http://www.sflanning.org/ftp/files/Citywide/Glen_Park/Glen_Park_Community_Plan_091310.pdf
- City and County of San Francisco, Planning Department, *Glen Park Community Plan (2010) Text Changes*, Memo from Jon Swae to Lisa Gibson, March 22, 2011. See Appendix C.
- City and County of San Francisco, Planning Department, *Glen Park Community Plan Refinements Subsequent to Draft EIR Publication*, Memorandum from Jon Swae to Lisa Gibson, September 23, 2011. See Appendix C.

Page II-13, Project Description, 1st and 3rd paragraphs, has been modified as follows:

Revisions to Use Districts

Implementation of the *2010 Community Plan* would introduce a new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District to reflect the area's proximity to abundant transit service. The new Glen Park NCT District would incorporate parcels along Diamond Street, Chenery Street, Joost Avenue, and Wilder Street currently zoned NC-2 and RH-3, and 605 Chenery Street and 3121-3125 Castro Street currently zoned RH-2, as shown in Figure II-3, p. II-14. The *2010 Community Plan* does not propose rezoning the BART parking lot, which currently is in the Public (P) District. This EIR, however, analyzes the potential environmental effects that would result from infill development on this site under a potential future rezoning scenario, described on p. II-17.

Revisions to Height and Bulk Districts

Implementation of the *2010 Community Plan* would involve modification of height and bulk controls in the San Francisco Planning Code. While most of the plan area would retain the prevailing height limit of 40-X, the height limit would be increased to 45 feet in areas rezoned to Glen Park NCT to encourage active ground-floor uses.⁸ An increase in five feet would allow for storefronts with more space and provide easy access for pedestrians. The increase, however, does not allow for an additional floor of development. The *2010 Community Plan* does not propose rezoning the BART parking lot, which would remain in the 40-X Height and Bulk District.

⁸ Subsequent to the publication of the DEIR, height districts in the *2010 Community Plan* were revised to more closely reflect the heights of existing development in the Glen Park village core. The height district refinement would reduce the maximum height of new construction along portions of Wilder Street, Diamond Street, Castro Street, and Chenery Street in the Glen Park NCT district from a range of 40 to 45 feet to a range of 30 to 35 feet. A map showing the proposed height district revision is contained in Appendix C. However, for the purpose of this EIR, a height limit of 45 feet in areas rezoned to Glen Park NCT is still being analyzed to present a conservative estimate of impacts.

Page II-18, Project Description, last paragraph, has been modified as follows:

The maximum development potential in the plan area, excluding development potential associated with the two infill sites discussed above, is estimated to be 13 residential

units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street. The exact location of ~~these~~ the 13 units is unknown at this time. Therefore, they are not shown in Figure II-3, p. II-14. No increase in ~~commercial floor areas or~~ parking is anticipated.⁴⁰

An increase in commercial floor area could potentially occur on six residentially zoned parcels on Diamond Street (2928-2958) that are proposed to be rezoned from RH-3 to Glen Park NCT. The proposed rezoning would increase the development potential within the plan area. Given the existing residential uses, it is not yet known at this time if commercial development would occur on these six parcels. However, for the purpose of this EIR, it is expected that over the life of the 2010 Community Plan commercial development could occur. The rezoning of the parcels on Diamond Street to Glen Park NCT could potentially allow the conversion of ground-floor garages into commercial spaces at some future time while allowing existing residential units to remain. Assuming that half of the garages would redevelop by 2030 in response to the zoning change, the amount of commercial space that could be created is approximately 5,250 sf.¹⁰

⁴⁰ All of the existing buildings within the parcels that would be rezoned currently contain ground floor commercial uses. Because the Glen Park NCT District limits commercial uses to the ground floor, commercial uses would be replaced at a 1:1 ratio.

¹⁰ Atkins, Glen Park Community Plan EIR – Additional Retail Space on Diamond Street Associated with Plan Refinements Subsequent to DEIR Publication, memorandum from Gui Shearin to Lisa Gibson, September 28, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004!. Based on an aerial photograph, the buildings are approximately 25 feet wide and 65 to 70 feet deep. The total ground floor area of the six residential properties may be as much as 10,500 sf, depending upon the depth of the buildings. For this analysis, it was estimated that up to half, or 5,250 sf, of the properties ground-floor garages could be developed into commercial space.

Page II-19, Project Description, Table II-2, has been modified as follows:

**TABLE II-2
SUMMARY OF MAXIMUM DEVELOPMENT POTENTIAL**

	Residential	Commercial	Parking
Diamond Street/ Bosworth Street	47	8,582	26
BART Parking Lot	90	14,913	123
Other Development	13	05,250	0
Total	150	23,495 <u>28,745</u>	149

Page III.B-10, Land Use, 3rd paragraph, has been modified as follows:

Infill Development. The *2010 Community Plan* includes policies recognizing the potential for mixed-use development at two sites within the plan area, including the northwest corner of Diamond Street and Bosworth Street and the BART parking lot. In addition, it is expected that over the life of the *2010 Community Plan*, development of an additional 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses within the proposed Glen Park NCT District could occur. Changes in land use at the two infill sites and for the 13 additional units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses would be consistent with goals of the General Plan related to increased housing and neighborhood services within walking distance to transit centers (the Glen Park BART Station). Consistency with other aspects of the General Plan, and other adopted plans, policies and regulations, would be addressed when detailed development proposals and improvements are subsequently considered for approval. Overall, future development of the two infill sites and the additional 13 units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses would not conflict with General Plan land use policies.

Page III.B-12, Land Use, 1st full paragraph, has been modified as follows:

Implementation of the *2010 Community Plan* would involve revisions to the existing Planning Code use and height districts in the plan area, as described in Chapter II, Project Description, p. II-13. The proposed zoning changes would occur in the commercial core area where active ground-floor retail would be encouraged and would modify parking regulations and residential densities. Existing and proposed zoning districts are illustrated in Figure II-2, p. II-10, and Figure II-3, p. II-14. Overall, implementation of the *2010 Community Plan* would increase height limits. While most of the plan area would retain the prevailing height limit of 40 feet, the height limit for areas rezoned to Glen Park NCT would be increased to up to 45 feet,⁸ and the height limit at the BART parking lot is assumed to be increased to 65 feet.

⁸ As described in the Project Description, p. II-13, the height district refinement would reduce the maximum height of new construction along portions of Wilder Street, Diamond Street, Castro Street, and Chenery Street in the Glen Park NCT district from a range of 40 to 45 feet to a range of 30 to 35 feet. A map showing the proposed height district revision is contained in Appendix D. However, for the purpose of this EIR, a height limit of 45 feet in areas rezoned to Glen Park NCT is still being analyzed to present a conservative estimate of impacts.

Page III.B-13, Land Use, last two paragraphs, have been revised as follows:

Infill Development. The *2010 Community Plan* contains policies recommending consideration of new development on two infill sites and development of 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses near existing transit, and would not propose changes to established residential neighborhoods surrounding the plan area. Figure II-3, p. II-14, identifies the two infill sites in the plan area. The additional 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street could be developed within the Glen Park NCT District; however, the exact location of ~~these~~ the 13 units is unknown at this time. Therefore, these units are not shown in Figure II-3, p. II-14.

The potential infill site on the northwest corner of Diamond Street and Bosworth Street would consist of mixed-use development, including residential and commercial uses. The maximum building height at this site would be up to 45 feet. Accordingly, the site could be developed with three- to four-story mixed-use residential and commercial (ground-floor commercial and upper-floor residential) buildings.

Page III.C-7, Aesthetics, 1st paragraph, has been modified as follows:

General Impacts. The Initial Study for the *2003 Community Plan Summary* concludes that the proposed zoning modifications could have a potentially significant impact on existing visual resources due to the increase in building height limits (see Appendix A, pp. 43-44). The *2010 Community Plan* proposes modifications to existing zoning but does not include any specific development proposals. The proposed zoning modifications would introduce a new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District for parcels along Diamond Street, Wilder Street, Joost Avenue, and Chenery Street currently zoned NC-2 and RH-3, and 605 Chenery Street and 3121-3125 Castro Street currently zoned RH-2. As described previously, the NCT District would introduce a new 45-X height limit, which would moderately raise the prevailing height limit by five feet and encourage active ground-floor uses. Currently, structures in the plan area range from one to four stories with some structures approaching the existing 40-foot height limit. Future development under the NCT District has the potential to include structures five feet higher; however, it is anticipated this additional height would be added to the ground floor and would not allow for another floor of development. This would allow for storefronts with more space and provide easy

access for pedestrians. Thus, the continuity of the existing streetscapes would be maintained and the visual character would remain consistent with existing uses.

Page III.C-8, Aesthetics, last paragraph, has been modified as follows:

Infill Development. The *2010 Community Plan* includes policies for potential mixed-use development at two sites within the plan area, including the northwest corner of Diamond Street and Bosworth Street and the BART parking lot. In addition, it is expected that over the life of the *2010 Community Plan*, development of an additional 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses within the proposed Glen Park NCT District could occur. Figure III.C-3, p. III.C-9, depicts four viewpoint locations within the plan area. Figure III.C-4 through Figure III.C-7, pp. III.C-10 to III.C-13, depict visual simulations showing existing conditions and potential building envelopes under the revised land use controls from each of the four viewpoint locations, respectively. These viewpoints were chosen because they best represent the character of the....

Page III.D-9, Cultural and Paleontological Resources, 3rd paragraph, has been modified as follows:

The plan area contains ~~159~~160 parcels with structures over 45 years old. In addition, two parcels contain the Glen Park BART Station (BART Station) and power station constructed in 1970 (~~161~~162 parcels total). Although not over 45 years old, the BART Station is recognized for its architectural significance. Of the ~~161~~162 parcels, Carey & Co. surveyed 110 parcels east of Lippard Avenue, while the Planning Department surveyed 51 parcels west of Lippard Avenue and 1 parcel east of Lippard Avenue.^{8,9} Each structure over 45 years old and the BART Station and power station were recorded on State of California Department of Parks and Recreation (DPR) Primary Record (523A) forms. The forms from the Carey & Co. survey are located in Appendix C of the Carey & Co. HRE^{9,10} ~~and~~ the forms from the Planning Department survey are located in Appendix A of the HRE completed by the Planning Department;^{10,11} and the form from the Planning Department evaluation of the one property east of Lippard Avenue is attached to the Planning Department Historic Resource Evaluation Response.¹² These background documents are available for review by the public at the Planning Department.

⁸ San Francisco Planning Department, *San Francisco Glen Park Area Plan HRE: West of Lippard and NCT*, January 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

⁹ San Francisco Planning Department, *Historic Resources Evaluation Response, Glen Park Community Plan – July 2011 Refinements*. August 16, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

⁹¹⁰ Carey & Co., Inc., *Historic Resources Evaluation, Draft Glen Park Community Plan, San Francisco, California*, December 21, 2010. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

⁴⁰¹¹ San Francisco Planning Department, *San Francisco Glen Park Area Plan HRE: West of Lippard and NCT*, January 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

¹² San Francisco Planning Department, *Historic Resources Evaluation Response, Glen Park Community Plan – July 2011 Refinements*. August 16, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

Page III.D-11, Cultural and Paleontological Resources, 1st paragraph, has been modified as follows:

The Planning Department completed an additional HRE, dated March 24, 2011, which documents the Departments' survey of historic-age (built in or before 1964) properties west of Lippard Avenue (51 total).¹¹ In addition, the Planning Department completed an HRER of one historic-age property east of Lippard Avenue.¹² The Department found two properties to be eligible for the California Register. These properties are located at:

¹¹ San Francisco Planning Department, *San Francisco Glen Park Area Plan HRE: West of Lippard and NCT*, January 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

¹² San Francisco Planning Department, *Historic Resources Evaluation Response, Glen Park Community Plan – July 2011 Refinements*. August 16, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

Page III.D-19, Cultural and Paleontological Resources, 1st and 2nd paragraphs, have been modified as follows:

Evaluation of Historic Districts

No local, State, or national register-eligible historic districts were identified within the areas surveyed by Carey & Co. or the Planning Department. Six areas were evaluated for potential districts, but none met the thresholds of significance.^{14,15} In general, surveyed parcels contain buildings designed in a range of architectural styles and massing and are interspersed with newer development and buildings with a low threshold of integrity. Therefore, none of the ~~161~~162 parcels surveyed appear to qualify as districts.

Previous Evaluations

None of the surveyed resources in the plan area have been previously listed as a California Point of Historical Interest, as a California Historical Landmark, on the California Register, or on the National Register. They also have not been listed as a San Francisco Structure of Merit or Landmark, or as a contributing building to a historic or conservation district in the City. Lastly, previous local surveys such as the 1968 Junior League of San Francisco Survey, the 1976 Planning Department Citywide Architectural Survey, the 1978 San Francisco Architectural Heritage Survey, and the 1990 Unreinforced Masonry Building Survey did not identify any of the ~~464~~162 parcels surveyed.^{16,17,18} The Glen Park BART Station is included in the US/Northern California Chapter's Northern California Modern Register¹⁹ of notable modern buildings in the Bay Area.

¹⁴ Carey & Co., Inc., *Historic Resources Evaluation, Draft Glen Park Community Plan, San Francisco, California*, December 21, 2010. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

¹⁵ San Francisco Planning Department, *San Francisco Glen Park Area Plan HRE: West of Lippard and NCT*, January 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2005.1004E.

¹⁶ Olmsted, Roger and T.H. Watkins, *Here Today San Francisco's Architectural Heritage*, 1968.

¹⁷ Corbett, Michael R., *Splendid Survivors San Francisco's Downtown Architectural Heritage*, 1979.

¹⁸ A context statement and architectural/historical survey of unreinforced masonry building (UMB) construction in San Francisco from 1850 to 1940 submitted by the Landmarks Preservation Advisory Board, San Francisco Department of City Planning. Published 1990 by Landmarks Preservation Advisory Board in San Francisco.

¹⁹ Northern California Chapter of the international DOCOMOMO, *Documentation and Conservation of the Modern Movement*. Available at: http://www.docomomo-us.org/chapters/northern_california. Accessed January 10, 2011.

Page III.D-28, Cultural and Paleontological Resources, 2nd paragraph, has been modified as follows:

Infill Development. The *2010 Community Plan* encourages consideration of infill development at two sites: the Bosworth Street/Diamond Street site and the BART parking lot site. In addition, it is expected that over the life of the *2010 Community Plan*, development of additional 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street within the proposed Glen Park NCT District could occur. Neither of the two infill sites contain historical structures and the *2010 Community Plan* does not include any specific development

proposals for either site. While the additional 13 residential units could be developed on a site with an existing historical structure, the location of these units is not known at this time. As described in the Project Description, p. II-1, the scale of development potential at the Bosworth Street/Diamond Street infill site and at the additional 13 residential units would be 45 feet. The additional 5-foot increase (from existing 40-foot height limit) would not physically impair any surrounding historical resource, and would be compatible with adjacent historical resources.

Page III.D-32, Cultural and Paleontological Resources, last paragraph, has been modified as follows:

Infill Development. The *2010 Community Plan* does not include any specific development proposals for the infill sites, or any of the additional 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street that could be constructed within the plan area. Therefore, construction-specific information at this time is unknown. However, construction associated with future development in the plan area could involve subsurface soil-disturbing activities such...

Page III.D-43, Cultural and Paleontological Resources, 2nd paragraph, has been modified as follows:

Infill Development. Ground disturbance associated with future development of the infill sites and the 13 residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses, including construction of building foundations, have potential to remove or disturb human remains. This would be a significant impact. Infill development would be subject to independent study and environmental review in the future. Implementation of Mitigation Measure M-CP-5, above, would reduce potential adverse impacts to human remains to a less-than-significant level.

Page III.E-30, Transportation and Circulation, 1st paragraph, has been modified as follows:

Trip Generation

The person-trip generation rates include residents and visitors of the residential units, plus employees and visitors of the commercial uses, and are based upon weekday daily, AM peak hour, and PM peak hour trip generation rates expressed in number of trips per residential unit and number of trips per 1,000 square feet of retail space.¹³ These rates were applied to the infill development to obtain the person-trips for the project. Based

on information presented in Chapter II, Project Description (see Table II-2, p. II-19), the traffic analysis uses conservative estimates of development potential in the plan area; i.e., assuming the maximum potential development and no credits for existing uses proposed to be replaced by the near-term development. There are approximately 7,000 sf of existing commercial uses at the Diamond Street/Bosworth Street infill site. The transportation analysis of future commercial uses at the Diamond Street/Bosworth Street infill site utilized the conservative assumption that, although this existing commercial floor area and the associated trips would likely be added to or replaced by new infill development, the analysis assumed 8,582 sf of additional commercial space at this infill site, without crediting the 7,000 sf of existing commercial uses. As a result, even though the potential rezoning of the six parcels on the west side of Diamond Street south of Bosworth Street from RH-3 to Glen Park NCT could yield additional commercial floor area of approximately 5,250 sf and correspondingly additional person trips in the Glen Park commercial core, the commercial space and associated trips are accounted for in the analysis performed for the Diamond Street/Bosworth Street infill site in this DEIR. The zoning refinements at 605 Chenery Street and 3121-3125 Castro Street would not generate any additional trips from increased commercial development since the parcels are already being used for commercial uses (legal, non-conforming) and are not anticipated to change. There are currently no proposals for development of private property, and actual projects, if pursued, would likely be of a smaller scale and the estimate of trips from the new use at the site would net out (subtract) those trips associated with the existing land use that would be displaced. If individual property owners pursued development, additional project-level review of the actual proposals would be required.

¹³ Although the *2010 Community Plan* contains policy recommendations for “commercial” land uses, there are also a number of references to retail uses, which are a type of commercial use. In particular, Policy 2.2 mentions infill commercial opportunities and then characterizes these opportunities as small-scale retail development. For the purposes of this EIR, retail trip generation rates are used to estimate travel demand, since retail uses typically exhibit a greater number of trips per square foot than other commercial uses, and thus yield a more conservative (greater) assessment.

Page III.G-25, Air Quality, Table III.G-6, has been modified as follows:

**TABLE III.G-6
CONSTRUCTION CRITERIA AIR POLLUTANT EMISSIONS**

Emission Source	ROG (lbs/day)	NOX (lbs/day)	Exhaust PM₁₀ (lbs/day)	Exhaust PM_{2.5} (lbs/day)
BART Parking Lot Infill Development	50	43	2.6	2.4
Diamond and Bosworth Infill Development	32	37	2.3	2.2
<u>2928-2958 Diamond Street^a</u>	<u>21</u>	<u>5</u>	<u>0.3</u>	<u>0.1</u>
Transportation Improvements				
Intersection and Traffic Calming Improvements (each improvement)	3	23	1.2	1.1
Pedestrian Bridge	3	23	1.2	1.1
Bus Loop	4	42	1.8	1.7
Roundabout	3	23	1.2	1.1
2010 BAAQMD Significance Threshold	54	54	82	54
Any Individual Components Exceed 2010 BAAQMD Threshold?	No	No	No	No
Combined Components Exceed 2010 BAAQMD Threshold?	Yes	Yes	No	No

Source: PBS&J, 20112040. Based on URBEMIS 2007 Version 9.2.4, and compliance with BAAQMD Regulation 8, Rule 3.

a. Atkins, Glen Park Community Plan EIR – URBEMIS Update Associated with Plan Refinements Subsequent to DEIR Publication, memorandum from Kimberly Comacho to Lisa Gibson, October 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as a part of Case No. 2005.1004E.

Page III.G-29, Air Quality, Table III.G-7, has been modified as follows:

**TABLE III.G-7
PROJECT DAILY OPERATIONAL AIR POLLUTANT EMISSIONS^a**

Emissions Source	Project Emissions (Pounds per Day)			
	ROG	NO_x	PM₁₀	PM_{2.5}
BART Parking Lot Infill Site				
Stationary	6.87	1.37	0.2	0.2
Vehicle	9.03	10.82	18.22	3.48
Diamond and Bosworth Infill Site				
Stationary	4.37	0.86	0.01	0.01
Vehicle	5.46	6.51	10.96	2.09
<u>2928-2958 Diamond Street^b</u>				
<u>Stationary</u>	<u>0.13</u>	<u>0.19</u>	<u>0</u>	<u>0</u>
<u>Vehicle</u>	<u>4.52</u>	<u>5.96</u>	<u>0</u>	<u>0</u>
Total	<u>25.73</u> 30.38	<u>19.56</u> 25.71	29.39	5.78
BAAQMD Significance Thresholds	54.0	54.0	82.0	54.0
Exceeds BAAQMD Thresholds?	No	No	No	No

Source: PBS&J, 20112040.

Note:

- a. Emissions are based on maximum development potential for the plan area, as described in Chapter II, Project Description.
- b. Atkins, Glen Park Community Plan EIR – Urbemis Update Associated with Plan Refinements Subsequent to DEIR Publication, memorandum from Kimberly Comacho to Lisa Gibson, October 12, 2011. This report is on file for review at the Planning Department, 1650 Mission Street, Suite 400, as a part of Case No. 2005.1004E.

Page III.H-1, Greenhouse Gas Emissions, 1st paragraph, has been modified as follows:

This section provides a description of global climate change, greenhouse gas (GHG) emissions, the existing regulatory framework governing GHG emissions, and an analysis of the potential impacts related to GHGs associated with implementation of the proposed *2010 Community Plan* including the proposed transportation infrastructure improvements, the anticipated development on the two infill sites, ~~and for~~ the 13 residential units developed any place within the plan area, 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street, and future open space improvements. The proposed project is evaluated for compliance with San Francisco's *Strategies to Address Greenhouse Gas Emissions*, recognized as meeting the criteria of a qualified GHG Reduction Strategy by the Bay Area Air Quality Management District (BAAQMD).

Page III.H-27, Greenhouse Gas Emissions, 1st Paragraph, has been modified as follows:

Infill Development. The two infill sites, ~~and~~ the 13 additional residential units, at-large in the plan area, and 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street that could potentially be developed ~~at any location~~ within the plan area are program-level proposals for which design details are unknown at this time. As such, a GHG Compliance Checklist has not yet been completed for the two infill sites, ~~and~~ the 13 additional residential units, or the 5,250 gsf of ground-floor commercial uses. However, as stated above new development and renovations/alterations for private projects and municipal projects are required to comply with San Francisco's ordinances that reduce greenhouse gas emissions, as applicable. Therefore, because this development would be required to comply with the City's GHG reduction strategy, the potential GHG impacts would be less than significant. Once specific proposals for the infill development, ~~or~~ any of the 13 residential units, at-large in the plan area, or the potential 5,250 gsf of ground-floor commercial uses at 2928-2958 Diamond Street have been designed, a GHG Compliance checklist would be submitted to the San Francisco Planning Department for review and a determination of compliance.

Page IV-1, Other CEQA Considerations, 2nd paragraph, has been modified as follows:

The *Glen Park Community Plan (2010 Community Plan)* is a planning effort that aims to enhance the positive existing features of the neighborhood, while encouraging infill development near transit opportunities and improving accessibility. The fundamental objectives of the *2010 Community Plan* are to guide future infrastructure improvements,

update zoning, design guidelines, and other city policies for future development in the Glen Park neighborhood. Development anticipated under the *2010 Community Plan* would result in the construction of up to 150 dwelling units and up to ~~23,495~~28,745 gsf of retail space. As a result, population in the plan area would increase up to 314 residents² and up to ~~678~~2 employees.³ No population or employment increases would be anticipated as a result of proposed transportation improvements. The project would increase the overall residential population of the City and County of San Francisco by less than 0.1 percent.⁴ Therefore, the *2010 Community Plan* would not induce substantial population growth.

² U.S. Census Bureau, DP-4. "Profile of Selected Housing Characteristics 2000: Census Tract 218, San Francisco County, California." Based on information for Census Tract 218, the average household population was 2.09 persons/household. 150 units x 2.09 persons/unit = approximately 314 residents.

³ Based on San Francisco Transportation Review Guidelines, retail/commercial uses have about 350 to 450 gsf per employee. (~~23,495~~28,745 gsf/350 gsf/employee = ~~678~~2 employees).

⁴ The calculation is based on the ABAG estimated total population of 795,800 persons in the City and County of San Francisco in 2005.

Page IV-2, Other CEQA Considerations, 1st full paragraph, has been modified as follows:

The existing BART parking lot does not have employees and the number of employees currently working at the commercial and retail portions of the Diamond Street/Bosworth Street infill site is unknown, but presumed to be about ten. The proposed project would provide permanent on-site employment for to up to ~~678~~2 persons. The employment generated by the proposed project would result in a net increase of approximately ~~577~~2 employees, which would result in a corresponding demand for approximately ~~435~~4 new housing units.⁶ However, this demand would not be substantial in context of citywide housing growth over the next 20 years.

⁶ According to ABAG Projections 2007, the employees per household ratio in the City of San Francisco in 2000 was 1.33 (437,533 employed residents/329,700 households = 1.33 employees per household). Therefore, ~~577~~2 new employees/1.33 employees per household = approximately ~~435~~4 new housing units.

Page V-4, Alternatives, 2nd and 3rd paragraphs after bullet list, have been revised as follows:

Development potential within the Glen Park NCT district would be expected to occur over the life of the *2010 Community Plan*. The maximum development potential in the plan area, excluding development potential associated with the two infill sites, would be 13 residential units and 5,250 gsf of ground-floor commercial uses, the same as under the proposed project. ~~No increase in commercial floor area is anticipated outside of the two infill sites.~~

In summary, the development at the infill sites under Alternative B would be reduced to 54 residential units compared to 150 under the proposed project. In addition, the total commercial space would be limited to 3,000 gsf compared to approximately ~~24,000~~28,745 gsf proposed under the *2010 Community Plan*.

Page V-5, Alternatives, 2nd paragraph, has been modified as follows:

The maximum development potential in the plan area, excluding development potential associated with the two infill sites, would be 13 residential units and 5,250 gsf of ground-floor commercial uses. The development at the infill sites would be reduced compared to potential development under the *2010 Community Plan*. For the infill sites there would be potential for 54 residential units compared to 150 proposed under the project. In addition, the total commercial space would be limited to 3,000 gsf compared to approximately ~~24,000~~28,745 gsf proposed under the *2010 Community Plan*. Overall, the development at the infill sites anticipated in the plan area under Alternative B would be less than the *2010 Community Plan* and would not have significant adverse impacts on the land use character of the plan area and vicinity. The land use impacts under Alternative B would be less-than-significant as under the proposed *2010 Community Plan*.

Page V-6, Alternatives, 3rd paragraph, has been modified as follows:

Alternative B would result in a less intense use of the plan area than the proposed project. The residential component of Alternative B would consist of 54 residential units, as compared with 150 residential units under the proposed project – a reduction of approximately 64 percent. The retail component of Alternative B would consist of 3,000 gsf, as compared with ~~23,495~~28,745 gsf of retail space under the proposed project – a reduction of approximately ~~87~~89 percent. No historical, archeological, or paleontological

resources would be affected by the reduced development component. As such, no impacts to cultural resources are anticipated as a result of the reduced development.

Page V-8, Alternatives, last paragraph, has been modified as follows:

Alternative B would result in a less intense use of the plan area than the proposed project. The residential component of Alternative B would consist of 54 residential units, as compared with 150 residential units under the proposed project – a reduction of approximately 64 percent. The retail component of Alternative B would consist of 3,000 gsf, as compared with ~~23,495~~28,745 gsf of retail space under the proposed project – a reduction of approximately ~~8789~~ percent. As such, fewer retail and residential trips would be generated, which would reduce the demand for vehicle parking, bicycle parking, pedestrian space, and on and off-street freight loading/unloading. The significant and unavoidable impacts identified for Intersection #10 Bosworth Street / Diamond Street (Existing Conditions and Cumulative Conditions – AM and PM Peak Hour), would likely not occur with Alternative B. In addition, the impacts identified for Intersection #16 Monterey Boulevard/Circular Avenue/I-280 Ramps intersection (Existing Conditions and Cumulative Conditions – AM Peak Hour), would also likely not occur with Alternative B. The project contributions to these affected intersections would be less than with the proposed project. Thus, Mitigation Measures M-TR-1A, M-TR-1B, and M-TR-2.2A would not be necessary.

Page V-12, Alternatives, last two paragraphs, have been revised as follows:

In addition, all of the transportation improvements included under the proposed project would be included under this alternative. These include traffic calming measures at the Bosworth Street and Bosworth Street/Diamond Street intersection; bicycle networks improvements; pedestrian access improvement measures including the connection to the Muni Metro J-Church Line; transit improvements such as the proposed BART Station bus loop improvement; and parking management strategies. As described under the proposed project and Alternative B above, other development potential within the Glen Park NCT district would be expected to occur over the life of the *2010 Community Plan*. The maximum development potential in the plan area, excluding development potential associated with the two infill sites would be 13 residential units and 5,250 gsf of ground-floor commercial uses, the same as under the proposed project. ~~No increase in commercial floor area is anticipated outside of the two infill sites.~~

In summary, the development at the infill sites would be reduced to 47 residential units compared to 150 under the proposed project. In addition, the total commercial space would be limited to 5,000 gsf compared to approximately ~~24,000~~28,745 gsf proposed under the *2010 Community Plan*.

Page V-13, Alternatives, 3rd paragraph, has been modified as follows:

The maximum development potential in the plan area, excluding development potential associated with the two infill sites would be 13 residential units and 5,250 gsf of ground-floor commercial uses. The infill development would be reduced compared to potential development under the *2010 Community Plan*. For the infill development sites there would be potential for 47 residential units compared to 150 proposed under the project. In addition, the total commercial space would be limited to 5,000 gsf compared to approximately ~~24,000~~28,745 gsf proposed under the *2010 Community Plan*. Overall, the infill development anticipated in the plan area under Alternative C would not have significant adverse impacts on the land use character of the vicinity. The land use impacts under Alternative C would be less-than-significant as under the proposed *2010 Community Plan*.

Page V-14, Alternatives, 3rd paragraph, has been modified as follows:

Alternative C would result in a less intense use of the plan area than the proposed project. The residential component of Alternative C would consist of 47 residential units, as compared with 150 residential units under the proposed project – a reduction of approximately 69 percent. The retail component of Alternative C would consist of 5,000 gsf, as compared with ~~23,495~~28,745 gsf of retail space under the proposed project – a reduction of approximately ~~7983~~ percent. No historical, archeological, or paleontological resources would be affected by the reduced development component. As such, no impacts to these resources are anticipated.

Page V-16, Alternatives, 2nd paragraph, has been modified as follows:

Alternative C would result in a less intense use of the plan area than the proposed project. The residential component of Alternative C would consist of 47 residential units, as compared with 150 residential units under the proposed project – a reduction of approximately 69 percent. The retail component of Alternative C would consist of 5,000 gsf, as compared with ~~23,495~~28,745 gsf of retail space under the proposed project – a reduction of approximately ~~7983~~ percent. As such, fewer retail and residential trips

would be generated, which would reduce the demand for vehicle parking, bicycle parking, pedestrian space, and on and off-street freight loading/unloading. The significant and unavoidable impacts identified for Intersection #10 Bosworth Street / Diamond Street (Existing Conditions and Cumulative Conditions – AM and PM Peak Hour) would likely be reduced to a less-than-significant level with Alternative C. In addition, the impacts identified for Intersection #16 Monterey Boulevard/Circular Avenue/I-280 Ramps intersection (Existing Conditions and Cumulative Conditions – AM Peak Hour), would also likely be reduced with Alternative C. The project contributions to these affected intersections would be less than with the proposed project, which would negate the use of the identified mitigation measures. The project contributions to these affected intersections would be less than with the proposed project.

Page V-19, Alternatives, Table V-1, has been modified as follows:

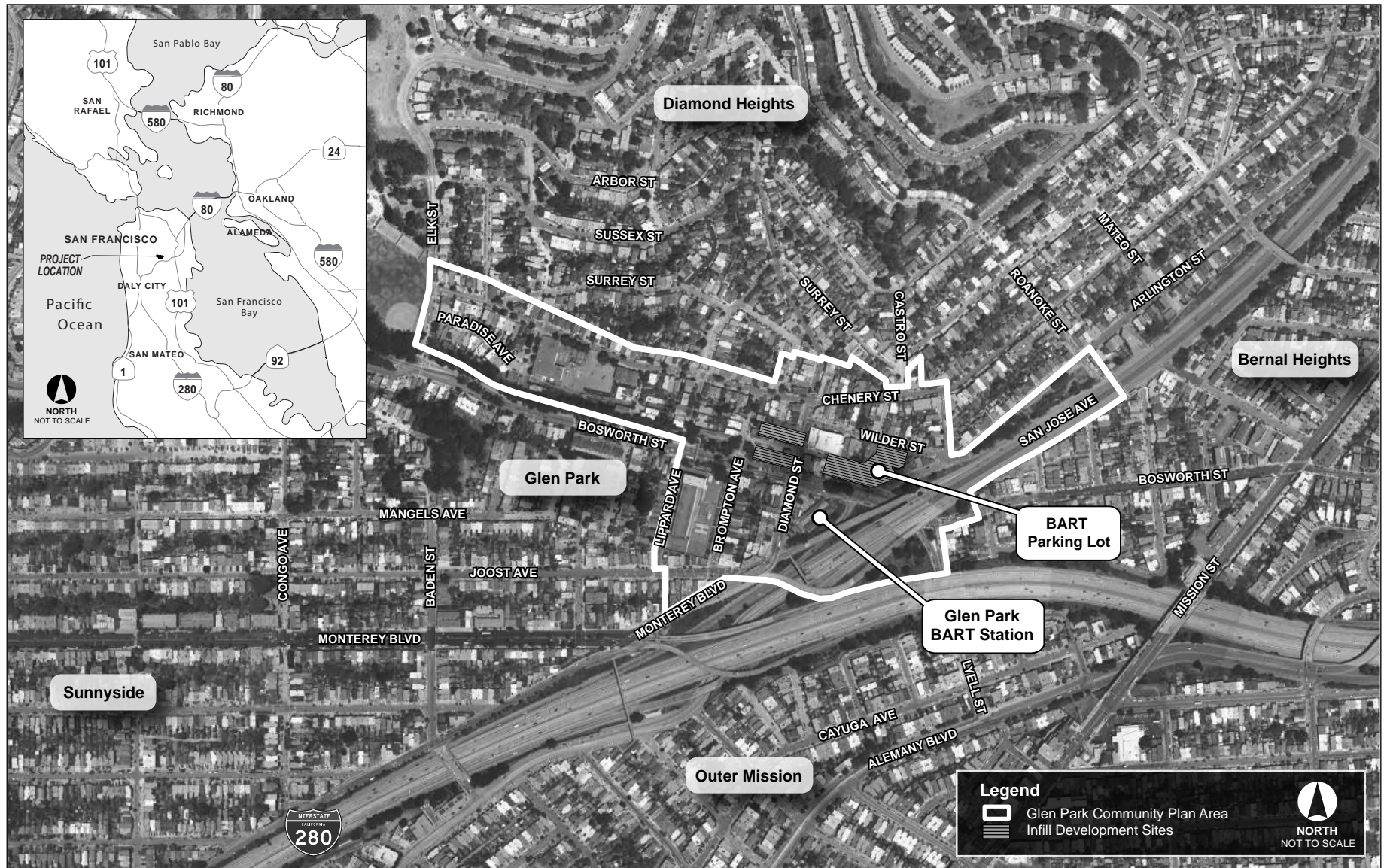
**TABLE V-1
COMPARISON OF SIGNIFICANT IMPACTS OF THE PROJECT TO ALTERNATIVES B AND C**

Proposed Project	Alternative B - Reduced Development - High Residential/Low Retail Development	Alternative C - Reduced Development - Hybrid Mix
Description Northwest Corner of Diamond Street and Bosworth Street Up to 47 residential units Up to 8,582 gsf ground-floor commercial Up to 26 private parking spaces BART Parking Lot Up to 90 residential units 0 to 14,913 gsf commercial uses Up to 123 private parking spaces Other Development 13 residential units <u>5,250 gsf ground-floor commercial</u> Proposed Transportation Improvements Traffic Calming Bicycle Networks Pedestrian Access Transit Improvements	Northwest Corner of Diamond Street and Bosworth Street Up to 10 residential units Up to 1,000 gsf ground-floor commercial Up to 11 private parking spaces BART Parking Lot Up to 31 residential units Up to 2,000 gsf commercial uses Up to 33 private parking spaces Other Development 13 residential units <u>5,250 gsf ground-floor commercial</u> Proposed Transportation Improvements Traffic Calming Bicycle Networks Pedestrian Access Transit Improvements	Northwest Corner of Diamond Street and Bosworth Street Up to 15 residential units No ground-floor commercial Up to 15 private parking spaces BART Parking Lot 19 residential units Up to 5,000 gsf commercial uses Up to 22 private parking spaces Other Development 13 residential units <u>5,250 gsf ground-floor commercial</u> Proposed Transportation Improvements Traffic Calming Bicycle Networks Pedestrian Access Transit Improvements

Nine figures have been revised to update the plan area boundary to include 3121-3125 Castro Street and the fronting street and intersection. These figures include:

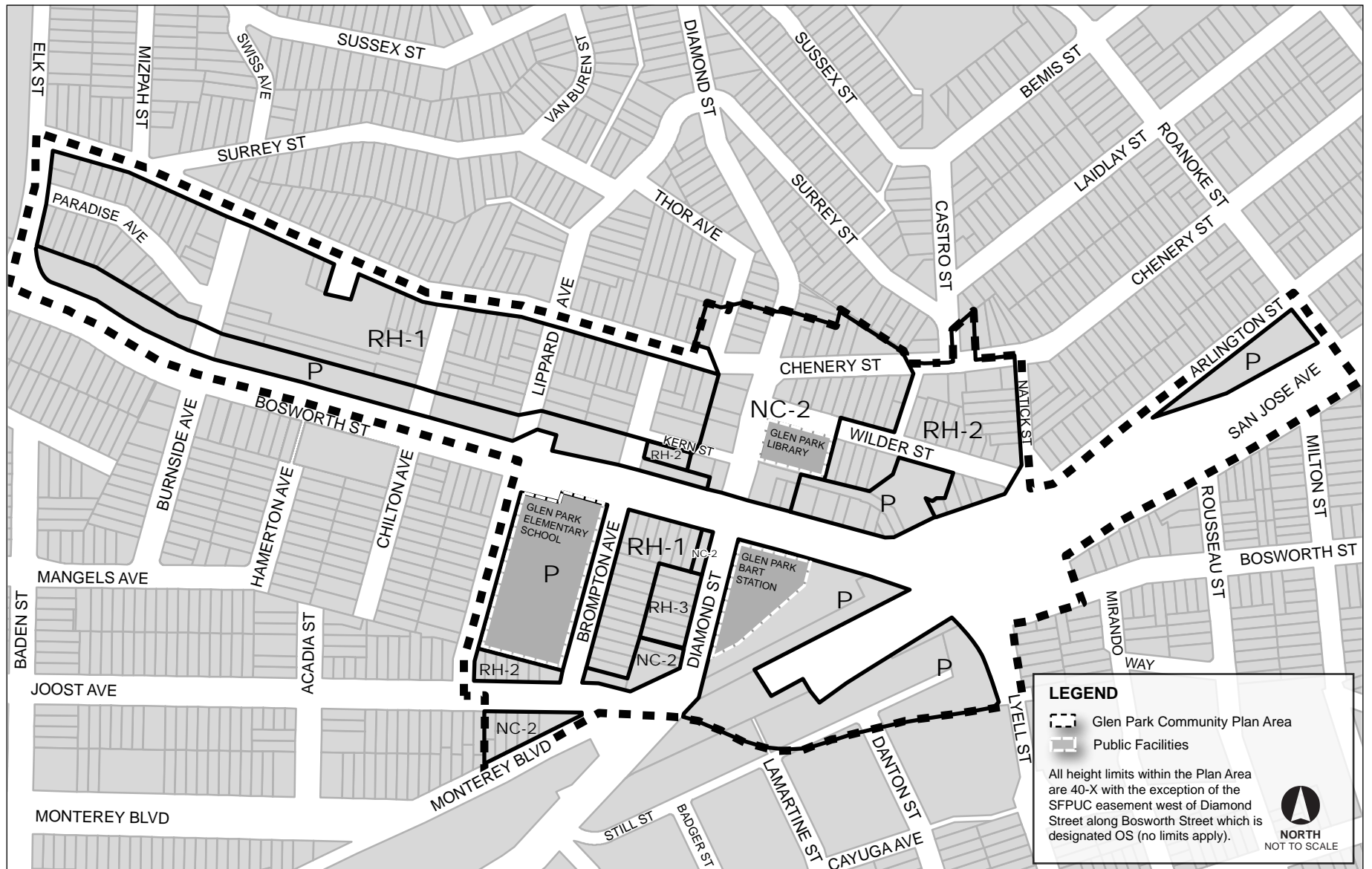
- Figure II-1, p. II-7, Regional and City Project Location
- Figure II-2, p. II-10, Existing Use Districts and Height Limits
- Figure II-3, p. II-14, Use Districts and Height Limits Under the Proposed Project
- Figure II-4, p. II-23, Transportation Improvement Locations
- Figure III.B-1, p. III.B-16, Cumulative Projects for Glen Park Community Plan
- Figure III.D-1, p. III.D-13, Existing Historical Resources with the Plan Area
- Figure III.E-2, p. III.E-10, Existing Transit Network
- Figure III.E-3, p. III.E-19, Existing Bicycle Conditions
- Figure III.F-1, p. III.F-8, Noise Monitoring Locations

Revisions to Figure III.D-1, p. III.D-13, were also made to reflect that 3121-3125 Castro Street was surveyed by the Planning Department.



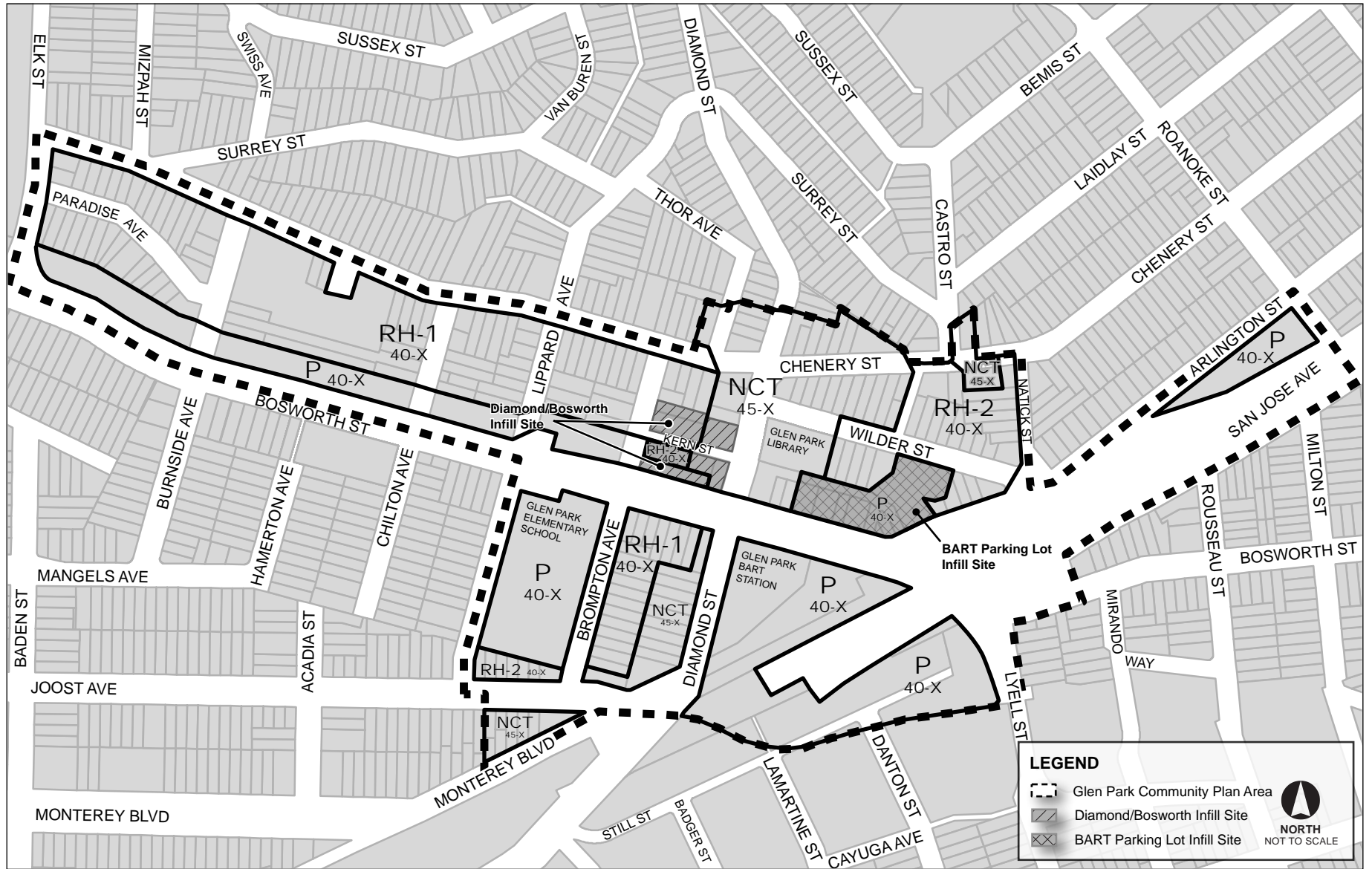
SOURCE: PBS&J, 2009.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-5 (REVISED FIGURE II-1): REGIONAL AND CITY PROJECT LOCATION



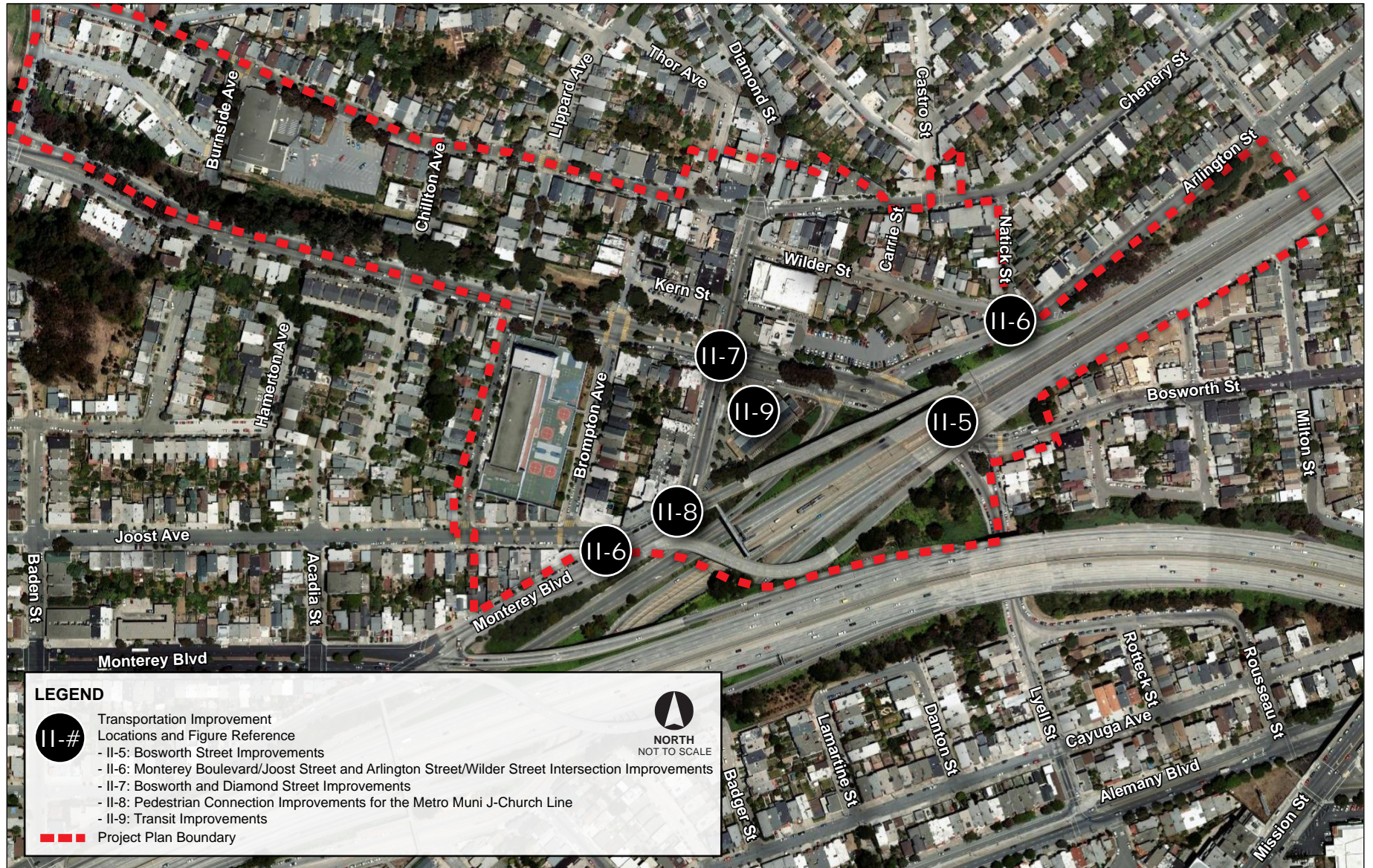
SOURCE: PBS&J, 2009.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-6 (REVISED FIGURE II-2): EXISTING USE DISTRICTS AND HEIGHT LIMITS



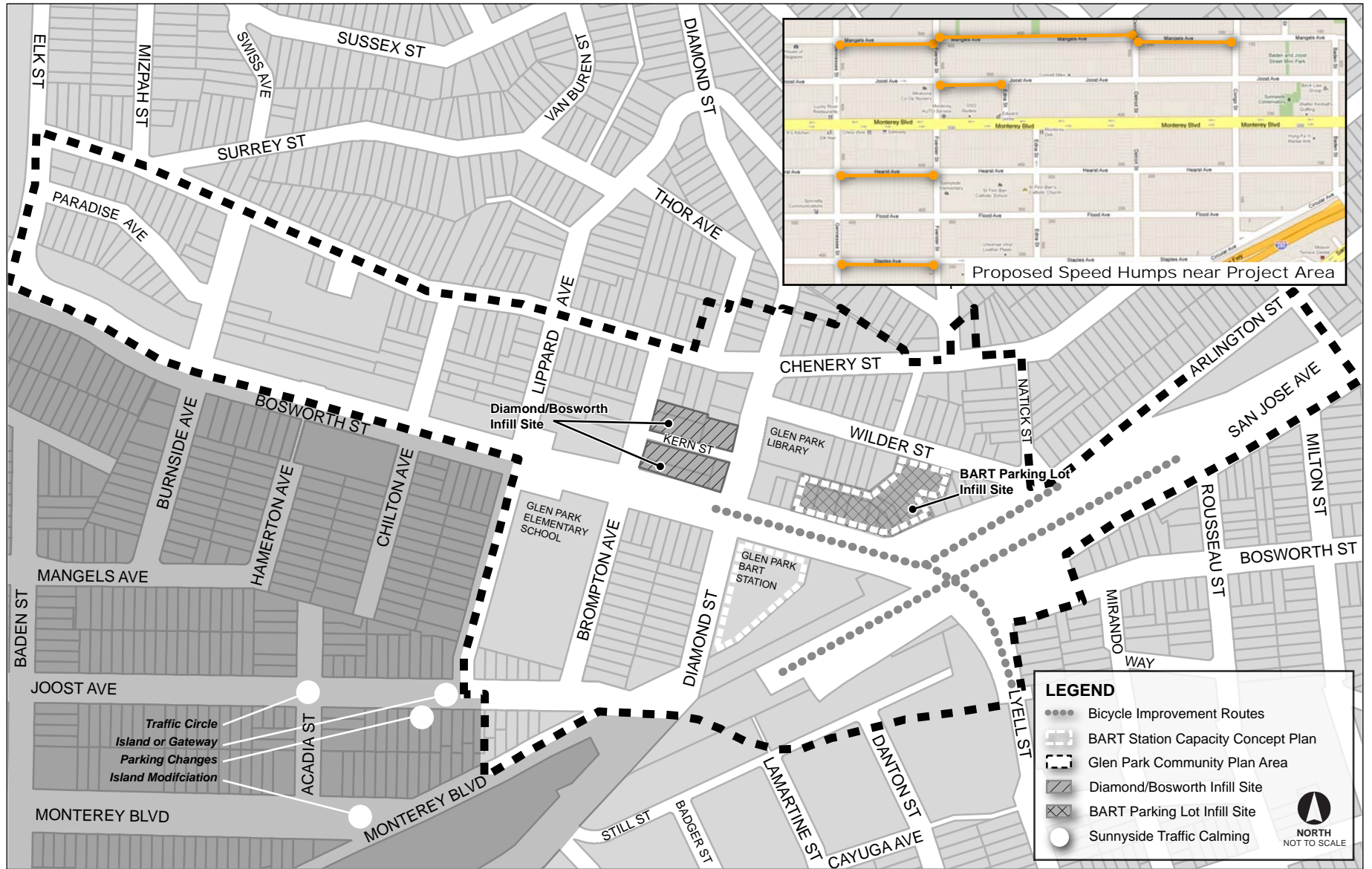
SOURCE: PBS&J, 2009.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-7 (REVISED FIGURE II-3): USE DISTRICTS AND HEIGHT LIMITS UNDER THE PROPOSED PROJECT



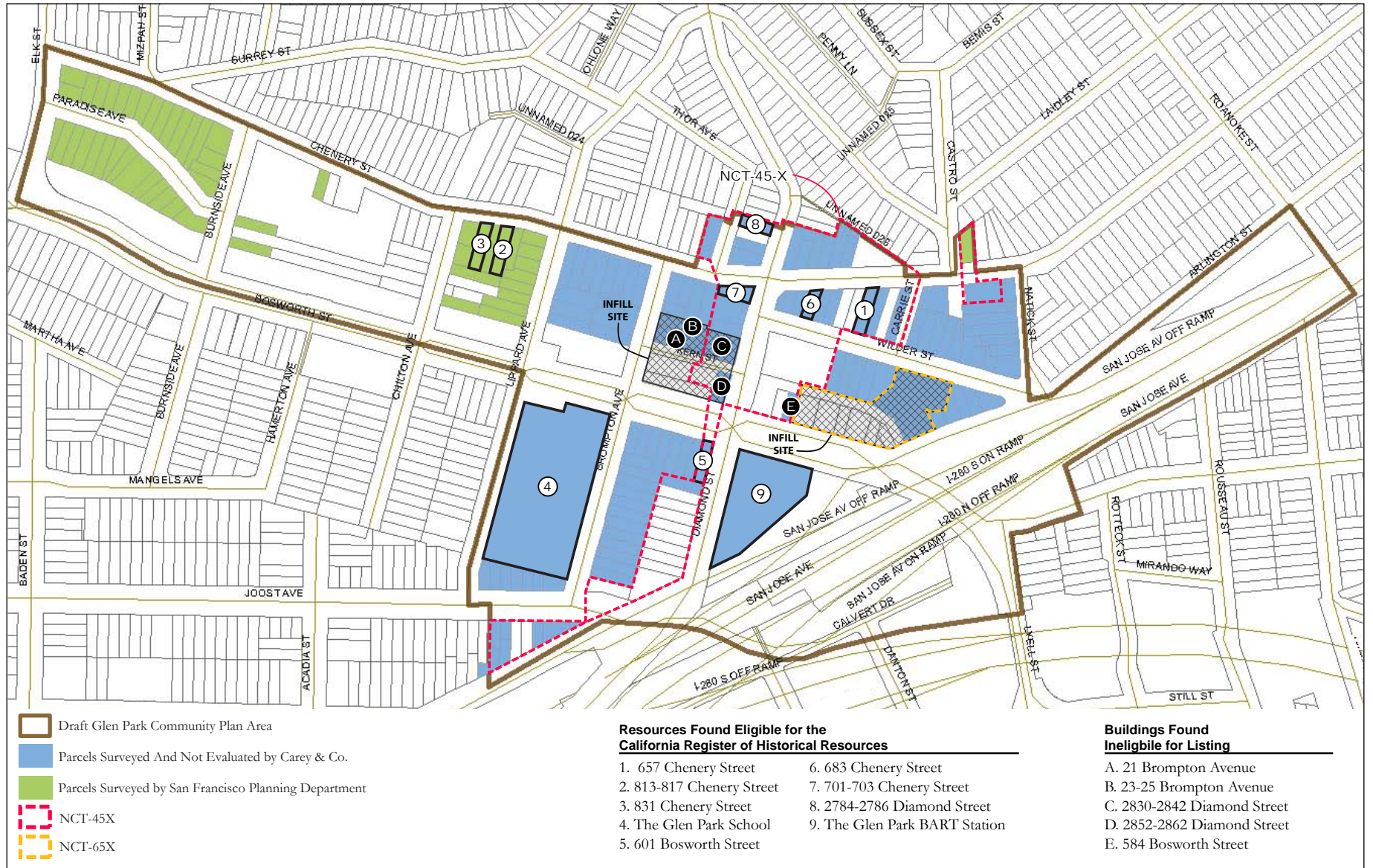
SOURCE: PBS&J, 2010.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-8 (REVISED FIGURE II-4): TRANSPORTATION IMPROVEMENT LOCATIONS



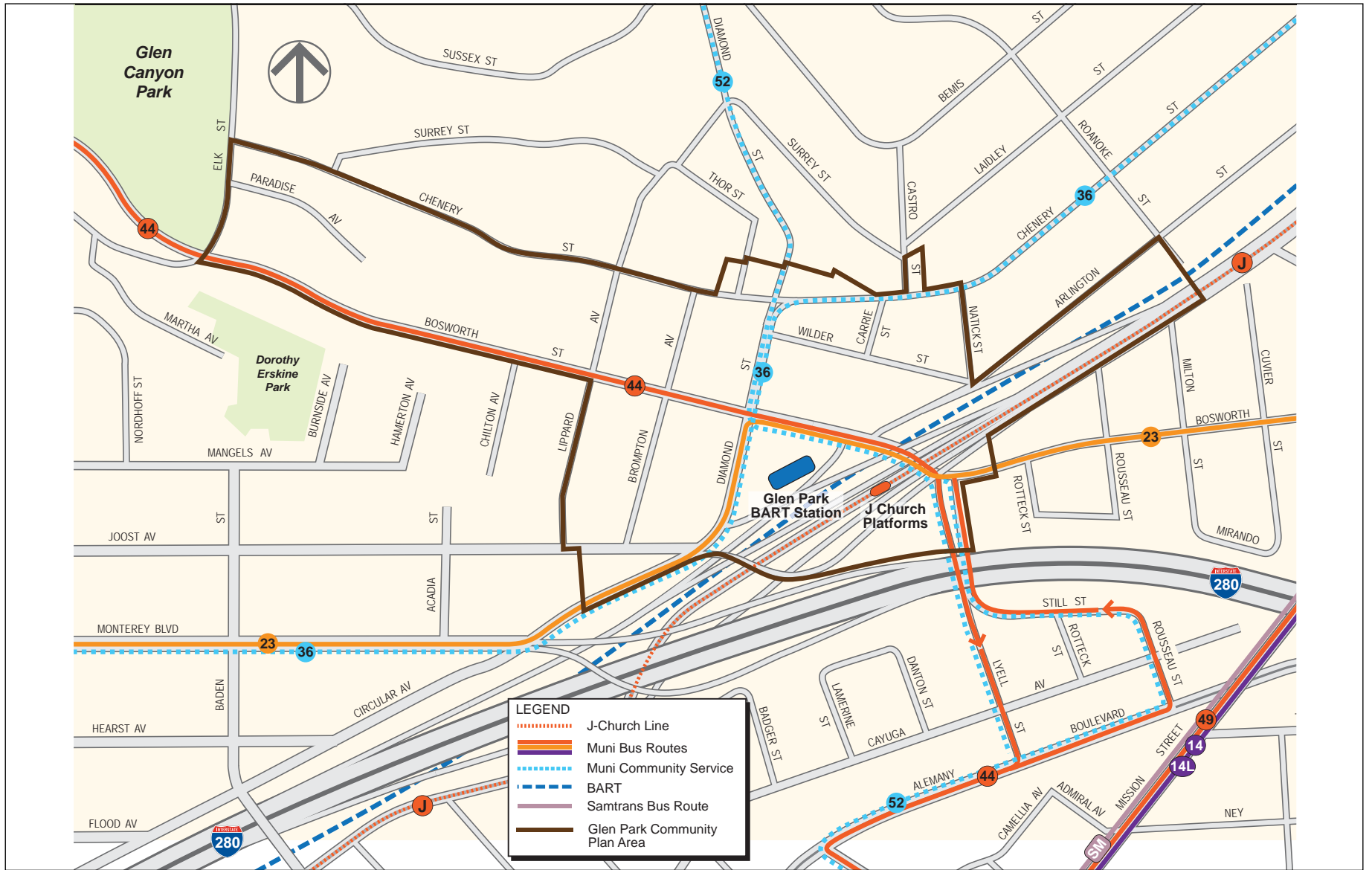
SOURCE: PBS&J, 2009.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-9 (REVISED FIGURE III.B-1): CUMULATIVE PROJECTS FOR GLEN PARK COMMUNITY PLAN



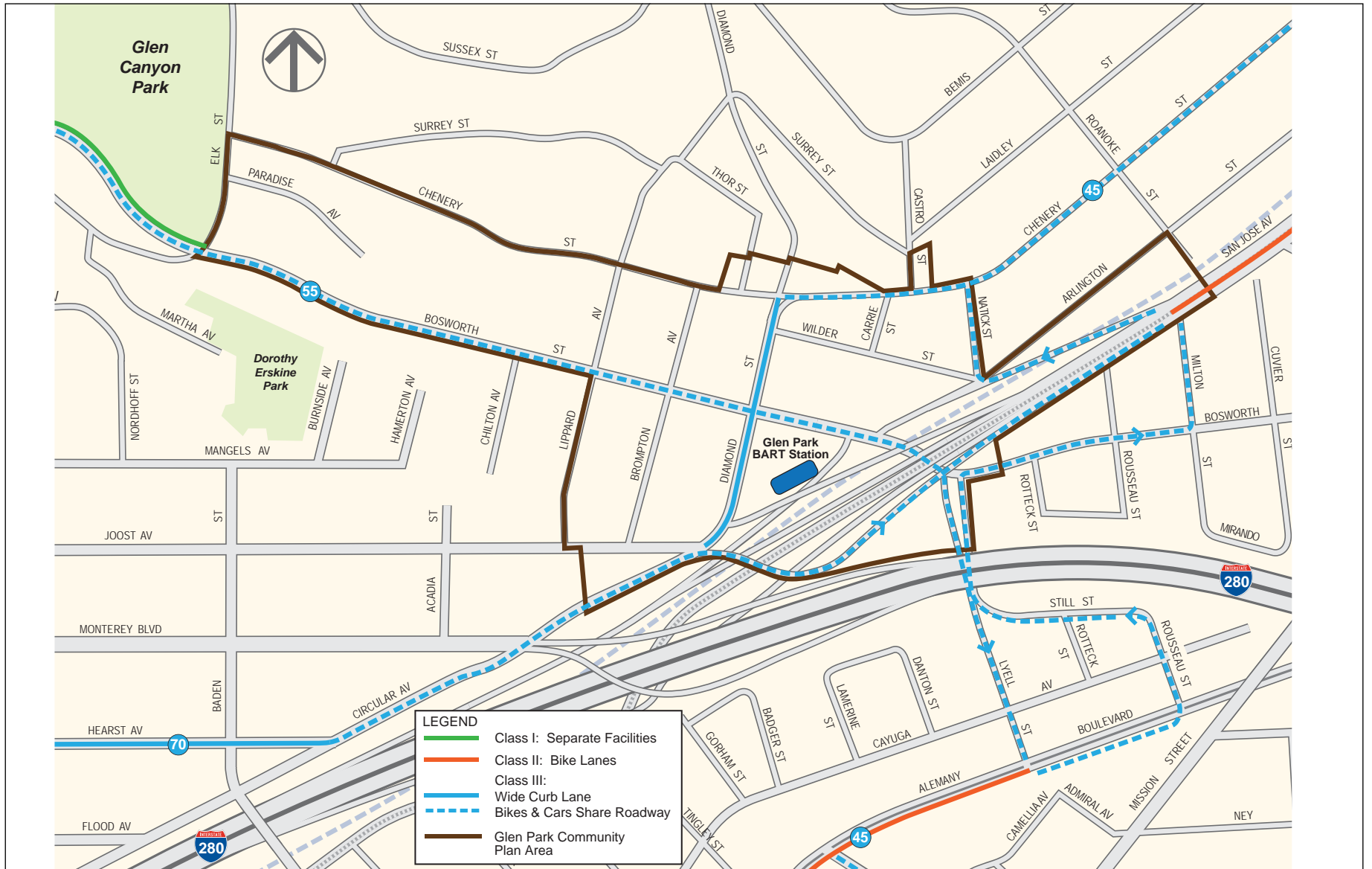
SOURCE: PBS&J, 2010; Carey and Co., 2010.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-10 (REVISED FIGURE III.D-1): EXISTING HISTORICAL RESOURCES WITHIN THE PLAN AREA



SOURCE: AECOM, 2010.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-11 (REVISED FIGURE III.E-2): EXISTING TRANSIT NETWORK



SOURCE: AECOM, 2010.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-12 (REVISED FIGURE III.E-3): EXISTING BICYCLE CONDITIONS



SOURCE: PBS&J, 2010.

GLEN PARK COMMUNITY PLAN
FIGURE C&R-13 (REVISED FIGURE III.F-1): NOISE MONITORING LOCATIONS

APPENDICES

APPENDIX 1
COMMENT LETTERS



JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



RECEIVED

June 13, 2011

JUN 14 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Lisa Gibson
City and County of San Francisco, Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Glen Park Community Plan
SCH#: 2009072013

Dear Lisa Gibson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 10, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

GC-1

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2009072013
Project Title Glen Park Community Plan
Lead Agency San Francisco, City and County of

Type EIR Draft EIR
Description The Glen Park Community Plan - Working Draft for Community Discussion (2010 Community Plan) introduces goals, objectives, and policies aimed at preserving and enhancing the unique character of Glen Park. The plan contains three elements; Land use and Urban Design, Transportation, and Open Space. The plan area is bounded generally by Chenery Street to the north, Roanoke Street to the east, San Jose Avenue and Bosworth Street to the south, and Elk Street to the west. Upon adoption by the San Francisco Planning Commission and Board of Supervisors, the 2010 Community Plan would be incorporated into the San Francisco General Plan as an area plan.

Lead Agency Contact

Name Lisa Gibson
Agency City and County of San Francisco, Planning Department
Phone (415) 575-9032 **Fax**
email
Address 1650 Mission Street, Suite 400
City San Francisco **State** CA **Zip** 94103

Project Location

County San Francisco
City San Francisco
Region
Lat / Long
Cross Streets Chenery St., Roanoke St., San Jose Ave., Bosworth St. & Elk St.
Parcel No. Accessors Blocks 6745 & 6744
Township 2S **Range** 5W **Section** 29NE **Base** MDB&M

Proximity to:

Highways I-280, U.S. 101
Airports No
Railways Caltrain ROW
Waterways Islais Creek
Schools Multiple
Land Use NC-2 (Small-Scale Neighborhood Commercial); P (Public); RH-1 (Residential-House District, One Family); RH-2 (Residential House District, Two Family)

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Noise; Traffic/Circulation; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 04/27/2011 **Start of Review** 04/27/2011 **End of Review** 06/10/2011

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5541
FAX (510) 286-5559
TTY 711



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Be energy efficient!*

clear
6/10/11
P

RECEIVED
JUN 07 2011
STATE CLEARING HOUSE

SF280141
SF-280-R2.7
SCH#2009072013

June 7, 2011

Ms. Lisa Gibson
City and County of San Francisco
Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Ms. Gibson:

Glen Park Community Plan – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Glen Park Community Plan. The following comments are based on the Draft Environmental Impact Report.

Proposed BART Station Bus-Loop Improvement

Due to the short distance between the entrance into the proposed Bus Loop and the realigned Interstate (I) 280 southbound on-ramp, the improvement may cause confusion to drivers. Please provide appropriate signage to direct drivers.

TR-5

The proposed Bus Loop will violate the curb return distance requirement of minimum 400 feet required under the Highway Design Manual Section 504.3(3). As a result, a Design Exemption would be required from the Department.

The realignment of the southbound I-280 would require extensive work within State right-of-way, we recommend the City to coordinate with the Department as soon as funding and plans are available. A Transportation Management Plan may also be necessary if detours and closures are required.

Roundabout Variant

TR-7

On page II-25, it is important to note that any queuing on the I-280 southbound on-ramp will reduce the roundabout's capacity since it would affect other movements that otherwise would not be impacted by signalization.

Additional Improvements

PD-4

In addition to the intersection analyzed, the Department recommends analyzing and proposing improvements to the Monterey Avenue/Circular Avenue/I-280 off-ramp intersection in a future phase of the Glen Park Community Plan that might improve transit and vehicular operations within the area.

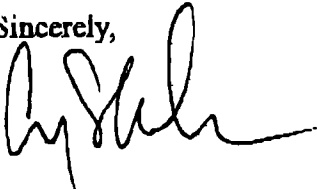
Ms. Lisa Gibson/City and County of San Francisco

June 7, 2011

Page 2

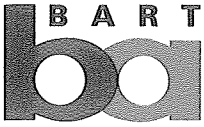
Should you have any questions regarding this letter, please call Yaiman Kwan of my staff at (510) 622-1670.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Arnold". The signature is fluid and cursive, with a long horizontal stroke at the end.

GARY ARNOLD
District Branch Chief
Federal Grants / Rail Coordination

c: State Clearinghouse



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688
(510) 464-6000

2011

June 13, 2011

Bob Franklin
PRESIDENT

John McPartland
VICE PRESIDENT

Dorothy W. Dugger
GENERAL MANAGER

Mr. Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103.

DIRECTORS

Gail Murray
1ST DISTRICT

Joel Keller
2ND DISTRICT

Bob Franklin
3RD DISTRICT

Robert Raburn
4TH DISTRICT

John McPartland
5TH DISTRICT

Thomas M. Blalock, P.E.
6TH DISTRICT

Lynette Sweet
7TH DISTRICT

James Fang
8TH DISTRICT

Tom Radulovich
9TH DISTRICT

RE: Draft Environmental Impact Report for Glen Park Community Plan (Planning Department Case No. 2005.1004, State Clearinghouse No. 2009072013)

Mr. Wycko:

This letter provides the comments of the San Francisco Bay Area Rapid Transit District ("BART") on the draft environmental impact report ("draft EIR") prepared for the Glen Park Community Plan pursuant to the California Environmental Quality Act ("CEQA").¹ The draft EIR studies the potential environmental effects associated with the adoption of the 2010 Community Plan for the Glen Park neighborhood, in particular related to land use and urban design, transportation improvements, and creation of open space. As particularly relevant to BART, the draft EIR analyzes the potential environmental effects of allowing mixed commercial and residential infill development on the BART parking lot currently serving BART's Glen Park Station. The draft EIR considers a maximum build-out scenario of 90 residential units, 14,913 square feet of commercial space, and 123 parking spaces.

GC-7

BART appreciates the City's efforts in preparing the 2010 Community Plan and the draft EIR, as well as the opportunity to comment on the draft EIR. BART believes the City has done an excellent job in preparing the draft EIR and creating a vision for the Glen Park neighborhood that includes a strong transit-oriented development ("TOD") opportunity for the BART parking lot. To this end, BART's comments on the draft EIR do not concern any alleged inadequacies with the environmental analysis. To the contrary, BART believes the draft EIR is legally adequate for purposes of adopting the 2010 Community Plan and supporting future TOD in the Glen Park neighborhood.

¹ Cal. Pub. Res. Code § 21000 et. seq. CEQA is implemented through the State CEQA Guidelines ("Guidelines"), 14 Cal. Code Regs. § 15000 et seq.

GC-7
Con't

Instead, BART's comments focus on three policy determinations the City has made in the draft EIR concerning (i) the modeling of trip generation and transportation mode splits for TOD projects considered in the Plan, (ii) the significance criteria used for assessing the 2010 Community Plan's impacts on BART service, and (iii) the identification of the BART's Glen Park Station as an historic resource that might be effected by implementation of the 2010 Community Plan. BART recognizes that the City, as the CEQA lead agency for the draft EIR, has the discretion to establish the methodology for analyzing, and the criteria for assessing the significance of, the environmental effects of the 2010 Community Plan, provided the methodology and significance criteria are supported by substantial evidence. The City also has discretion to identify the significant effects of the 2010 Community Plan, again subject to support by substantial evidence in the record. As noted in its comments below, BART does not question the City's exercise of discretion, or the sufficiency of the evidence supporting such exercise, in these areas.

Rather, the sole purpose of these comments is to recognize that, while the methodology, significance criteria, and assumptions used in the draft EIR may be appropriate for purposes of assessing the impacts of the 2010 Community Plan, the same methodology, criteria and assumptions might not be appropriate for other projects, including particularly projects for which BART might act as the lead agency. BART therefore is going on record here concerning these issues in order to reserve the right to exercise its discretion on these and other issues in manner different than, and perhaps even directly contrary to, the City's determinations in the draft EIR, subject, as with all discretionary determinations, to support by substantial evidence.

We turn now to our specific comments on the draft EIR.

Comment 1: Trip Generation and Mode Split Methodology.

TR-2

Table III.E-6 of the draft EIR sets forth the "Person Trip Generation for Plan Area Buildout" and concludes that the 92 residential units planned for the BART parking lot would result in 920 weekday daily trips, and the 14,913 square feet of retail space would result in 2,238 weekday daily trips. Initially, BART notes that, while it understands the City's decision to utilize a conservative approach to analysis which assumes the maximum buildout of both the residential and retail components of the BART parking lot, it is highly unlikely that both the residential and retail components will be builtout to the maximum scenario. More importantly, BART believes the trip generation methodology used in the draft EIR is very conservative, such that it overstates the amount of trips that will result

TR-2
Con't

from a TOD project on the BART parking lot. BART's experience with other TOD projects on its property indicates that the City's trip generation methodology may be overstating the number of trips that would be generated by a factor of three. This may result in part from an assumption that the retail component of the TOD project would generate trips at a rate similar to a suburban strip center rather than as an incidental, infill retail service in an established urban area. Similarly, the mode split information presented in Table III.E-7 makes certain assumptions different than BART has made for similar TOD projects. BART believes that residential trips should first be divided between work and non-work before any mode splits are applied. BART typically uses 25/75 percent work/non-work in undertaking this analysis.

As noted above, we do not question the City's discretion to use the more conservative trip generation and mode split methodology for purposes of assessing impacts. BART notes, however, that it has used and will continue to use different, less conservative methodologies for other TOD projects on its property.

Comment 2: Significance Criteria for Transit Impacts.

TR-1

The draft EIR uses the City's *Transportation Impact Analysis Guidelines for Environmental Review* ("SF Guidelines") for purposes of establishing thresholds of significance for impacts on transit services. The SF Guidelines provide that a project will result in an impact on BART service if the project will add riders so as to cause BART trains to exceed 135% capacity utilization threshold during peak hours. The draft EIR then concludes that implementation of the 2010 Community Plan, including the anticipated TOD project on the BART parking lot, would not add sufficient riders to BART to trigger this threshold. BART acknowledges that, as lead agency for purposes of the 2010 Community Plan, the City has discretion to use the 135% utilization threshold of significance, and that the analysis and conclusion regarding impacts to BART service is supported by substantial evidence.

BART notes, however, that, while the City has discretion to establish the threshold of significance to be used for its projects, and that the 135% capacity utilization threshold appears to be supported by substantial evidence, BART does not necessarily agree that the 135% capacity utilization is the appropriate threshold of significance for all BART projects, including other BART TOD projects. BART reserves its discretion to utilize different thresholds of significance for future projects, or to establish generally applicable thresholds of

TR-1 ↑ significance pursuant to CEQA Guidelines § 15064.7, provided such thresholds
Con't ■ are supported by substantial evidence.

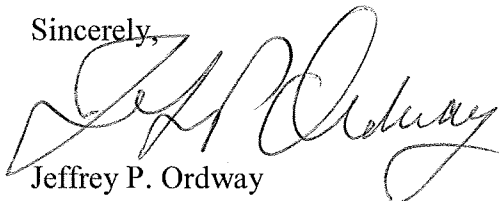
Comment 3: Treatment of BART's Glen Park Station as an Historic Structure.

CP-1 The draft EIR concludes that the Glen Park BART Station is likely eligible for listing on the California Register of Historical Resources under Criterion 3 – Design/Construction. This conclusion is based on a December 21, 2010 *Historic Resources Evaluation, Draft Glen Park Community Plan, San Francisco, California* prepared by Carey & Co., Inc. Based on this determination, the draft EIR identifies several potentially significant environmental effects that would result from implementation of the 2010 Community Plan, and proposes mitigation measures that lessen these potential impacts to less-than significant. As with the draft EIR's treatment of potential impacts to BART's transit service, BART believes the analysis and conclusion in the draft EIR concerning potential impacts to BART's Glen Park Station are supported by substantial evidence.

However, BART does not necessarily agree that the entirety of the Glen Park Station is eligible for listing on the California Register as concluded in the Carey & Co. evaluation. While BART recognizes that some individual components of the BART station may have some architectural significance, and while BART is committed to preserving the historic resources within its ownership and control, the Carey & Co. evaluations conclusion that the entire Glen Park Station, including the plaza, is an historic resource seems overly broad. BART reserves the right to undertake a future historic resources evaluation of the Glen Park Station and, depending on the results of such evaluation, reach a different determination regarding the Glen Park Station's eligibility for listing on the California Register, when and if BART undertakes any independent projects involving the Glen Park Station.

Thank you again for the opportunity to comment on the draft EIR. If you have any questions concerning our comments, please contact me at (510) 464-6114.

Sincerely,



Jeffrey P. Ordway
Manager of Property Development



SAN FRANCISCO PLANNING DEPARTMENT

May 24, 2011

Mr. Bill Wycko
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 Mr. Wycko,

On May 18, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Glen Park Community Plan. After discussion, the HPC arrived at the comments below:

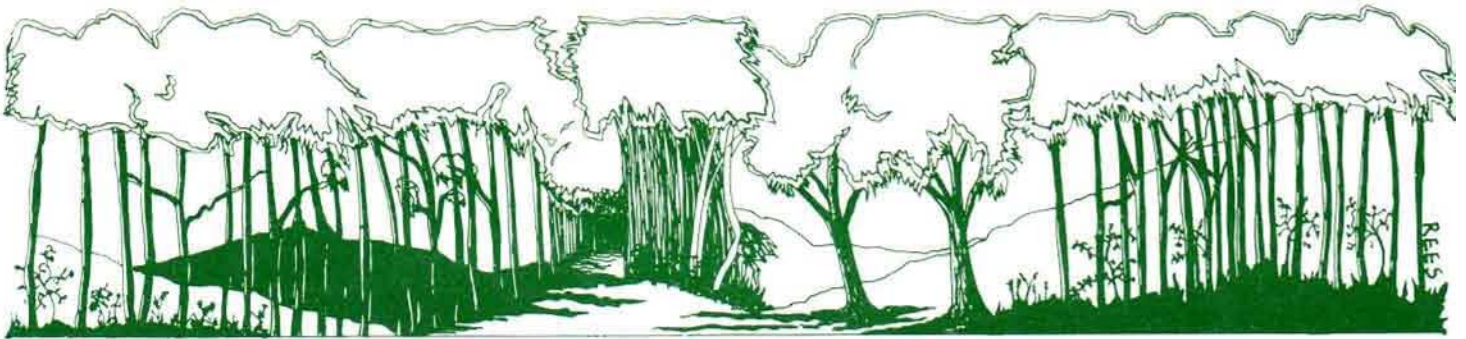
CP-1

- The HPC concurs with the findings on the properties identified as eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources, and as City Landmarks.
- The HPC suggests further clarification for M-CP-1 (Page III.D-30) to ensure review for SOI (Secretary of the Interior's) Standard compliance be conducted by Preservation Staff of the Planning Department

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

Sincerely,

Charles Edwin Chase, President
Historic Preservation Commission



The GLEN PARK ASSOCIATION

June 13, 2011

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Via e-mail only to: bill.wycko@sfgov.org
lisa.gibson@sfgov.org

RE: Glen Park Community Plan Draft Environmental Impact Report - Case No. 2005.1004E

The Glen Park Association's Board of Directors has reviewed the Glen Park Community Plan Draft Environmental Impact Report (EIR) published by the San Francisco Planning Department. We appreciate the department's efforts towards preparing the Community Plan and the analysis presented in the Draft EIR. We submit the following comments for your consideration.

This letter is divided into two sections, including a section of comments on the adequacy of the analysis in the EIR pursuant to the requirements of the California Environmental Quality Act (CEQA), as well as a section presenting views and suggestions on particular aspects of the Glen Park Community Plan. While the latter section of comments may not specifically relate to the CEQA analysis, they are presented for consideration by the Planning Department to refine the Community Plan before its adoption. Please note that the GPA board and membership may have further comments on the Plan during the adoption process.

COMMENTS ON THE DEIR

AESTHETICS

Visual Impacts of New Height Limits

The proposed Land Use and Planning Code Amendments, summarized on DEIR Table II-1, p. II-3 and DEIR p. II-13 include increasing the 40-X height limit by 5 feet to allow for increased ceiling heights on ground floors in the new Glen Park Neighborhood Commercial Transit (Glen Park NCT) District. DEIR Section III.C, Aesthetics, presents visual simulations (mass and bulk), an analysis of the effects of the new height limit, pp. III.C-7 to II.C-17, and concludes that the impacts on visual character would be "less than significant."

AE-1

Glen Park is a small-scale neighborhood. Most buildings in the village core are approximately 30 feet or less in height. The EIR should address the effects of the proposed zoning in comparison with existing building heights. It is our view that the proposed zoning change could have a potentially significant impact on visual character. To minimize potentially significant visual impacts, we recommend that the Final EIR include mitigation measures that define design guidelines to reduce aesthetic impacts of new buildings

taller than the existing pattern in Glen Park. These design guidelines should include, but may not be limited to, set-backs above the second floor of new buildings so that the bulk of buildings above 25 feet is reduced as viewed from the street.

The construction of buildings that take maximum advantage of height limits on available in-fill lots could also have significant aesthetic impacts on neighboring residential lots whose yards or homes could abut essentially a 45-foot tall wall. We also recommend that the aforementioned design guidelines take into account the bulk of 45 foot structures on other frontages and limit the visual impacts through additional design guidelines.

We recognize that the 5-foot incremental increase in height in the NCT zoning is intended to improve retail viability and pedestrian access to street-level businesses. The sidewalks in Glen Park's business district are currently insufficient for pedestrian access to businesses. We recommend that the design guidelines for new in-fill development also include street-level setbacks on Diamond Street and Bosworth Street so that new sidewalks would be at least 12 feet wide to improve both the appearance and the functionality of the space in front of new buildings.

AE-1
Con't

Visual Impacts of BART Lot Development

Section III.C includes an analysis of a hypothetical "worst-case scenario" of up to 65 foot tall development on the BART lot as shown in Figures II.C-5 and III.C-6. Given that development of up to 45 feet could potentially have a significant visual impact, we believe that the impact of a 65 foot building on the BART lot would not be "less than significant," and we recommend that the DEIR Chapter V. analyze explicitly the impacts of a 45 foot high building on that site.

Given that the new zoning (Glen Park NCT) height limit is proposed at 45 feet, the EIR should consider a 45 foot alternative for the BART lot. While EIR Alternatives B and C include reduced development alternatives, the alternatives do not address height limits for the BART site. The DEIR does not include an alternative that considers the impacts of a 45-foot high building on the BART site

Consistent with previous comments regarding design guidelines for in-fill development taller than the existing buildings, the DEIR should identify mitigation with design guidelines for the BART site to minimize visual impacts of bulk or box-type development that would be out of character with the existing development and feel of the village core. Setbacks on Bosworth Street should also insure at least 12-foot wide sidewalks.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Historic Resources

DEIR Section III.D. Cultural and Paleontological Resources, reports that the Glen Park BART Station is recognized for its architectural significance and appears to be eligible for listing on the California Register of Historic Places and as a City Landmark (DEIR p. III.D-12). The proposed Community Plan Transportation Improvements include options and variants that would require parts of the BART Station to be modified in order for it to serve its purposes as a rail station at an intermodal transit point. The DEIR further concludes that the potential J-Church connections and the bus loop would, in a conservative analysis, have a significant adverse effect on this historic resource.

CP-1

The DEIR lists elements of the station and the plaza as contributory to qualifications for the California Register (DEIR Section III.D-12). The circular plaza sitting area at the corner of Bosworth and Diamond Streets, labeled as a "courtyard" in the EIR, is identified as one of the character defining features of the station's architecture and history.

The record of development of the Glen Park Station shows that the circular plaza at Diamond and Bosworth was designed and completed after the rest of the station. The design and materials differ from the features of the main elements of the station. Therefore, the evaluation of the BART station in Section III.D should

CP-1
Con't

be revised to state that the circular plaza is not one of its character-defining features. Attached to this letter are plans and records that document the status of the circular plaza.

We note that the Widening of Diamond Street - Variant, DEIR p. II-27, shown in Figure II-7, would require reconfiguration of part of the BART plaza. The DEIR does not appear to address whether the Variant would have an adverse effect on the defining features of the BART station. On the basis of the documents noted above, the EIR should conclude that the alteration of the plaza area to implement the Variant or any other changes to the plaza, would not adversely affect a character-defining feature of the BART station as an historic resource, and the BART station would retain its integrity as a resource eligible for the California Register

Overall, we recommend that the EIR address the necessity of finding a balance between the maintenance or enhancement of the functionality of the BART Station and the preservation of its defining design features. Because the BART station is a large site with a number of character-defining features, the EIR should discuss more completely how future changes, required to improve the functionality of the transit system in general, and the Glen Park Station in particular, would be evaluated in terms of historic resources. Changes in one part of the station could result in a conclusion that the remainder of the station, with its architectural design and materials, still possess sufficient integrity such that the site as a whole would maintain its eligibility for the California Register of Historic Resources.

CP-2

Paleontological Resources

The mitigation measure presented on pages III.D-41 seems inconsistent with the analysis and too onerous for the very limited potential for occurrence of fossils, which could unnecessarily add costs to new development. Radiolarians are fairly common in the chert in this region and would likely be out of context in the village. We recommend removal of this mitigation measure.

TRANSPORTATION

DEIR Section III.E presents an extensive analysis of the potential effects on traffic, transit, pedestrian, bicycle, and parking conditions from implementation of the Community Plan. The content appears to be generally complete and adequate; however, we have the following specific comments.

TR-4

Bosworth Street Improvements

The EIR evaluates the effects of the proposed improvements to Bosworth Street at its intersections with Arlington and Lyell Streets (DEIR pp. II.E-52 to III.E-56). This section of Bosworth is also part of a designated Bicycle Route in addition to being heavily used by pedestrians. The EIR should evaluate the impacts of the proposed improvements (roundabout or speed tables) on pedestrian and bicycle safety. It is not clear how bicycle movements through the Arlington intersection would be routed without conflicts with vehicle traffic.

PD-3

Other Changes on Bosworth Street

The DEIR does not evaluate certain changes in Bosworth Street that could meet transportation goals, provide open space improvements, and address parking concerns. The EIR should analyze reconfiguration of Bosworth Street. Bosworth Street is one travel lane in each direction east of Arlington, two travel lanes between Arlington and Elk, and then becomes O'Shaughnessy with one lane in each direction. The Community Plan should consider re-configuring Bosworth Street between Diamond and Elk to one westbound lane. Turning lanes and bus stop space should be retained as needed. The right-of-way change should provide a 15-foot wider, more level open space corridor contiguous with the existing steeply sloped green space on the north side of Bosworth Street. In addition, diagonal parking on the north side of Bosworth between Diamond and Lippard may be feasible, and would increase the number of short-term spaces available to visitors to the center of Glen Park. The wider open space would continue west of Lippard. If diagonal parking were not feasible, the open space corridor would extend to Diamond. While the EIR must analyze the traffic operations effects of this change, the reduced lanes and diagonal parking could have a traffic-calming effect on this artery.

■ **BART Station Bus Loop**

The design proposal described in the EIR is difficult to understand. How would non-BART passengers using the bus loop platform access nearby streets? Would the BART fare gates need to be moved or new gates added on the bus platform? How does the bus loop support bus transfers among the 44 and 52 lines and the 23, 35, and 36 lines on the loop? While street crossings would be somewhat reduced, the route through the BART station would add distance for pedestrians to travel to reach the buses, which could contribute to pedestrian congestion. The 44 line is heavily used by transfer passengers.

TR-5

While it is noted on p. III.E-54 of the DEIR that pedestrian conflicts could occur at the intersection of the proposed bus loop with Bosworth Street and Diamond Streets, we request further analysis of the impacts of the proposed improvements on pedestrian and bicycle safety versus the benefits of the bus loop, including left turns by buses to the loop from Bosworth and from the loop to Diamond.

Does the Bosworth Street/Diamond Street intersection Level of Service (LOS) analysis take into account the bus loop operation? If not, it should be considered to ensure that the loop would not decrease LOS.

We note that the bus loop involves a 14 percent exit grade. Could this grade constitute a design hazard? We recommend that the EIR discuss the operational aspects of this steep grade and any potential design hazards and include mitigation, if appropriate.

■ **Bosworth Street/Diamond Street Intersection Improvements**

The proposed changes would affect pedestrian, bicycle and automobile circulation (DEIR pp. III.E-38 to III.E-40). However, there is insufficient analysis of the pedestrian safety impacts of the various alternatives. For example, the EIR does not provide sufficient comparative analysis for the assessment of the impacts on pedestrian safety of a right-turn lane from Diamond Street onto Bosworth Street outside of the BART Station. We recommend further analysis to distinguish between the effects of the variants on pedestrian safety.

TR-4

■ **Access to J-Line**

The J-Church access options, DEIR p II-30 and Figure II-8, show circuitous plans. Both plans would appear to conflict with the bus loop plan and the practicality of the plans is questionable. It is difficult to conclude that either would provide a practical improvement to access to the J-Church line, particularly given the physical infrastructure required. We recommend that other alternatives for access to the J-Line be developed and analyzed. We suggest that, as an alternative for analysis, the platforms at the J-Line stop be moved northward along San José Avenue so that the ADA compliant ramp from the platform to the BART station is a straight ramp rather than a switch-back ramp.

TR-6

■ **Alemaný Boulevard Conditions**

The DEIR describes traffic conditions at the Bosworth/Lyell intersection, and the Transportation Improvements include a Variant that would signalize that intersection. This improvement appears to be the right solution for that location. However, the DEIR should address morning and evening peak hour westbound traffic back-ups into the eastbound left lane of Alemany at Rousseau (traffic from Silver). The cross-town route and from Alemany to Bosworth Street along Rousseau, Still and Lyell Streets are not adequately addressed in the DEIR. The actual back-ups occur beyond the boundaries of the plan area but are caused by current controls at the intersection of Lyell and Bosworth. There is no discussion of the positive impacts of the proposed roundabout or traffic light on the current back-up to and into Alemany. The new traffic controls at the intersection of Lyell and Bosworth need to be designed to favor the traffic from Lyell because of the unequal traffic load at that intersection.

TR-3

■ **AIR QUALITY**

■ The corporate shuttle bus use of the BART Station probably impacts air quality. We recognize that the shuttle buses are part of the existing conditions in the project area; however, the Community Plan may

AQ-1

AQ-1
Con't

encourage additional use of corporate shuttle buses. We recommend that the existing air impacts from shuttle buses be separately calculated, as well as general impacts from expanded use of shuttle buses in the future.

Given the baseline air quality in the Glen Park village is poor due to its proximity to Highway 280, Bosworth, and San Jose Avenue, any additional pollutant sources adds to the impacts. The EIR could also consider placing restrictions on the future growth of corporate shuttle bus use and limiting the idling of the buses as part of the mitigation under potential impact AQ-7 on page III.G-34. The measure could also be added to the construction analysis. Limitations on the use and idling of the shuttle buses during construction would also reduce overall air emissions.

DAYLIGHTING OF ISLAIS CREEK

GC-8

The "daylighting" of Islais Creek is noted as being covered at a program level of analysis in the EIR on page II-5; however, the analysis throughout the EIR is sparse and insufficient to inform decision-making about this proposal. The Initial Study identified mitigation to address potential hydrology and water quality impacts, including the preparation of a Hydraulics and Hydrology Study; however, without that study it is unclear as to whether daylighting could have significant unavoidable effects or not. The EIR should have addressed to a more detailed level the aesthetic, geologic, hydrologic, land use, noise, air quality and hazard (e.g., mosquito pathogens) impacts associated with daylighting. Although a specific proposal for daylighting has not been made, enough is known about how it could work to provide more meaningful analysis of both the construction of a daylighted stream and the long-term operational impacts of it. Additional analysis should be presented in the EIR, even though it is only addressed at the program level, in order to adequately frame future project level CEQA analysis, similar to the analysis of the BART lot development.

GENERAL COMMENTS ON THE COMMUNITY PLAN

TRANSPORTATION

We generally support any measures that calm traffic in the Glen Park core.

The Community Plan, as analyzed in the EIR, shows many instances where the safety of pedestrians and bicyclists is weighed against the speed of automobile traffic through the neighborhood. We support the measures that improve pedestrian and bicycle safety and access even if they result in slower speeds for automobiles. Level of service for automobiles is less important than pedestrian safety in Glen Park.

PD-3

The Plan should include certain changes on Bosworth Street that would meet Transportation goals, open space improvements, and possible parking changes. The Community Plan should consider re-configuring Bosworth Street between Diamond and Elk to one westbound lane. Turning lanes, and bus stop space should be retained as needed. The right-of-way change should provide a 15-foot wider, more level open space corridor contiguous with the existing steeply sloped green space on the north side of Bosworth Street. In addition, diagonal parking on the north side of Bosworth between Diamond and Lippard may be feasible, and would increase the number of short-term spaces available to visitors to the center of Glen Park. The wider open space would continue west of Lippard. If diagonal parking were not feasible, the open space corridor would extend to Diamond. The reduced lanes and diagonal parking could have a traffic-calming effect on this artery.

PD-5

■
AESTHETICS

The previous version of the Community Plan included Design Guidelines for in-fill development. These guidelines have been excluded from the current draft of the Plan. We recommend that design guidelines be incorporated in the current Plan.

Smaller-scale development is more consistent with the existing community feel of the Glen Park village. Any design restrictions that will help preserve or enhance the existing small-scale aesthetic are supported.

PD-6

■
UTILITY UNDERGROUNDING

The Community Plan should identify a goal for the entire area in the plan to have any remaining overhead utilities undergrounded, particularly as the major in-fill sites are developed.

■
Conclusion

We appreciate the opportunity to provide these comments on the DEIR, and the Plan.



Nicholas Dewar
Chairman
Zoning and Planning Committee, Glen Park Association

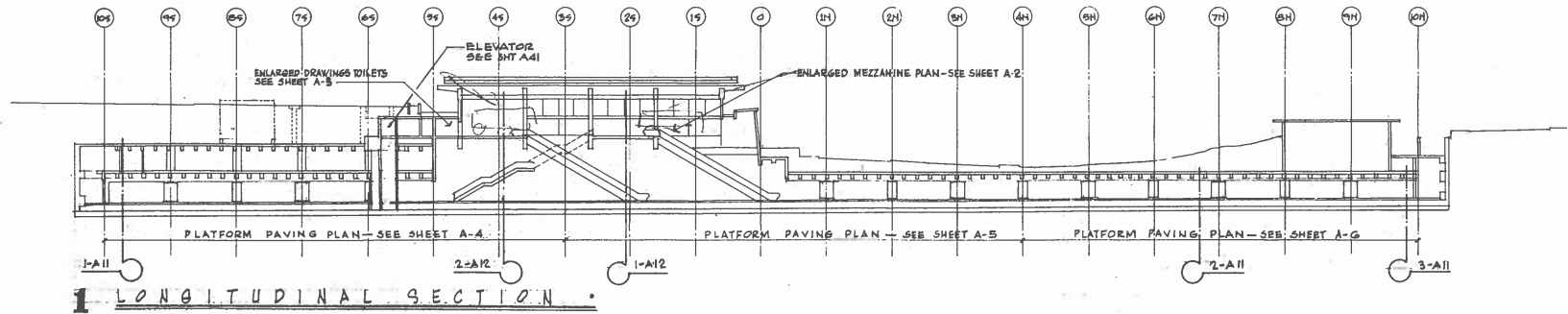
Encl: Documentation regarding BART Station circular plaza

C: John Swae, Planning
Kim Walton, SFMTA

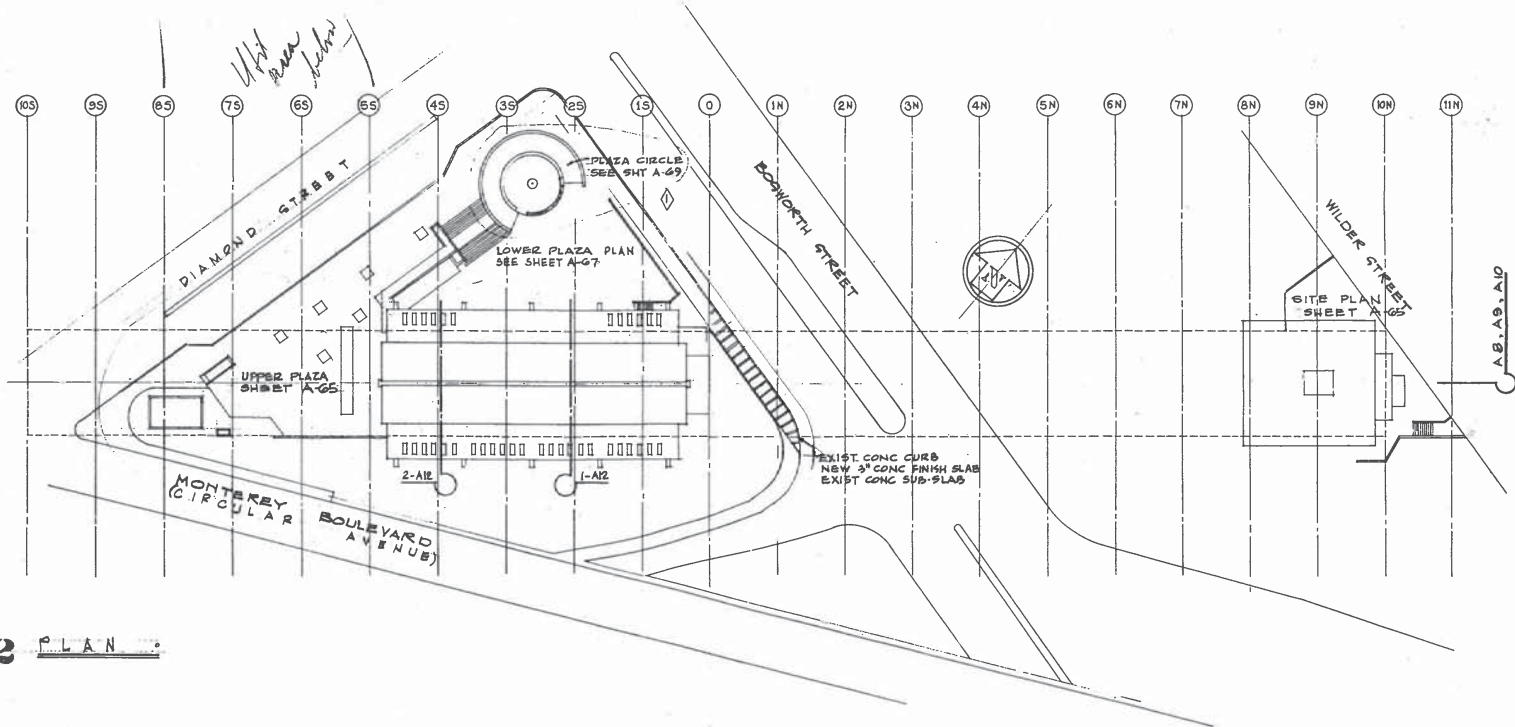


Station shell structure for Glen Park Station. Contract 1M0043 - Glen Park Station Shell.

July 1970

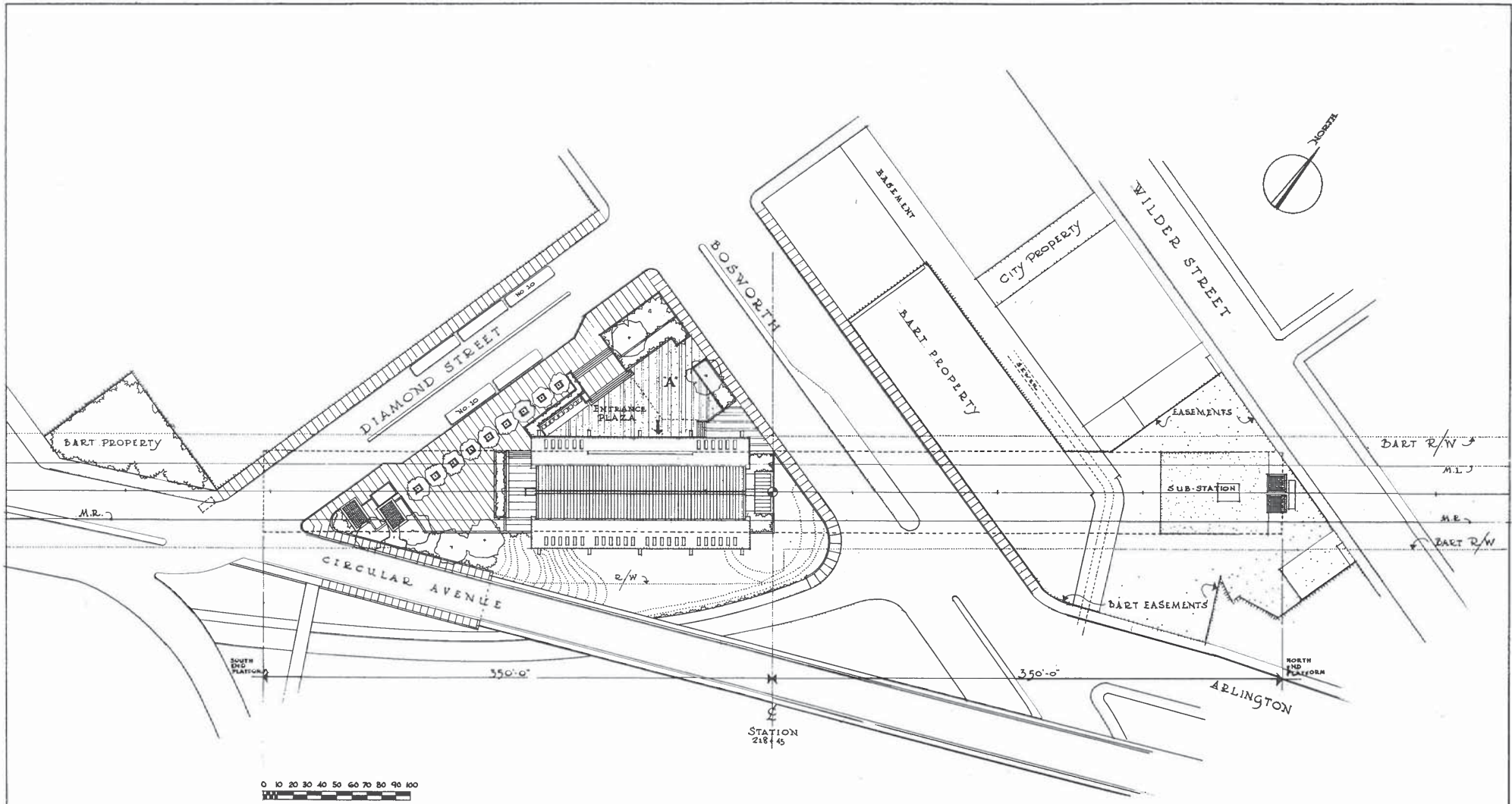


1 LONGITUDINAL SECTION



2 PLAN

15-JUN-70 DRAWN BY: WSP/WHM PLAZA CIRCLE ADDED ADON: H		DESIGNED BY: E. BORN DRAWN BY: D. YEE CHECKED BY: W. SPACKMAN IN CHARGE: W. SPACKMAN DATE: MAY 19, 70		SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT CORLETT & SPACKMAN AND ERNEST BORN ARCHITECTS IN JOINT VENTURE SUBMITTED: <i>W. Spackman</i>		PARSONS BRINCKERHOFF-TUDOR-BECHTEL GENERAL ENGINEERING CONSULTANTS APPROVED: <i>John S. Mank</i>		MISSION LINE GLEN PARK STATION ORIENTATION PLAN AND SECTION		SCALE: 1/8" = 1'-0" CONTRACT: 71-CEASE IM 3041-M004 SHEET NO.-REV: A1-1 PAGE NO: 4	
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• A NOTE:
 PLAN TREATMENT SHOWN AT CORNER IS NOT ADOPTED (AT THIS DATE)
 TREATMENT AS ADOPTED FOR DEFINITIVE DRAWINGS IS SHOWN ON SHEET 2



GRAPHIC SUBWAY REPORT

				DESIGNED BY	SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT				GLEN PARK STATION		SCALE 1/32" = 1'-0"
				DRAWN BY	CORLETT & SPACKMAN AND ERNEST BORN				PARSONS BRINCKERHOFF-TUDOR-BECHTEL		CONTRACT-PACKAGE
				CHECKED BY	ARCHITECTS IN JOINT VENTURE				GENERAL ENGINEERING CONSULTANTS		M004
				IN CHARGE	SAN FRANCISCO - CALIFORNIA						SHEET NO.-REV. PAGE NO.
				DATE	DEC. 1966						1 OF 3 6A
REV.	DATE	BY	APP	DESCRIPTION	REV.	DATE	BY	APP	DESCRIPTION		

RECEIVED

MAY 23 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M F A

Bill Wycko
enviromental review officer
san francisco planning dept.
1650 Mission Street
Suite 400
San Francisco, Ca. 94103

Dear Sir:

The Idea of "daylighting" Islais creek is a really really BAD IDEA!!!

If the creek is daylighted along Kern Street:

1. Who pays for the Flood insurance for the residents and home owners!
You will be creating a flood plane.
2. Who will keep the grates where the creek goes underground CLEAN AND FREE OF DEBRIS!
Every time it rains, we need to clean the grates at the low point on Chilton Ave.
3. Who controls the mosquitoes when the creek forms standing water and wetlands.
4. When the city has financial problems creating more expense in the form of a worker to maintain the creek seems not so bright an idea.

As a homeowner I am very much against the creating of water problems in my neighborhood.

Thankyou,

Lesley Kinnear
5 Chilton Ave.
San Francisco, Ca. 94131

GC-8

**Maria Louisa Hekker
88 Chilton Avenue
San Francisco, CA 94131**

RECEIVED

25 May 2011

MAY 31 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E 3

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

**Re: Draft Environmental Impact Report for Glen Park Community Plan
Planning Department Case No. 2005.1004
State Clearinghouse No. 2009072013 ("Draft EIR")**

Dear Mr. Wycko –

I live in Glen Park. For the most part, I love the ideas in the Glen Park Plan and applaud the hard work of many in the City government and the neighborhood. But I do have some very serious concerns about the proposal in the Glen Park Plan for the daylighting of Islais Creek and further greenbelt development. My house abuts the land in question. I have been in continuous correspondence with Jon Swae regarding my concerns. Several of my neighbors have also expressed serious concerns about these proposals. So I am writing to ask that the Draft EIR referenced above require that any "further studies" of daylighting Islais Creek address these concerns. They include:

Problems Related to Failure by the City of San Francisco to Maintain this Land – We have lived in this house for almost 13 years. During that time, the undeveloped city land and the land owned by St. John's School that surrounds our house have been very poorly maintained. Despite many repeated requests neither the City nor St. John's School has ever taken responsibility for maintaining it. (Instead, the neighbors have had to organize neighborhood cleanups.) Here are some examples:

- **Hazardous Trees** - The greenbelt that runs between my house and Bosworth Street is filled with dead and dying trees (which all seem to be riddled with the same fungus). I reported them to the City on September 9, 2011. About a month after that call, the Department of Public Works posted a tree removal sign outside my house. I found the name of Robert Stafford on that posting and called him. He informed me that the DPW would only remove the one tree that was closest to my house. (That operation occurred on October 21, 2010.) In our phone call, Mr. Stafford told me that since the other dead trees did not threaten houses they would be addressed later. He also told me that my request to trim tree limbs that extend over my house would be put off until a later time. On March 20, 2011, one of the trees that the DPW declined to cut down in September fell across a footpath frequently used by residents of Glen Park (and prominently featured in the Draft EIR) and landed dangerously close to both my back yard and the St. John's School play yard (each places where many children play daily). The tree fell into the standing water on the footpath (caused by the rains that came with the storm that felled the tree). I immediately called 311 and sent emails to the DPW and Mr. Swae requesting that the City promptly remove **ALL** of the dead trees in that area and trim back the heavy limbs reaching over my house (and the house of my neighbors at 45 Chilton Avenue). To date none of these actions have taken place.

GC-8

- **Trash Dumping** - Homeless live out in the high bushes of the greenbelt during most of the year. They leave lots of trash and start fires. In addition, many folks dump their trash down off Bosworth Street. Finally, all of the trash from St. John's schoolyard blows down into that area. Despite my many, many requests that the City and St. John's clean up this land, it remains riddled with trash.
- **Fire Hazard** - The 8 to 10 foot high weeds that grow annually in this area create an enormous fire hazard. I have contacted the City many, many times about this problem. They have sent crews to clear the land only twice in the last 13 years.
- **Flooding** - As noted in the first bullet above, this land FLOODS every time it rains. St. John's School has covered its entire yard with tarmac but has not provided any drainage for it. The yard slopes downhill and water runs off the tarmac to the natural streambed below. We have repeatedly asked St. John's to comply with the law and provide adequate drainage for their property but those requests have been ignored. We have also asked the City to force St. John's to comply with the law. Those requests have also been ignored. After years of having half a foot to a foot of water sitting next to our foundation, we finally worked with our neighbors to lease the land north of our house from the San Francisco Public Utilities Commission. We then landscaped, graded and added drainage to the land all at our own (and not insignificant cost) – merely to protect our foundations. The land behind and to the west of our house still floods and remains flooded for several months each year – even after years of drought. Given that the City does not clean up fallen trees or dumped garbage or require St. John's to properly drain its land, you can only imagine what a mess it becomes.
- **Mosquitoes** - In addition to the property damage, the standing water also results in horrible mosquito problems in warm weather.

Given this track record, I have very little faith that the city can maintain Islais Creek if it ever brings its water above ground. I am concerned that the flooding will get worse and that the trash, weeds and homeless will only increase. On top of all of that, the trash and weeds would then exist in a wet marshy area - making an even larger mess and attracting even more mosquitoes. Therefore, I request that the EIR require the City to fully address all of these problems and concerns.

Public Safety Concerns – The Draft EIR cites creek bed and bank erosion as the chief concerns related to daylighting Islais Creek. This is a very real concern that I expect you will address. I was surprised, however, to find that the Draft EIR does not seem to cite any other concerns. In addition to the very real risk of erosion and the flooding, trash, falling trees and fire hazards cited above, I would like for the City to also consider:

- **Hazardous Waste** – As described above, chemical, biological and other waste gets dumped into the greenbelt and former streambed on a regular basis. I am surprised that the that the Draft EIR did not require testing of the greenbelt and former streambed for toxic chemicals and other waste (from the animals that are walked in the area, the cars that use the St. John's lot and the trash and other waste dumped in the area). Please include this sort of testing in your study.

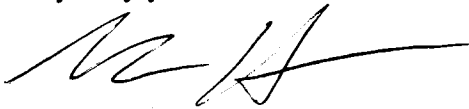
Bill Wycko
Environmental Review Officer
San Francisco Planning Department
25 May 2011
Page 3

GC-8
Con't

- **Sewage Back Up** - On several occasions during large storms, sewage has backed up and out of sewers and toilets in the neighborhood. This has mostly occurred further east of our block but it has also occurred on our block. Since it has happened more than once in my almost 13 years here, these are not the 200 year storms referenced in the Draft EIR. Rather, it seems to be a due to inadequate sewage and storm water drainage. I fear that these inadequate systems would cause a daylighted Islais Creek and the greenbelt around it to become a swampy sewer. I would like for the Draft EIR to require testing on the adequacy of these infrastructural systems to see if they can support the proposed daylighting project.
- **Children and Pets** - Several small children live, play and go to school in this area. Many folks also use it to walk their dogs. I have many concerns about the daylighted creek – especially where it would come above and go back under the ground and the safety of the areas children and pets. I would like for the City to fully account for these concerns in any future proposals.

Thank you for your time and attention.

Very truly yours,



Maria Hekker

> t
>
> 06/02/2011 09:26 "linda.avery@sfgov.org" To
> AM <linda.avery@sfgov.org>
> cc
>
> Subject
> 6/2/11 Meeting Item 13 Request for
> Continuence and for Reasonablle
> Accomodatio

> To the Planning Commission:

> I am vision impaired. I tried to review the draft EIR at the Glen Park
> Library but it is so massive and the printing so small, it is very
> laborious and causes medical symptoms trying to read it with a hand
> magnigifier.

IS-1

> Nontheless, I believe there are defociencies in the report, for instance,
> in the summary, section II, I saw no mention of urban wildlife study or
> impacts.

PD-1

> Also the map of the boundaries proposed for the affected area seemed to
> extend beyond the area as described in narrative.

GC-2

> I need to study the draft EIR further at the Main Branch of the SF Public
> Library using their digital magnification equipment.

> However, the Main Branch was not listed as a place where a copy can be
> found.

> And the Glen Park Branch doesn't have that equipment. Only the Main
> Branch does.

> So please continue this matter until a month after copy has been
> deliveered to the Main Branch and you have notified me by e-mail.

> Sincerely,

> Philip Siefert

From: psiepert@sonic.net
To: Lisa.Gibson@sfgov.org
Subject: Re: Fw: 6/2/11 Meeting Item 13 Request for Continuence and for Reasonable Accomodatio
Date: 06/03/2011 04:29 PM

Hello Ms. Gibson,

I phoned and confirmed the copy you mentioned is at the Gov't sesctuib at the main branch -- that wasn't mentioned on the Planning Dept site, aND they have a magnifying machine there as well as at the Library for the Blinf,

I am hard to reach by phobe as my message machine is not functtioning and to be connected to the internet I have to tie up my phone line.

Maybe next week we can trade e-nails and possibly set a time for a phone call.

Meanshile, I have already identified some problem wlrth both the plan and the drat EIR it sposedly studies.

■ For instance, where is the biological component?

IS-1

■ There is significant public space with flora and fauna that would have signigicant irreversible impacts, yet as far as I can see, the EIR dismisses this in a summary fashion.

I have to go -- sorry I don't have time to truple check for the typos I didn't catch yet.

Thanks,

Philip Siepert

Daniel O'Keefe
56 Chilton Avenue
San Francisco, CA 94131

June 5, 2011

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street Suite 400
San Francisco, CA 94103

RE: Draft Environmental Impact Report for Glen Park Community Plan

Dear Mr. Wycko:

I am submitting these comments for inclusion in the DEIR proposal to the Planning Commission. It outlines my very serious concerns regarding the day lighting of Islais Creek.

I live at 56 Chilton Avenue, which abuts the easement through which the creek could theoretical flow. Maria Hekker and Jeff Tyce own the house at 88 Chilton Avenue, which is on the other side of the easement.

I must point out that the concerns I am raising in this letter are concerns that the neighbors of Chilton Avenue have raised repeatedly in the past. It is with consternation and a great sense of confusion that I raise the question of why these issues continue to go unaddressed. They certainly are relevant to the Draft Environmental Impact Report. Many of the residents of Chilton Avenue have sent written comments to both you and John Swae regarding this creek issue. The neighbors on Chilton Avenue (i.e the people who would be directly impacted by this proposal) have had a meeting with John at my house to discuss this issue. There is not a single person on this block who is not adamantly opposed to this idea for a number of reasons. We have voiced our concerns over and over again, but they go unaddressed as this plan continues to evolve. I am copying our District Supervisor Scott Weiner on this letter in the hope that his involvement might help bring some focus to our concerns.

From the highest level, let me just comment on what is being proposed here. We are talking about voluntarily introducing a body of moving water between two houses that sit less than twenty-five feet apart. Water damages foundations. Water erodes soil. Moreover, we are talking about houses that sit in an earthquake zone where liquefaction is already an issue. We are in effect talking about voluntarily introducing unnecessary structural risks to people's houses. I notice that the Draft EIR does cite creek bank erosion as an area of study, but does not mention the risks

GC-8

GC-8
Con't

posed to our houses. Should there not be a full seismic review performed to assess the increased seismic risks to our houses?

I was surprised to read that none of the other concerns that my neighbors and I have repeatedly raised have been addressed. They are:

- **Garbage:** The creek would flow through a valley situated between St. John's School and Bosworth Avenue. There is a tremendous amount of trash that blows down from both areas, trash that does not ever get cleaned up unless the neighbors take the initiative to do so. If we put a creek through that location, it will be constantly filled with litter and trash.
- **Hazardous Waste:** Why is there nothing in the draft EIR to study the soil quality and the water quality in the easement. Not only do people dump all kinds of waste back in that area, but also there is a tremendous amount of run-off from St. John's School. St. Johns has almost a whole city block of asphalt with absolutely no drainage provisions. The tarmac simply runs off into that land and has likely accumulated all kinds of toxic chemicals. Moreover, what is the water quality that already runs through Islais Creek? Does it already have chemicals in it?
- **Flooding:** Because of the run-off from St. Johns and the lack of drainage, the easement behind our houses is flooded during rainy season. This would be exacerbated with a creek running through it.
- **Maintenance:** The City does not maintain the land as it is. It is currently overgrown with weeds. Moreover, the city easement runs between land that is owned by St. John's School on both sides. How feasible is it to deal with issues of upkeep and safety when the area in question is owned by two separate parties, neither of whom takes any responsibility for its maintenance.
- **Insects:** Insects are already a problem when the weather is warm. This would only be worse if we introduce more water. This increases the risk to my family and the families in the area of insect born diseases.

I urge the Planning Commission to consider all of these issues as it refines the Glen Park Plan.

Thank you for your time.

Sincerely,

Daniel O'Keefe

Diane Grant
616 Arlington St.
San Francisco, CA 94131
415-333-2920

RECEIVED

JUN 13 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Bill Wycko,
Environmental Review Officer
San Francisco Planning Dept.
1650 Mission St. Suite 400
San Francisco, CA 94103

June 7, 2010

RE: Glen Park Community Plan Case No 2005.1004
State Clearinghuse No 2009072013 -- HEIGHT LIMIT

Dear Mr. Wycko:

I have attended several meetings of the Glen Park Association and other related groups discussing the Community Plan but was unable to attend the June 2 meeting.


AE-1 ■ Increasing the height limit has not received support and has generated some very angry discussions during those meetings. But it sounds from your Public Notice letter that it is still being considered.

■ Increasing the height limit to 45 feet would create an undesirable atmosphere in our neighborhood. And the phrase "set-back" is a feeble attempt to spin the effort.

IS-2 ■ I have emailed pictures to representatives in the planning department to demonstrate how much shadow such buildings create, suggested that higher wind speeds would result (based on experience from other areas in SF) and mentioned that the increased density changes the unique character of our "village". The hills surrounding this neighborhood give it the valley feel and the views of those hills minimize the feeling of cramped city living.

PD-2 ■ I don't have to explain to you how unique Glen Park is. And I can't fathom the logic behind some of your bicycle lane designs, so I won't even try to discuss that. But please don't surround us with sky-blocking vertical structures!

IS-2 ■ As you can see from the attached photos, even a 40-foot building blocks the sun beginning in the early afternoon. I trust you will make every effort to preserve our neighborhood character by keeping the height limit to 40 feet or less.

AE-1 ■
Sincerely,


Diane Grant

also supporting this objection:
Barry Krasner 616 Arlington
Mary Delozlovici 612 Arlington

Glen Park

Height Limit objection

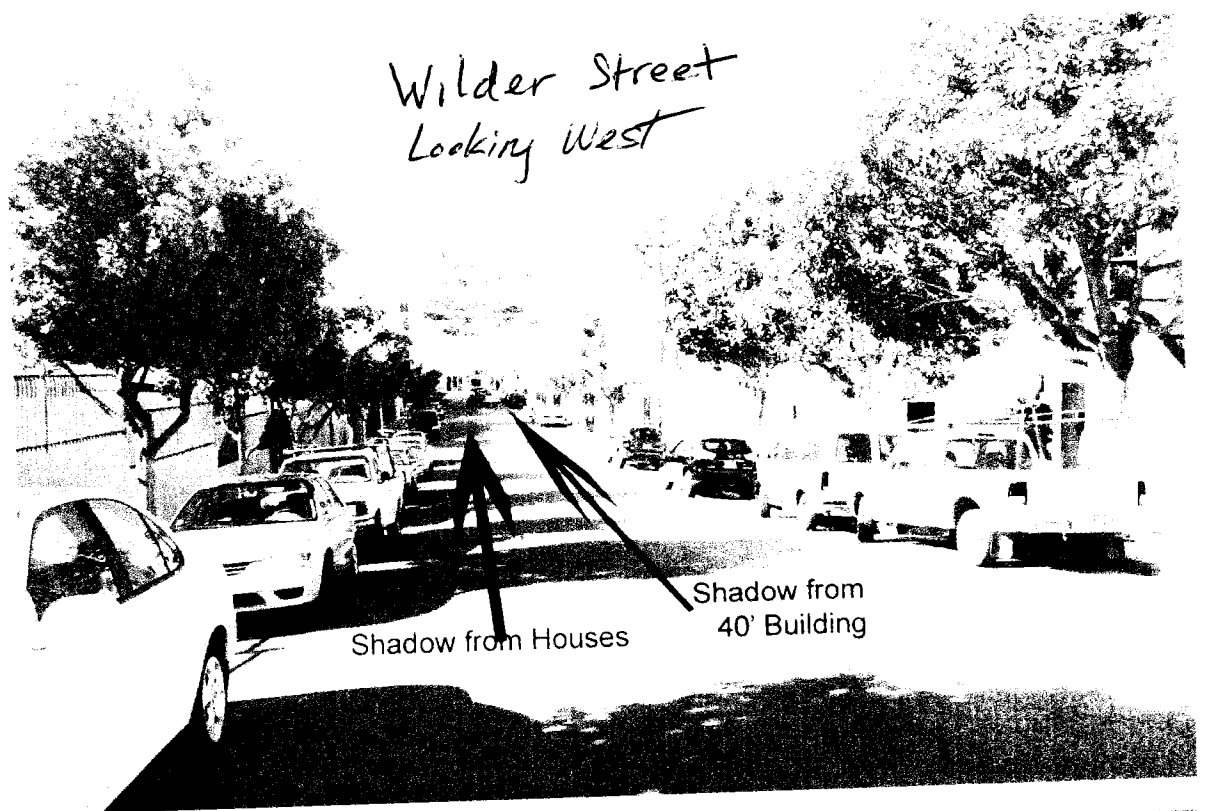
November 15, 2010 12:20pm

Example of the effect
of taller buildings

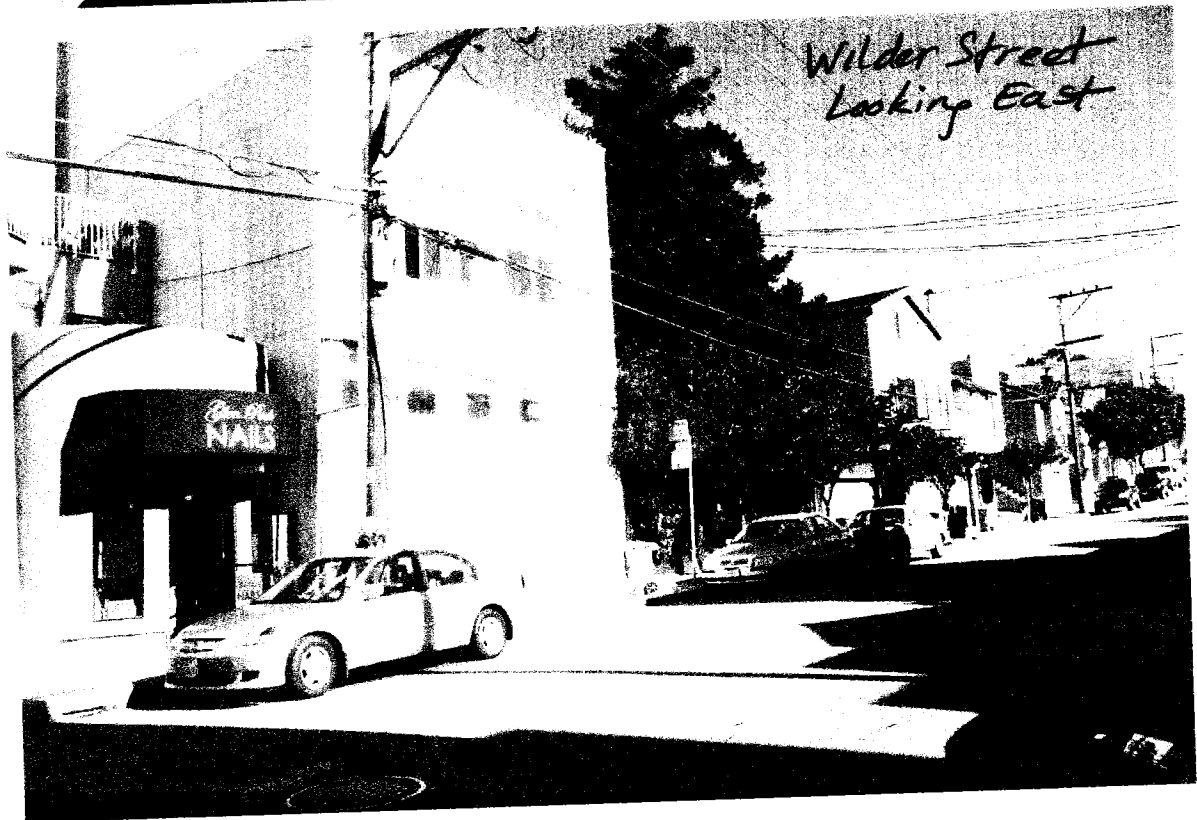
e.g. the condos
next to the Glen Canyon
Market... and I
believe the increased
height was deemed
inconsequential
because of the "set-back".

Diane Grant
616 Arlington St
94131
(415) 333-2920

Wilder Street
Looking West



Wilder Street
Looking East



June 13, 2011

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Via e-mail only to: bill.wycko@sfgov.org
lisa.gibson@sfgov.org

RE: Glen Park Community Plan Draft Environmental Impact Report – Public Comment

Dear Mr. Wycko,

I would like to submit the following comments on the Glen Park Community Plan Draft EIR as member of the community residing on Joost Avenue.

My comment is a general comment regarding commercial development on Joost Avenue under the new neighborhood commercial transit (NCT) zoning. While the southern side of the first block of Joost Avenue up to the intersection with Lippard Street is currently zoned commercial, the actual usage is predominantly residential. The southern side of the street is zoned commercial where lots front both Joost Avenue and Monterrey Blvd; however, existing commercial frontage is on Monterrey Blvd. The Community Plan rezoning may promote in-fill development and the replacement of the current residential units on Joost Ave with commercial developments and storefronts. The expansion of commercial development on this residential street could have significant impacts on the aesthetic character of Joost Avenue.

LU-1

Spreading commercial development onto previously residential streets also has a potential to dissipate the positive effect of a concentrated commercial village. Joost Avenue should not be transformed from a quiet residential street into a mixed-use block with minimal controls on the types of commercial uses present. The fragile residential quality of this block of Joost Avenue has recently been reinforced by the structural and aesthetic improvements of some of the housing stock. The introduction of commercial storefronts could have negative impacts on the aesthetic and residential character of the street. The EIR should include design guidelines in the form of mitigation on the proposed rezoning of existing commercial lots facing Joost to either prevent them from fronting onto Joost or limiting their uses and storefronts to fit with the residential character of the street (i.e., low traffic professional businesses such as real estate or architectural design offices).

Thank you for consideration of this comment.

Sincerely,



Tania Treis

modernpast@aol.com

06/13/2011 04:25 PM

To

Bill.Wycko@sfgov.org

cc

Subject

Glen Park Draft EIR Public Comment

Dear Mr. Wycko,

I hope you will accept this public comment for Glen Park Draft EIR. Any new zoning in Glen Park, a special commercial/residential transit area, should have

a new ZONE description to signify an area close to Freeway access.

This will allow future building to continue a 1 car parking space per unit built.

It is imperative to keep this as a minimum so the business district can survive and

continue to be an asset to the community at large.

One more thing, can we please have some family housing. (3 bds or more)

Thank you,

Ric Lopez

PD-7

APPENDIX 2
TRANSCRIPT OF DRAFT EIR PUBLIC HEARING

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1 BEFORE THE SAN FRANCISCO PLANNING COMMISSION

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REGULAR MEETING

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ITEM F.13

6

2005.1004E GLEN PARK COMMUNITY PLAN

7

PUBLIC HEARING ON THE

8

DRAFT ENVIRONMENTAL IMPACT REPORT

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12:00 P.M.

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June 2, 2011

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Commission Chambers - Room 400

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City Hall, 1 Dr. Carlton B. Goodlett Place

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San Francisco, California

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REPORTED BY: FREDDIE REPPOND, STENOGRAPHIC REPORTER

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A P P E A R A N C E S

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SAN FRANCISCO PLANNING COMMISSION:

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President Christina R. Olague

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Vice President Ron Miguel

5

Linda Avery, Commission Secretary

6

COMMISSIONERS:

7

Michael Antonini

8

Gwyneth Borden

9

Rodney Fong

10

Kathrin Moore

11

Hisashi Sugaya

12

PRESENTATION:

13

Lisa Gibson, Senior Planner,

San Francisco Planning Department

14

FROM THE PUBLIC:

15

Sally Ross

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Nicholas Dewar

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[The item was called at 1:10 p.m.]

2

SECRETARY AVERY: You are now on Item No. 13,

3

Case No. 2005.1004-E, Glen Park Community Plan. This is

4

a public hearing on the draft environmental impact

5

report.

6

COMMISSIONER SUGAYA: Before you start, I have

Page 1

7 to ask for recusal. The company that I work for
8 prepared the historic resource evaluation for the Glen
9 Park Community Plan; and, therefore, I ask for recusal.

10 PRESIDENT OLAGUE: So moved.

11 COMMISSIONER BORDEN: Second.

12 SECRETARY AVERY: On the motion to recuse
13 Commissioner Sugaya, Commissioner Moore.

14 COMMISSIONER MOORE: Aye.

15 SECRETARY AVERY: Commissioner Sugaya.

16 COMMISSIONER SUGAYA: Aye.

17 SECRETARY AVERY: Commissioner Fong.

18 COMMISSIONER FONG: Aye.

19 SECRETARY AVERY: Commissioner Olague.

20 PRESIDENT OLAGUE: Aye.

21 SECRETARY AVERY: Commissioner Miguel.

22 VICE-PRESIDENT MIGUEL: Aye.

23 SECRETARY AVERY: Commissioner Borden.

24 COMMISSIONER BORDEN: Aye.

25 SECRETARY AVERY: Commissioner Sugaya is

0004

1 recused.

2 MS. GIBSON: Good afternoon, President

3 Olague --

4 PRESIDENT OLAGUE: Oh, Commissioner Moore.

5 Okay.

6 COMMISSIONER MOORE: We received a letter from
7 the public. And it probably can be clarified for us in
8 a moment. A resident by the name of Mr. Philip Siebert
9 sent an email late this morning. He is a
10 vision-impaired individual living in the Glen Park
11 neighborhood and had encountered difficulties in that
12 library to fully access the EIR based on that particular
13 library not having the right equipment for him to
14 comfortably read the thing. He asked for a continuance.
15 However, we would like to ask staff to offer the type of
16 typical options that exist, particularly when people
17 have the time to read the thing in the main library, and
18 then can come and respond in writing.

19 Could you please, for the record, clarify
20 that for Mr. Siebert.

21 MS. GIBSON: Thank you for that question. I'm
22 Lisa Gibson with the Planning Department.

23 And I'm aware of the communication from Mr.
24 Siebert. And I did reply to him this morning to inform
25 him that the draft EIR is available for public review

0005

1 at the main library. And the main library has a device
2 called the Very Easy Reading Appliance that enables
3 patrons to have English-language materials read out
4 loud.

5 Also, we want to insure that we will provide
6 members of the public who are visually impaired with
7 ample opportunity to review the document, the time that
8 they need to do that. The public review period does
9 extend to June 13th. So we hope that that will
10 facilitate Mr. Siebert's needs.

11 COMMISSIONER MOORE: And then he will be able
12 to respond to you in writing; and he is clear about
13 that?

14 MS. GIBSON: Yes. We did inform him that the
15 hearing today is just one opportunity to provide
16 comment, but that the hearing -- the review period
17 extends to the 13th of June.

18 PRESIDENT OLAGUE: Thanks for raising that.
19 Maybe at some point -- this isn't on the
20 calendar, I'm not going to discuss it -- but maybe the
21 staff should check in with the Mayor's Office on
22 Disability to ensure that the website is, you know,
23 accessible and user-friendly for folks with visual and
24 hearing challenges.

25 MS. GIBSON: Thank you. With that, I will
0006 begin my presentation?

1 PRESIDENT OLAGUE: Great.

2 MS. GIBSON: Good afternoon, President Olague,
3 members of the Commission. I'm Lisa Gibson with the
4 Planning Department.

5 This is a hearing to receive comments on the
6 draft EIR for the Glen Park Community Plan Draft EIR,
7 Case No. 2005-1004E.

8 Staff is not here to answer questions today.
9 Comments will be transcribed and responded to in
10 writing in a comments-and-responses document which will
11 respond to all verbal and written comments and make
12 revisions to the draft EIR as appropriate.

13 This is not a hearing to consider approval or
14 disapproval of the project. That hearing will follow
15 final EIR certification. Comments today should be
16 directed to the adequacy and accuracy of information
17 contained in the draft EIR; that is whether the draft
18 EIR identifies and analyzes the possible significant
19 environmental effects of the project and identifies
20 appropriate mitigation measures.

21 Commenters should speak slowly and clearly so
22 that the court reporter can produce an accurate
23 transcript. Also, commenters should state their name
24 and address so that they can be properly identified and
25

0007 so that they can be sent a copy of the
1 comments-and-responses document when prepared. After
2 hearing comments from the general public, we will also
3 take any comments on the draft EIR by the Planning
4 Commission.
5

6 The public comment period for this project
7 began on April 27th, 2011, and extends until 5:00 p.m.
8 on June 13th, 2011.

9 And for your information, Commissioners, the
10 Historic Preservation Commission held a hearing on the
11 draft EIR on May 18th, 2011. I have copies of the
12 HPC's comment letter for Planning Commissioners and for
13 members of the public. The copies for the public are
14 over there and the Commission secretary. Thank you.

15 This concludes my presentation on this
16 matter. And unless members of the Commission have
17 questions for me, I respectfully suggest that the
18 public hearing be opened.

19 PRESIDENT OLAGUE: Thank you.

20 Sally Ross.

21 SALLY ROSS: Good afternoon. My name's Sally
22 Ross. I live at 201 Joost Avenue. Thank you for the
23 opportunity to address you.

24 I was impressed with the draft EIR when it
25 stated that the new development would be appropriately

0008 scaled and designed to consider the established
1 patterns of the community. And it went on to establish
2

AE-1



AE-1
Con't

3 patterns within the historic survey and so forth, very
4 nicely presented.

AE-1

5 I am a little taken aback by their then
6 offered proxy of the sort of buildings that might take
7 -- might be placed on the infill development, both on
8 the BART parking lot and on the Bosworth and Diamond
9 Street area. Both of these are looking pretty large.
10 And, obviously, they just drew blocks in; they're not
11 building plans. But they do seem rather intimidating,
12 especially the NCT transit rezoned areas of the BART
13 parking lot, which is not really part of this but it's
14 considered throughout, is the -- would allow any
15 building to be some 25 feet taller than its neighbors.
16 Most of the existing Glen Park village is only built to
17 a standard -- well, it's built to a standard height
18 limit of 40 feet; and the buildings there are less than
19 45 feet.

TR-6

20 Another item I would like to address is the
21 possible bus loop that was suggested for moving around
22 behind the BART station itself. I think it's a really
23 good idea. Also, close by that area would be an
24 integration or a better integration and improved access
25 to the J-Church line. And I would like it if the -- if
0009
1 the proposal or the demonstrations more clearly address
2 the interaction of these two items. It seems to me
3 that the diagrams that were given show the progress
4 walking across the area where the bus driveway would
5 go. I'm not sure if that's desirable or not. The way
6 to avoid the bus line seems to be either go over it or
7 go under it. Either way is kind of expensive.

GC-5

8 Finally, there are three development options.
9 And I support Plan B with the little denser housing and
10 less impact from traffic and so forth. That's my
11 suggestion for the Commission, yes.

GC-4

12 PRESIDENT OLAGUE: Thank you. Thank you. If
13 there is any additional comments, you can always submit
14 them in writing -- you're probably aware of that too --
15 until the 13th.

16 Nicholas Dewar. Dewar. Okay. Sorry about
17 that.

GC-3

18 NICHOLAS DEWAR: That's fine.
19 Good afternoon, Commissioners. My name's
20 Nicholas Dewar. I'm a resident of Glen Park; and I am
21 on the Glen Park Association. I chair the
22 association's zoning and planning committee.

23 The association is going to submit comments
24 in writing before the 13th of June, so I won't go into
25 that right now. But I do want to tell you that they

0010
1 are coming and we are working hard on them already.

2 I wanted to thank the Planning Department,
3 especially John Swae and John Billovits, for the
4 attention that they've been paying to input from the
5 community. And we've noticed, as this plan has been
6 rolling forward, that it's changing to reflect the
7 community's concerns; and we appreciate that very much.
8 I think there's further to go on that, obviously, as it
9 gets closer to your attention; and there will be plenty
10 for you to decide on when it gets in front of you.

11 So thank you very much for this opportunity
12 to address you; and I look forward to sending in the
13 written comments in a couple of weeks.

14 PRESIDENT OLAGUE: Thank you.
15 Is there additional comment? Seeing none,
16 public comment is closed.

17 Commissioner Miguel.

18 VICE-PRESIDENT MIGUEL: Yes. I had the
19 pleasure of attending either two or three -- I think
20 possibly three -- of the community meetings in this area
21 prior to the development of the EIR. I found them very
22 well attended, as I believe I mentioned before, and very
23 interactive in the Q-and-A sessions with the
24 participation of the community there. And then I think
25 that's the way these types of area developments should

0011
1 go forward.

2 Just so the public understands, what an EIR
3 considers are the maximums. It doesn't mean that
4 everything is going to go to that maximum. But the EIR
5 has to consider it so that anything up to that, but
6 less is still okay when it's considered; and any
7 developments or anything will have to come before the
8 department and Commission in the future.

9 In particular, in the summary section,
10 although previous testimony regarding this program when
11 it came before the Commission concentrated a bit on the
12 absence of exact plans from BART for their property, if
13 you will note, particularly as I say, in the summary
14 section on S-4 and S-5 the possible maximum
15 developments on the BART site are fully covered; and so
16 whatever happens there is already considered within
17 this EIR and properly so.

18 As to the comments that just came before from
19 the public, what is contained here are possibilities
20 and suggestions. It doesn't, obviously, mean any of it
21 is going to happen in that exact manner; and there can
22 be a little bit of pick-and-choose by the time you get
23 to the final.

24 I find it interesting that, basically of
25 in-fill development, we are talking of an absolute

0012
1 maximum of 150, which is not massive. But this is a
2 very, very tight community and a very tight area, if
3 anyone is familiar with it. And 90 of those are the
4 possibility for the BART parking lot itself. So when
5 you take that away, we're not talking of a lot of
6 development.

7 The transportation and movement section is
8 probably the most important. That is the biggest
9 consternation in that area of how anyone gets around,
10 whether it be pedestrian, bicycle, motor vehicle, or
11 BART, for that matter. And I think they are very, very
12 well considered.

13 I find this EIR a little different than some
14 I've criticized before. It does not sound like a PR
15 project and written by a developer; and I am very glad
16 to see that.

17 SECRETARY AVERY: Thank you.

18 I believe that that will close the public
19 hearing on the draft environmental impact report.

20 Just keep in mind that written comments will
21 be accepted at the Planning Department until 5:00 p.m.
22 on June 13th, 2011. Thank you.

[The item concluded at 1:25 p.m.]

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STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

CERTIFICATE OF REPORTER

I, FREDDIE REPPOND, a duly authorized
Shorthand Reporter and licensed Notary Public, do hereby
certify that on the date indicated herein that the above
proceedings were taken down by me in stenotype and
thereafter transcribed into typewriting and that this
transcript is a true record of the said proceedings.

IN WITNESS WHEREOF I have hereunto set my hand
on this 6th day of June, 2011.

FREDDIE REPPOND

APPENDIX 3
GLEN PARK COMMUNITY PLAN REFINEMENTS
SUBSEQUENT TO DEIR PUBLICATION



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: September 23, 2011
TO: Lisa Gibson, Environmental Planning
FROM: Jon Swae, John Billovits, Citywide
RE: Glen Park Community Plan Refinements Subsequent to Draft EIR Publication

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Since publication of the *Glen Park Community Plan Draft Environmental Impact Report* on April 27, 2011, the Planning Department has continued to refine the Community Plan in response to community comments and concerns. At this point in time, the recommended modifications to the draft Plan, zoning and heights proposals analyzed in the DEIR are outline below. Please also see attached handout.

Zoning Modifications:

Diamond Street Rezoning (see Map)

The row of six residentially zoned apartment buildings on Diamond Street across from BART Station between Bosworth and Joost has been reclassified from RH-3 (Residential 3 units) to Glen Park Neighborhood Commercial Transit (Glen Park NCT) District. These properties form a gap in the commercial district. A zoning change could allow conversion of ground floor garages into commercial spaces at some future time while allowing existing residential units to remain.

Chenery/Castro Streets (see Map)

The Department has added the following two residentially zoned properties to the Glen Park NCT district: 605 Chenery Street & 3121-25 Castro Street. Given their historic commercial use and character, they are appropriately represented by a change to neighborhood commercial zoning. This zoning change would formally recognize these properties as part of Glen Park's commercial district. These properties contain legal operating commercial uses. One of the properties (3121-25 Castro Street) is located outside the Plan boundary. The Plan boundary has been modified to include this property and the fronting street and intersection.

Plan Boundary:

The Plan boundary has been modified to include the property referenced above (3121-25 Castro Street) and the fronting street and intersection (GIS shapefile available).

Height District Modifications:

Height Reduction (see Map)

One of the main goals of the Plan is to strengthen the character of Glen Park's vibrant, walkable neighborhood commercial district. The Planning Department proposes a revision to the height district in

the Draft Plan that more closely reflects the existing building scale. This change would reduce the maximum height of new construction from 40' to 30' within the interior of the "village" on portions of Wilder, Diamond and Chenery Streets (see attached map). Additionally, the following properties have been added to the 30' height district: 605 Chenery Street & 3121-25 Castro Street. Throughout the entire Glen Park Neighborhood Commercial Transit District (Glen Park NCT), a 5' height bonus would be allowed for active ground floor uses permitting buildings up to 35' and 45' depending on their location within the district (see attachment: Heights Proposal).

Policy & Supporting Language Modifications:

Since publication of the working draft Glen Park Community Plan (September 2010), the following revisions to Plan language have been made. Changes include both new policies and supporting text. These are highlighted below in underlined italics. Additional slight changes have been made throughout the document to enhance clarification.

Land Use & Urban Design Chapter

POLICY 1.3

Recognize the historic commercial pattern of the neighborhood by including existing Limited Commercial Uses (LCUs) into the neighborhood commercial district.

A small number of commercial uses exist in Glen Park that are not technically zoned for commercial activity. These popular businesses contribute to the vitality of the commercial district. However, they are currently zoned for residential use and so not formally recognized as part of the district. Incorporating these properties into the neighborhood commercial district will ensure their important contributions to the area are preserved.

POLICY 1.5

In the more sensitive interior of Glen Park village, building heights should be reduced to respond to the prevailing pattern found there.

The interior of Glen Park village is characterized by two and three-story buildings. This fine-grained pattern creates an intimacy and comfortable pedestrian environment. A revision to the area's height district that reduces the maximum height of new construction on certain blocks should be considered to reflect the established pattern.

POLICY 2.4

Design of new buildings should be consistent with the neighborhood's existing pattern.

New buildings or major renovations should reinforce the character of Glen Park by creating attractive, pedestrian-friendly places to live, visit and shop. Infill development should follow existing design guidelines and be consistent with the intent and policies of the Plan particularly in relation to scale, height, bulk, materials and details.

The height of proposed development should relate to neighborhood character. Setbacks of facades may be appropriate to avoid an overwhelming appearance of new structures. Human-scaled buildings should be designed to be built close to the sidewalk, have active ground floors, use high-quality materials, and contain interesting features. Long blank monotonous walls or highly visible parking entrances should be avoided.

Transportation Chapter

POLICY 10.3

Support carsharing in Glen Park as way to reduce private vehicle demand and parking.

Carsharing offers an affordable alternative to car ownership by allowing individuals the use of a car without the cost of ownership (gas, insurance, maintenance). Many drivers use one vehicle for short-term trips. This allows for the efficient use of a single vehicle and can lead to reduction in cars on streets. While carsharing vehicles parking and spaces are arranged by companies and private land holders, the Plan supports their presence in the area.

Open Space Chapter

POLICY 11.4

The San Francisco Public Utilities Commission (SFPUC) and Planning Department should conduct a study to assess the feasibility, benefits and impacts of daylighting a portion of Islais Creek through Glen Park.

Islais Creek once flowed freely from Glen Park to the San Francisco Bay. Today the creek can only be seen for a small stretch in Glen Canyon before it disappears underground into a culvert beneath the recreation center. Creek “daylighting” is the redirection of a stream into above-ground channels. The City should conduct a study to assess the feasibility of such a project and identify potential impacts and benefits. Some residents have expressed concerns related to flooding, maintenance, erosion, pest control, public safety and risks to adjacent property owners. These concerns should be assessed as part of any future study.

Implementation Table

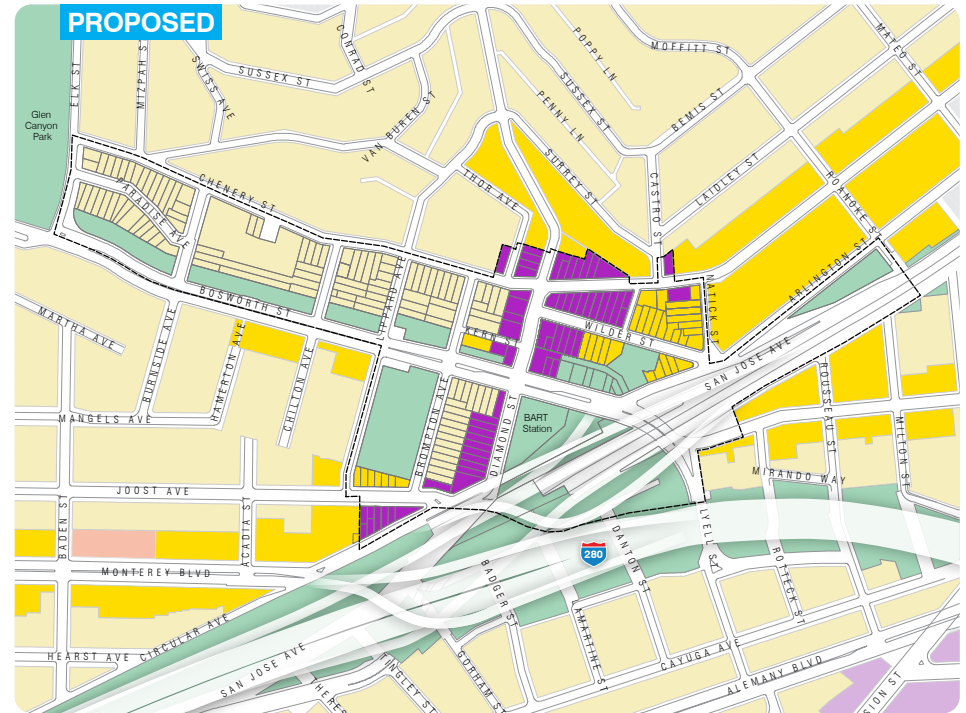
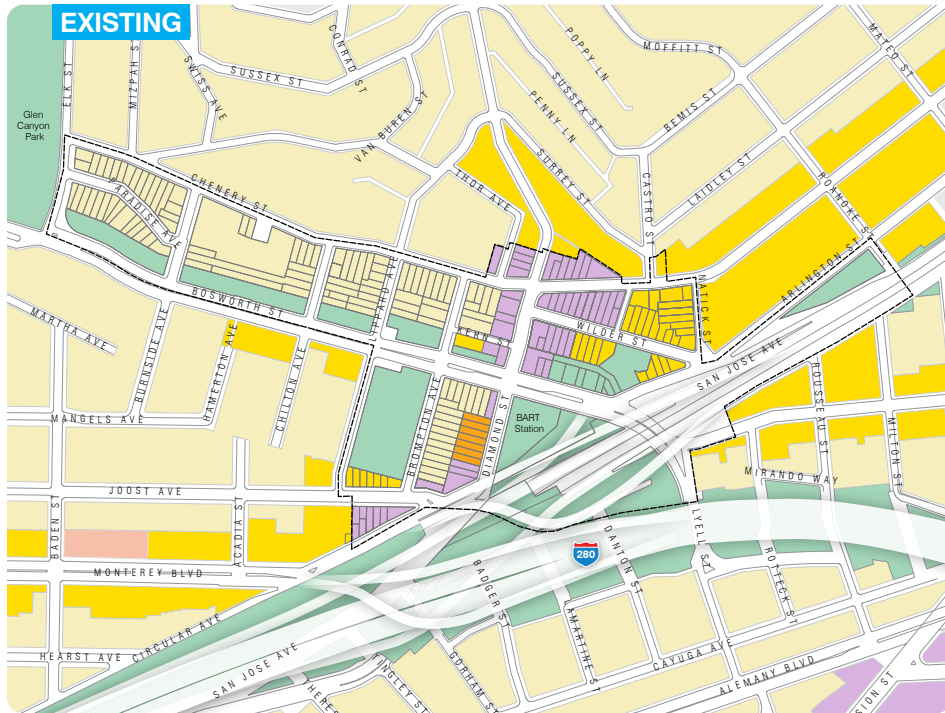
San Jose Avenue Redesign

The following implementation action language has been removed from the San Jose Avenue Redesign project category: “Design and construct major roadway and streetscape changes on San Jose Avenue to create an attractive boulevard that is better integrated into surrounding neighborhoods.

In addition, the following implementation action language has been changed in the San Jose Avenue Redesign project category: “Conduct a design and engineering study to determine feasibility of redesigning San Jose Avenue as a local street and attractive boulevard (with and without the removal of the Bosworth Street overpass) that is better integrated into surrounding neighborhoods.”

Glen Park Community Plan Zoning Proposal

DRAFT (SEPT 2011)



LAND USE DISTRICTS

	RH-1	Residential, one unit per lot
	RH-2	Residential, two units per lot
	RH-3	Residential, three units per lot
	RM-1	Low Density Residential
	NC-2	Small-Scale Neighborhood Commercial
	GP NCT	Glen Park N'hood Commercial Transit
	P	Public
	Glen Park Community Plan Boundary	

What is proposed to change?

The Plan recommends updating the existing neighborhood commercial district (NC-2) with a Glen Park Neighborhood Commercial Transit District (Glen Park NCT). This new zoning district recognizes Glen Park's unique identity, reflects the historic building pattern and supports an inviting pedestrian environment. It includes the following components:

- Height bonus (5') to allow taller ground floor storefronts but not another story of development.
- Flexibility in housing density and parking limits.
- Street frontage requirements: ground floor active uses, curb cut restrictions and setbacks for off-street parking.

What is not changing?

No changes are proposed for the publicly zoned (P) properties including the Glen Park Elementary School, BART properties, and parcels along Bosworth Street. Residential zoning will also predominantly remain intact except for changes described in box at right.

Additions to Glen Park's commercial district

The Department proposes adding three residentially zoned properties with LCUs (limited commercial uses) to the Glen Park NCT district. Given their historic commercial use and character, they represent a natural fit with neighborhood commercial zoning. This zoning change would formally recognize these properties as part of Glen Park's commercial district.



Osha Thai 2922-24 Diamond St	Destinations Bakery 3121-3125 Castro St	East-West Medicine 605 Chenery St
------------------------------------	-----------------------------------------------	--------------------------------------

Located across from the BART station, this row of residential (RH-3) apartment buildings forms a gap in the commercial district. Rezoning these properties to Glen Park NCT allows flexibility for possible ground floor commercial uses at some future time. This zoning change also would allow the buildings to remain as they are.

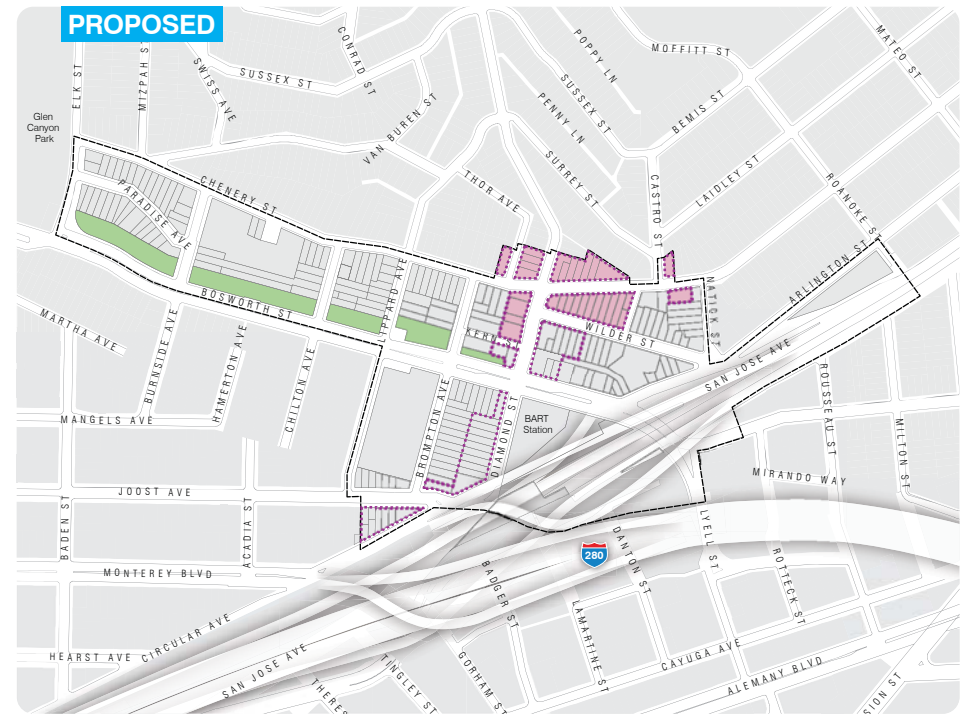
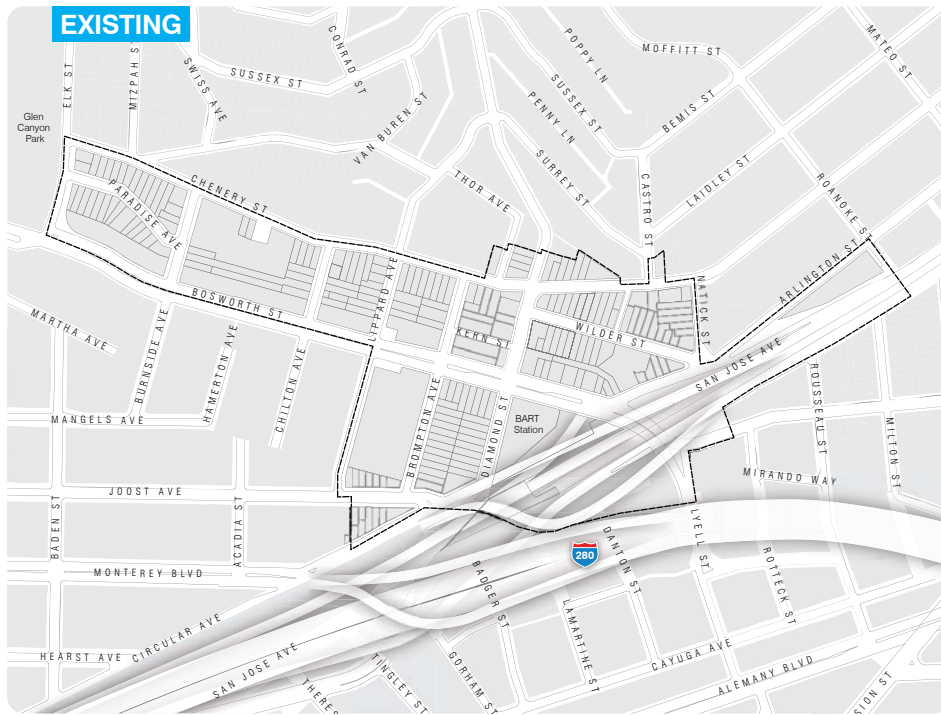


2928-2958 Diamond Street



Glen Park Community Plan Heights Proposal

DRAFT (SEPT 2011)



HEIGHT DISTRICTS

- 30-X
- 40-X
- OS (Open Space)
- Proposed Glen Park NCT District (additional 5' height bonus for active ground floor uses up to 35-X & 45-X respectively)
- Plan Boundary

Existing Heights

Currently, all of Glen Park and its surrounding area are located within a 40' height district. This typically allows up to four stories of development.

Proposed Height Adjustments

The fine-grained interior of Glen Park village is characterized by two and three-story buildings. These help create a comfortable pedestrian environment and define the street.

The Planning Department proposes reducing the maximum height of new construction within the interior of the "village" from 40' to 30' in acknowledgement of this pattern.

Taller ground floor storefronts are also encouraged by allowing a 5' height bonus for active uses throughout the Glen Park NCT District. This would permit maximum building heights of 35' and 45' depending on location.



Diamond & Chenery Streets



