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Planning Commission Draft Motion

HEARING DATE: MAY 15, 2014

Hearing Date:	May 15, 2014
Case No.:	**2011.1306E**
Project Address:	**1634-1690 Pine Street**
Zoning:	NC-3 (Neighborhood Commercial, Moderate Scale) Van Ness Automotive Special Use District 130-E Height and Bulk District
Block/Lot:	0647/007, 008, 009, 010, 011, and 011A
Project Sponsor:	Dean Givas, Oyster Development Corp. 355 1st Street, #809 San Francisco, CA 94105
Staff Contact:	Jeanie Poling – (415) 575-9072 jeanie.poling@sfgov.org

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED PROJECT THAT WOULD MERGE SIX LOTS, DEMOLISH MOST OF THE FIVE BUILDINGS ON THE PROJECT SITE, AND CONSTRUCT A 130-FOOT-TALL, 353,360-GROSS-SQUARE-FOOT BUILDING CONTAINING 262 RESIDENTIAL UNITS IN TWO 13-STORY TOWERS, 5,600 SQUARE FEET OF COMMERCIAL USE ON THE GROUND AND SECOND FLOORS, AND ONE LEVEL OF BELOW-GRADE PARKING FOR 245 VEHICLES AND 141 BICYCLES.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as Case No. 2011.1306E, 1634-1690 Pine Street (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 March 20, 2013.

   B. On October 2, 2013, 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 the project sponsor on October 2, 2013.

D. On October 2, 2013, 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 DEIR, 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 October 2, 2013.

2. The Commission held a duly advertised public hearing on said DEIR on November 7, 2013, 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 November 18, 2013.

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 Responses to Comments document, published on April 30, 2014, 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 Responses to Comments 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, Suite 400, and are part of the record before the Commission.

6. On May 15, 2014, 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. 2011.1306E, 1634-1690 Pine Street, reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Responses to Comments 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 Commission, in certifying the completion of said FEIR, hereby does find that the project described in the EIR:

A. Will have the following significant project-specific effects on the environment: (1) the demolition and *de facto* demolition of the buildings located at 1634–1670 Pine Street will cause a substantial adverse change in the significance of historic architectural resources, and (2) the project will cause a substantial increase in traffic that would cause the level of service at the intersection of Van Ness Avenue/Pine Street to decline from LOS D to LOS E in the AM peak hour and from LOS E to F in the PM peak hour.

B. Will have the following significant cumulative effects on the environment: (1) in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, result in significant cumulative impact on historic architectural resources; and (2) contribute considerably to future cumulative traffic increases that will cause levels of service to deteriorate to unacceptable levels.

9. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of May 15, 2014.

Jonas Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED: May 15, 2014

RESPONSES TO COMMENTS

1634–1690 Pine Street Project

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT
CASE NO. 2011.1306E

STATE CLEARINGHOUSE NO. 2007042045

Draft EIR Publication Date:	**October 2, 2013**
Draft EIR Public Hearing Date:	**November 7, 2013**
Draft EIR Public Comment Period:	**October 3, 2013 - November 18, 2013**
Final EIR Certification Hearing Date:	May 15, 2004

SAN FRANCISCO
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DEPARTMENT

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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DATE: April 30, 2014

TO: Members of the Planning Commission and Interested Parties
FROM: Sarah B. Jones, Environmental Review Officer
Re: Attached Responses to Comments on Draft Environmental Impact Report Case No. 2011.1306E: 1634-1690 Pine Street Project

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on May 15, 2014.** The Planning Commission will receive public testimony on the Final EIR certification at the May 15, 2014 hearing. Please note that the public review period for the Draft EIR ended on November 18, 2013; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

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

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Jeanie Poling 415-575-9072.

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

1634–1690 Pine Street Project

RESPONSES TO COMMENTS

Planning Department Case No. 2011.1306E

State Clearinghouse No. 2007042045

DRAFT EIR PUBLICATION DATE: October 2, 2013
DRAFT EIR PUBLIC HEARING DATE: November 7, 2013
DRAFT EIR PUBLIC COMMENT PERIOD: October 3, 2013 – November 18, 2013
FINAL EIR CERTIFICATION HEARING: May 15, 2014

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I. INTRODUCTION

A. PURPOSE OF THIS RESPONSES TO COMMENTS DOCUMENT

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (Draft EIR) for the proposed 1634–1690 Pine Street Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Section 21091(d)(2)(A) and (B), the City and County of San Francisco (the City) has considered the comments received, evaluated the issues raised, and herein provides written responses that address each substantive environmental issue that has been raised by the commenters. Comments were made in written form during the public comment period from October 3, 2013 to November 18, 2013, and as spoken testimony received before the Planning Commission at the public hearing on the Draft EIR held on November 7, 2013. A complete transcript of proceedings from the public hearing on the Draft EIR and all written comments are included in their entirety in the Appendices to this RTC document.

B. ENVIRONMENTAL REVIEW PROCESS

The San Francisco Planning Department prepared the Draft EIR for the 1634–1690 Pine Street Project in accordance with CEQA and the *State CEQA Guidelines* in Title 14 of the California Code of Regulations. The Draft EIR was published on October 2, 2013. A public comment period was then held from October 3, 2013 to November 18, 2013, to solicit public comment on the adequacy and accuracy of information presented in the Draft EIR. The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and spoken comments on the Draft EIR.

The Draft EIR, together with this RTC document, will be presented to the Planning Commission at a public hearing noticed in accordance with San Francisco Administrative Code Section 31.14(d)(3). If deemed adequate with respect to accuracy, objectiveness, and completeness, the EIR will be certified as a Final EIR. The Final EIR will consist of the Draft EIR, the comments received during the public review period, responses to the comments, and any revisions to the Draft EIR that result from public agency and public comments and from staff-initiated text changes. The City decision-makers will consider the certified Final EIR, along with other information and the public process, to determine whether to approve, modify, or disapprove the proposed project, and to specify any applicable environmental conditions as part of project approvals in a Mitigation Monitoring and Reporting Program.

If the City decides to approve the proposed project with significant effects that are identified in the Final EIR, but which are not avoided or reduced to a less than significant level, the City must indicate that

any such unavoidable significant effects are acceptable due to overriding considerations as described in *State CEQA Guidelines* Section 15093. This is known as a Statement of Overriding Considerations. In preparing this statement, the City must balance the benefits of a proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (*State CEQA Guidelines* Section 15093). If an agency makes a Statement of Overriding Considerations, the statement must be included in the record of project approval.

C. DOCUMENT ORGANIZATION

Following this Introduction Chapter, **Chapter II** presents the List of Persons Commenting. The List of Persons Commenting presents names of persons who spoke at the public hearing in the order of the speakers, followed by the names of persons who submitted written comments on behalf of public agencies, commissions, organizations, and individuals. (Written comments are collectively referred to as "letters" in this RTC document, but may include other written media such as e-mails and facsimile transmittals.)

Chapter III, Responses to Comments, presents the substantive comments on environmental issues, excerpted verbatim from the public hearing transcript and the comment letters. Comments are organized by topic area and similar comments are grouped together under topic headings and subheadings. However, to allow the reader to view the comments within their original spoken or written context, the complete transcript of the public hearing comments and the comment letters on the Draft EIR are included in the Appendices to this RTC document.

Complete spoken comments from the Planning Commission public hearing are presented in **Appendix A: Public Hearing Transcript Comments**. Transcript comments are identified by the designation "TR" and are bracketed and numbered sequentially, based on the order of speakers at the hearing and the order of each speaker's separate comments. Likewise, copies of the complete comment letters are presented in **Appendix B: Draft EIR Comment Letters**. Letter comments are identified by the designation "A" (for Public Agencies and Commissions), or "B" (for Organizations and Individuals) and are bracketed and numbered sequentially, based on the date of the letter, and the order of each separate comment within the letter. Letters with the same date are presented alphabetically according to the last name of the commenter.

Following each comment or group of comments on a topic are the City's responses. Comment groupings may be addressed by a single response. A response may contain a specific targeted response to a specific comment, or comments, where noted. The responses generally provide clarification of the Draft EIR text.

The responses may also include revisions or additions to the Draft EIR text. Such changes are shown as indented and single-spaced text, with new or revised text double underlined and deleted material shown as ~~strikethrough~~ text.

Chapter IV, Draft EIR Revisions, presents text changes to the Draft EIR that reflect text changes made in response to comments and staff-initiated text changes identified by San Francisco Planning Department staff to update, correct, or clarify the Draft EIR text. These changes have not resulted in significant new information with respect to the proposed project, including any new significant environmental impacts or new mitigation measures. Therefore, recirculation of the Draft EIR pursuant to *State CEQA Guidelines* Section 15088.5 is not required.

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II. LIST OF PERSONS COMMENTING

The Planning Commission held a public hearing about the Draft EIR on November 7, 2013, and individuals and Planning Commissioners made oral comments at that hearing. A list of persons who spoke at the public hearing is presented below, in the order of the speakers (designated by "TR," for transcript). During the public comment period from October 3, 2013 to November 18, 2013, the City also received written comments on the 1634–1690 Pine Street Project Draft EIR from public agencies, commissions, organizations, and individuals. A list of persons who submitted written comments is presented below.

A. PUBLIC HEARING COMMENTS

The following persons made oral comments about the Draft EIR at the public hearing on November 7, 2013:

Designation	Commenter
TR.1	Michael Disend
TR.2	Desiree Smith, San Francisco Architectural Heritage
TR.3	Patricia Lovelock
TR.4	Commissioner Michael Antonini, San Francisco Planning Commission
TR.5	Commissioner Gwyneth Borden, San Francisco Planning Commission
TR.6	Commissioner Hisashi Sugaya, San Francisco Planning Commission
TR.7	Commissioner Katherine Moore, San Francisco Planning Commission
TR.8	Vice President Cindy Wu, San Francisco Planning Commission

B. WRITTEN COMMENTS

The following persons submitted written comments about the Draft EIR during the public comment period of October 3, 2013 to November 18, 2013:

Designation	Commenter	Date of Written Comments
A. Public Agencies and Commissions		
A.1	Karl Hasz, President, San Francisco Historic Preservation Commission	October 17, 2013
A.2	Erik Alm, AICP, California Department of Transportation	November 1, 2013
B. Organizations and Individuals		
B.1	Jean Hansel	October 5, 2013
B.2	Joyce W. Finlay	October 15, 2013
B.3	Dan Bane	October 18, 2013
B.4	Roberta Wackler	October 28, 2013
B.5	Sue Vaughan, Sierra Club	October 30, 2013
B.6	Hella Cheitlin	November 3, 2013
B.7	Steven Kushner	November 5, 2013
B.8	Gerald D. Adams	November 6, 2013
B.9	Michael Disend 1	November 13, 2013
B.10	Michael Disend 2	November 13, 2013
B.11	Marlayne Morgan 1	November 17, 2013
B.12	Paul Wermer	November 17, 2013
B.13	Mike Buhler, Executive Director, San Francisco Heritage	November 18, 2013
B.14	I.L. Girshman	November 18, 2013
B.15	Marlayne Morgan 2	November 18, 2013
B.16	Nick R. Green, President, Citizens Advocating Rational Development	November 15, 2013

III. RESPONSES TO COMMENTS

This chapter summarizes the substantive comments received on the Draft Environmental Impact Report (EIR) and presents the responses to those comments.

A. ORGANIZATION OF RESPONSES TO COMMENTS

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

Project Description ..... PD
Historic Architectural Resources ..... CP
Transportation and Circulation ..... TR
Wind ..... WS
Alternatives ..... AL
General Comments ..... GC
Land Use & Land Use Planning ..... LU
Aesthetics ..... AE
Population & Housing ..... PH
Noise ..... NO
Air Quality and Greenhouse Gas Emissions ... AQ
Shadow ..... WS
Utilities and Service Systems ..... UT
Biological Resources ..... BI
Energy ..... ME

Within each section of this chapter under each topic area, similar comments are grouped together and numbered sequentially using the topic code prefix and sequential numbering for each subtopic. For example, comments on the Project Description [PD] are listed as [PD-1], [PD-2], [PD-3], and so on. Within each topic code and corresponding heading that introduces the comment subject are the quoted comments followed by the commenter's name and the commenter code. Commenter codes begin with "TR" for public hearing transcript comments in **Appendix A** or "B" for comment letters in **Appendix B**. Photos, figures, and other attachments submitted by commenters and referenced in individual comments are included in the applicable comment letter in **Appendix B**; they are not reproduced as part of the comments in this chapter.

For the full text and context of each comment, the reader is referred to **Appendix A: Public Hearing Transcript Comments**, and **Appendix B: Draft EIR Comment Letters**. Individual comments on separate topics from each commenter are bracketed and coded sequentially within the comment letters; the bracketed comments and corresponding comment codes are shown in the margins of the comments in **Appendices A** and **B**.

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

Corrections and/or clarifications to the Draft EIR are captured in the individual responses as well as in **Chapter IV, Draft Revisions**.

B. PROJECT DESCRIPTION

Comment PD-1 – Trash Containers

"How often will the trash be collected and what kind of containers will be used? Where will these containers be stored before they are rolled out to the curb? Trash containers on the sidewalk are both unsightly, unhealthy, and obstructive." (*Hella Cheitlin*) **[B.6.2]**

Response PD-1

The proposed project would utilize one 1.5-cubic yard container to collect trash, one 1.5-cubic-yard container to collect recycling material, and two 64-gallon "tote carts" to collect composting material. The trash and recycling containers would be collected four days a week while the composting containers would be collected 5 times per week. Trash containers for the proposed building would be stored in the basement level (see Figure II-12 in the Draft EIR located on p. II-17 for the exact location). The containers would be transported from the basement level via a plate jack to the driveway between the proposed project and the existing Chevron Station on the east side of the proposed building; they would be emptied by the collection trucks from this location.

Comment PD-2 – Height and Bulk Limits

"The Evans Company, the previous project sponsor for 1634–1690 Pine Street, had previously proposed to build a 238 unit condominium project, exceeding both height and bulk limitations for the area and creating significant negative environmental impacts for this neighborhood. After the Evans Company declared bankruptcy, the site remained vacant for a number of years, and neighbors were encouraged to hear that the new sponsor would be submitting a project which did not require significant variances and would enhance the character of this and surrounding blocks."

"Oyster Developments, the current project sponsor, is now proposing to construct a 262 unit, mixed use project. While nominally within heights limits, this box-like structure will also have significant negative impacts on this block of Pine Street, and in addition will generate 242 parking places, more than the original proposal if both are tied to one to one parking ratios." (*Marlayne Morgan 1*) **[B.11.1]**

Response PD-2

Please note that the previous project sponsor proposed a 283-unit condominium project that exceeded both the height and bulk limitations for the area. The currently proposed project would be below or meet the density, height, and bulk limitations for the area. Also please note that the

proposed project would provide 245 parking spaces. See pp. IV.B-47 to IV.B-51 of the Draft EIR for a discussion of parking, and p. 43 of the Initial Study for a discussion of aesthetics.

As discussed in **Draft Revisions** on p. RTC.IV-6, aesthetics and parking impacts are no longer to be considered in determining the significance of physical environmental effects under CEQA for urban infill projects meeting certain criteria. The proposed project meets these criteria; thus, aesthetics and parking discussions are provided in the Draft EIR for informational purposes only.

Comment PD-3 – Affordable Housing

"The DEIR does not address whether or not the project sponsors will address the affordable housing requirement by making 12-15% of their project into affordable, below market units, or if they will follow the more common course of either donating to the affordable housing fund or building affordable housing in a distant neighborhood themselves. Doing the latter would result in a different group of impacts as the neighborhood would have to accommodate a larger, wealthier group of residents and their multiple larger vehicles, greater use of resources, and increased traffic from the delivery services urban wealthy people tend to exploit." (*I.L. Girshman*) **[B.14.1]**

Response PD-3

As discussed in Chapter II, Project Description, located on p. II-8 of the Draft EIR, the project is subject to the City's Inclusionary Affordable Housing Program. The program requires that affordable housing be provided at 12 percent of the total number of dwelling units if provided on-site, or 17 percent if provided off-site. Alternatively, the project sponsor may pay an in-lieu Affordable Housing Fee. The project sponsor will be required to declare a method of compliance prior to project approval. The project will comply with affordable housing requirements.

Whether some of the units provided on the project site are affordable or not, the physical effects from the construction of the units on-site would be the same. Traffic and other impacts from developing and occupying the planned number of units on-site are fully analyzed on pp. IV.B-34 to IV.B.-65 of the Draft EIR using methodologies and assumptions approved by the City. It would be speculative to assume that in the event that affordable housing is not provided on-site, the households living in those units (12 percent of the total number of units) would have substantially greater environmental effects on the project vicinity than if those units were occupied by low-income households.

Comment PD-4 – Massing Diagram

"The DEIR falls short in providing illustrations and figures which would adequately convey the mass and bulk of the project. There is no massing diagram for the proposed project. Photo renderings do not display street level views of the shadow corridor created by the project on Pine Street between Van Ness and Franklin. Views of the backside of the project are not presented from street level. Users of the DEIR are not presented with a rendering which shows a common view of both sides of Pine Street and the 'tunnel' created by two 13 story bulks facing each other. A view of the project to be seen by southbound Van Ness users on both sides of Van Ness is not presented." (*I.L. Girshman*) **[B.14.14]**

Response PD-4

The aesthetic and shadow impacts of the proposed project are evaluated in the Initial Study, which found these impacts to be less than significant. A massing diagram is used to convey the height, size, and bulk of a proposed structure. Figures 18 through 22 on pp. 38 through 42 of the Initial Study (see Appendix A of the Draft EIR) illustrate the height, size, and bulk of the proposed structure and therefore are adequate for conveying the mass of the proposed project. These figures provide views of the project site from the viewpoint of a pedestrian and are typical for a project undergoing environmental review by the City.

As discussed in Section 9, Wind and Shadow, located on pp. 97 and 98 of the Initial Study, the project's shadow effects would be limited in scope and would not increase the total amount of shading above levels that are commonly and generally accepted in urban areas. No adverse shadow impacts would occur along Pine Street between Van Ness Avenue and Franklin Street. Also see **Response WS-5**, below, on p. RTC.III-62 for a discussion of shadow impacts.

C. HISTORIC ARCHITECTURAL RESOURCES

Comment CP-1 – Treatment of Historic Resources

"Good afternoon, Commissioners. My name is Desiree Smith. I am preservation project manager for San Francisco Architectural Heritage. We have a few comments today. And I just want to point out that our comments are limited to a discussion of the draft EIR's adequacy and accuracy regarding the discussion on cultural resources."

"As you know, the project site encompasses the entire Pine Street Auto Shops Historic District, which was identified by William Kostura in the City's 2010 survey of Van Ness Auto Row support structures."

"Van Ness Auto Row was one of the most influential automobile industry centers on the West coast during the 1910s and 1920s. The eligible Pine Street Auto Shops Historic District is the only example that comprises more than two auto-related buildings from the 1910s standing adjacent to one another in or near the Van Ness Auto Row corridor."

"Heritage strongly objects to the proposed treatment of historic resources under the proposed project. The vast majority of the historic district would be demolished and new construction would completely overwhelm the remnants to be retained, with virtually no setbacks to separate new construction from the historic façade."

"We agree with the Planning Department's determination that the project would result in significant adverse impacts to cultural resources including *de facto* demolition of the Pine Street Auto Shops Historic District and demolition of most of the existing five buildings on the project site, two of which are also individually eligible for listing on the California Register of Historic Resources."

"Furthermore, we agree with the Planning Department that implementation of proposed mitigation measures would not adequately compensate for the loss of historic resources." (*Desiree Smith*) **[TR.2.1]**

"Heritage strongly objects to the proposed treatment of historic resources under the proposed project. The vast majority of the eligible Pine Street Auto Shops Historic District would be demolished and new construction would completely overwhelm the remnants to be retained, with virtually no setback to separate new construction from the historic façades. We agree with the Planning Department's determination that the project would result in significant adverse impacts to cultural resources, including substantial demolition of all five contributors to the Pine Street Auto Shops Historic District, two of which are also eligible for individual listing in the California Register of Historic Resources (CRHR). Furthermore, we agree with the Planning Department that implementation of proposed mitigation measures would not adequately compensate for the loss of cultural resources."

"Located within the Van Ness Auto Row corridor, the five historic buildings targeted for removal help tell the story of one of the most influential automobile industry centers on the west coast in the 1910s–1920s. Many of the automobile distribution centers that operated along Van Ness Auto Row, in fact, partnered with local dealerships throughout California in order to service their wide customer base. In the years following the 1906 Earthquake and Fire, auto-related businesses moved to Van Ness Avenue and the surrounding blocks to take advantage of the ample space available to build large showrooms. The spacious showrooms of the era were often built in high-style architecture and served as the primary focus of the burgeoning Van Ness Auto Row. Other auto-related businesses followed the dealerships to the area in hopes of profiting from the new customer base in need of supplies, parts, tires, paint, repair

services, and parking. In total, over 200 auto-related buildings were constructed on or near Van Ness Avenue between Market Street and Pacific Avenue during the 1910s."

"The project site encompasses the entire Pine Street Auto Shops Historic District, identified by William Kostura in the City's 2010 survey of Van Ness Auto Row support structures. The Pine Street Auto Shops Historic District is "the only example that comprises more than two auto-related buildings from the 1910s standing adjacent to one another in or near the Van Ness Avenue Auto Row corridor." Historically, the five buildings housed auto-related enterprises, ranging from an automobile showroom to specialty service shops. The survey report concluded that the Pine Street Auto Shops Historic District is eligible under CRHR Criteria 1 (Events) and 3 (Architecture) within the context of the Van Ness Auto Row support structures. Heritage agrees with the Planning Department's findings that the proposed project would result in the *de facto* demolition of the Pine Street Auto Shops Historic District." (*Mike Buhler*)**[B.13.1]**

Response CP-1

This comment does not raise any specific environmental issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts, but rather states objections to the proposed project. It should be noted that the Partial Preservation Alternative and Full Preservation Alternative analyzed on pp. VI-7 to VI-42 of the Draft EIR would have setbacks to separate new construction from the historic façades. It should also be noted that the Full Preservation Alternative would incorporate all of the existing building façades and substantial portions of the extant buildings and thus avoid *de facto* demolition of the buildings as defined by *Planning Code* Section 1005(f).

Comment CP-2 – Compatibility with Historic District

"Additionally, it does a terrible job of preserving the landmark. I don't know how you think it makes any sense to put modern structures in the middle of a historic district. They're not keeping the buildings together. They're interspersing them with the modern face and cutting significant trees." (*Patricia Lovelock*) **[TR.3.5]**

Response CP-2

This comment does not raise any specific environmental issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts, but rather states objections to the proposed project. The five buildings on the project site are an eligible historic district but are not landmark buildings as identified in Article 10 of the Planning Code. Project impacts to the Pine Street Auto

Shops Historic District are discussed in Section IV.A, Cultural and Paleontological Resources, of the Draft EIR. As discussed on p. IV.A-22 the proposed project would result in the district losing its ability to convey its historic significance, and even with mitigation this impact would be significant and unavoidable.

As discussed in Chapter II, Project Description, located on p. II-20 of the Draft EIR, all of the street trees along Pine Street would be retained while the trees located in the existing parking lot would be removed during project construction. As discussed in Section 13, Biological Resources, located on pp. 109 through 110 of the Initial Study (see Appendix A of the Draft EIR), three of the trees located in the existing parking lot are considered significant trees under legislation adopted by the San Francisco Board of Supervisors. As a result, the project sponsor would need to obtain a tree removal permit from the Department of Public Works (DPW) for those three trees, and the proposed project would need to meet DPW's requirement of one-to-one replacement for protected trees.

Comment CP-3 – Effectiveness of Retaining Façades

"In the analysis of the proposed project, not the alternatives, I think that the conclusion that there's substantial adverse impacts that can't be mitigated is correct, in that there isn't a whole lot that we can do in terms of preservation of those buildings if the proposed project moves ahead as it is designed."

"But what I'd like to inject is that – my belief is that façadism and the retention of the three building elevations does nothing. It doesn't increase the impact. It sort of tries to say it decreases the impact, but it's still an adverse impact. And if it's still an adverse impact, I think when the project comes around to the Commission, there ought to be a design that eliminates those façades. That approach to me went out decades ago and isn't a preferred approach to preserving historic structures, I don't think, anymore."

"If you want to see one, there are examples around San Francisco, 10th and Folsom is a David Baker-designed project that retains one storefront -- not storefront -- warehouse front. I believe it is in brick. I think it looks -- I won't say the word. It looks terrible and does nothing to enhance the fact that that was once a historic building."

"There's another one over on Sacramento and Sansome or Front, over that direction, which is retention of a corner piece of a building with an office high-rise behind it, or mid-rise behind it. So there are examples like that around that I don't think work at all." (*Planning Commissioner Sugaya*) **[TR.6.1]**

Response CP-3

This comment does not raise any specific environmental issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts. Please note that the Draft EIR contains the required alternatives per the California Environmental Quality Act (CEQA). As a result, it is not necessary to include an alternative that eliminates all of the three façades that would be retained by the proposed project. An alternative that eliminates all of the façades was not provided because it would not decrease the project's impacts with regard to historic resources as compared to other alternatives discussed in the Draft EIR.

Comment CP-4 – Historical Context

"Yeah. Another area that I agree with Commissioner Moore and it is addressed in the DEIR on pages 4-A-21 and 4-A-22 on historical architectural resource impacts. And most particularly the very last one says construction of an incompatible building within the boundary of the Pine Street Auto Shops Historic District."

"And while this is more of a design issue, it is an issue that becomes under the context of the EIR because the EIR deals with historical preservation and impacts. And an impact of a building that does not have any context or little context with the existing auto shops makes it even more of an impact. If the building had more features, such as masonry or others, that would make it more compatible with whatever is kept of those buildings, it would probably be less of an impact."

"Whether you like it or not, the towers across the street have been built in the style that is somewhat reminiscent of the Van Ness area rather than being completely glassy new towers. So I think something along that line should be included in comments-and-responses what could be done to make the two, especially if the new building would be weaved in between what remains of the historic buildings. As someone pointed out, makes it even more of a contrast and I think better context particularly on the Pine Street façade would help a lot." (*Planning Commissioner Antonini*) **[TR.4.6]**

"The Historic Preservation Commission recognizes that preservation options for a development of this proposed density are rather limited. That said, a project that renders the district ineligible for California Register is of great concern."

"The proposed project would entirely demolish two of the three historic buildings on the project site. It seems that the project sponsor should be able to preserve at least the façades of those two buildings, as is

the case under the preservation alternatives. Even though this would be "façadism," it is preferable to wholesale demolition." (*Historic Preservation Commissioner Karl Hasz*) **[A.1.1]**

"Page 25 of the pdf: The DEIR accepts the complete demolition of 2 of the 5 façades that comprise the historic Pine Street Auto Row. The loss of the context established by the 5 historical adjacent structures that reflect the original use should be avoided. Unfortunately, the proposed mitigations do not consider that, nor do any of the DEIR alternatives seriously consider that option. M-CP-4d would be far more effective if the historic sequence of façades was preserved, rather than destroyed by removing 2/5 of the façades. This would better communicate the scale both of the buildings and the enterprises that were critical to San Francisco's development in the early 20th century, as well as the significance of the automobile on the development of the city and its roadways (such as Van Ness). The DEIR is inadequate in that it fails to consider serious alternatives to preserve the full 5 façades. It is important to respect the fact that the historical importance derives from story told by the historic building, not the mere façades in themselves. To accurately tell the story, all façades are needed." (*Paul Wermer*) **[B.12.4]**

Response CP-4

According to the *Secretary of the Interior's (SOI) Standards*, each property should be recognized as a physical record of its time, place, and use. For this reason, design features that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, should not be undertaken. In addition, adding features, such as masonry, to the proposed project to make it more compatible with the façades of the buildings to be retained or to make it similar to the San Francisco Towers building across the street would still not eliminate the significant and unavoidable impacts to historical architectural resources, as construction of the proposed project would still result in the *de facto* demolition of the buildings as defined by *Planning Code* Section 1005(f).

Please note that the proposed project would entirely demolish two of five buildings (1650 and 1656 Pine Street) that contribute to the eligible Pine Street Auto Shops Historic District. The project would also demolish most of two buildings (1634-1644 and 1670 Pine Street) that are individually eligible for listing.

Both the Partial Preservation Alternative and the Full Preservation Alternative preserve the façades of all five buildings on the project site, and thus preservation of all five façades was taken into consideration by the alternative analysis presented on pp. VI-7 to VI-42 of the Draft EIR. As that analysis shows, even with the preservation of all five façades, the Partial Preservation Alternative would result in a significant and unavoidable impact on historic architectural

resources, and only the Full Preservation Alternative, which would preserve the five façades and avoid the *de facto* demolition of the historic structures, would result in a less than significant impact on historic architectural resources. Please note that Mitigation Measure M-CP-4d requires the project sponsor to install permanent interpretive exhibits on the property that provide information to visitors and occupants regarding the history of the Pine Street Auto Shops Historic District and the development of the Van Ness Auto Row and does not require the retention of the façades. The retention of the façades is a component of the project.

Comment CP-5 – Role of Previous Owner in Supporting the City's Japanese Community during World War II

"My family owned three properties of the parcel since 1929, where the family business served the San Francisco Bay Area. Enclosed is an article written about the business, which respects its history and contribution. My father, uncle, and grandfather have passed away and selling the business was certainly inevitable. I reviewed the prospective plans for the entire site and tears came to my eyes. You and the architect firm of Kwan Henmi preserved the spirit and beauty of the old brick buildings. I cannot tell you how much that means to my family."

"Deovlet and Sons furniture store supported the Japanese community during the time of the internment camps, in the 1940s, by storing their belongings during such an unfortunate time. There are countless stories about the history of the 1600 block of Pine Street. I have some old pictures you may be interested in seeing."

"I thoroughly support your plans of development and deeply respect your preserving the history of my family's lineage and history of San Francisco." (*Roberta Wackler*) **[B.4.1]**

Response CP-5

The commenter's support for the proposed project's design is noted. The new information related to the role of the Deovlet family in supporting the Japanese community during the time of internment camps during the 1940s is relevant to the historical context of the property, which includes the age and past uses of the project site and surrounding properties, and will be included during implementation of Mitigation Measure M-CP-4c: Historic Resource HABS Documentation, and Mitigation Measure M-CP-4d, Permanent Interpretive Exhibits. These mitigation measures require documentation of the buildings on the project site, including measured drawings, photography and a historical report, and require the project sponsor to install permanent interpretive exhibits on the property to provide information to visitors and occupants regarding the history of the Pine Street Auto Shops Historic District and the

development of the Van Ness Auto Row. Information related to the role of the Deovlet family in supporting the Japanese community during the time of internment camps during the 1940s has been added to a discussion of the project site's historical setting on p. IV.A-5 of the Draft EIR. This addition does not alter any of the conclusions of the EIR.

> In 1942 at the beginning of World War II, the owners of 1660 Pine Street stored the personal belongings of their Japanese-American neighbors just before they were sent to internment camps in the western United States. The belongings were stored in locked compartments on the third floor of the building. After the war, all of the items were safely returned to their owners.[1]

In addition, a requirement to include a discussion of the buildings' role during the period of Japanese-American internment during World War II to the permanent interpretive exhibits on the property has been added to Mitigation Measure M-CP-4d, Permanent Interpretive Exhibits, on p. IV.A-24 of the Draft EIR. This addition does not alter any of the conclusions of the EIR.

> **Mitigation Measure M-CP-4d: Permanent Interpretive Exhibits**
>
> The project sponsor shall install permanent interpretive exhibits on the property that provide information to visitors and occupants regarding the history of the Pine Street Auto Shops Historic District, ~~and~~ the development of Van Ness Auto Row, and the buildings' association during the period of Japanese-American internment during World War II. The interpretive exhibit shall utilize images, narrative history, drawings, or other archival resources. The interpretive exhibits may be in the form of, but are not necessarily limited to plaques or markers, interpretive display panels, and/or printed material for dissemination to the public. The interpretive exhibits shall be installed at a pedestrian-friendly location, and be of adequate size to attract the interested pedestrian.

Comment CP-6 – Efficacy of Mitigation to Preserve Historic Structures

"The DEIR proposes to mitigate the loss of the historic Pine Street Auto Shops by preserving only the façades of those 4 contiguous buildings. However, despite a 10 year period of neglect and vandalism of the buildings, they also still contain now-rare mid-century commercial interiors, including graceful, well-appointed sales floors, interior open stairways to more richly appointed upstairs office spaces, and back-

1 Beyer, Joe, "A Family Name Fades Away – For 67 years, Pops Deovlet and Suns Furnished the Neighborhood," *New Fillmore*, December 2007.

office spaces with similar rich decoration indicative of public commerce and sales spaces. (A similar interior space, designed and evocative of the Art Deco 1920s, was forever lost when the Ellis Brooks Chevrolet showroom on Van Ness became a stripped down Nissan dealership.)"

"M-CP-4d indicates "permanent interpretive exhibits" on the property, but does not specify their form, location or size. Will they be small lobby display cases, a plaque on the outside of the building, some paper leaflets available to peruse, etc.? They will be installed at a "pedestrian-friendly location" but owing to the project's traffic, wind and shadow impacts, it is not clear where or even if such a location will ever exist."

"In general the mitigation measures taken with regard to the great loss of the century-old last 4 remaining contiguous buildings of San Francisco's historic Auto Row are simply a cosmetic paper trail excusing their destruction. The analysis of the Full Preservation Alternative in this area is perfunctory and inconclusive, when it is the only way to non *de facto* demolition. It is inexcusable and cynical to merely preserve the façades of these workaday San Francisco spaces. Reading about history or even sharing digital files about it in no way mitigates the loss and wasteful destruction of these evocative structures." (*I.L. Girshman*) **[B.14.2]**

Response CP-6

Please note that the façades of only three buildings (1634-44, 1660, 1670 Pine Street) would be retained by the proposed project. The interior spaces were not identified as character-defining features of either the individually significant buildings on Pine Street or of the contributing buildings within the identified historic district. Typically only primary public interior spaces, such as hotel lobbies or theater auditoriums, are considered to be character-defining features of historic buildings. Retail spaces are rarely identified as significant due to their often-temporary nature. Regardless, the building interiors would be documented as part of Mitigation Measure M-CP-4d: Permanent Interpretive Exhibits, as discussed on pp. IV.A-24 to IV.A-25 of the Draft EIR, in order to fully capture the buildings' existing conditions. Details of what is to be included in the permanent interpretive exhibits would be developed and submitted by the project applicant to the City before implementation. The form, location, and size of the permanent interpretive exhibit would not be determined until that time to allow for flexibility. The Draft EIR acknowledges that the mitigation measures would not fully avoid or reduce the significant impact to historic architectural resources to a less than significant level, and concludes that the impact on historic architectural resources would be significant and unavoidable.

The commenter claims that the Draft EIR's analysis of the Full Preservation Alternative is perfunctory and inconclusive, but provides no specific reasons to support this assertion. The Draft EIR on pp. VI-25 to VI-42 provides a complete description and analysis of the Full Preservation Alternative and uses the Planning Code to evaluate the impacts of this alternative with respect to historic architectural resources. The Full Preservation Alternative would incorporate all of the existing building façades and substantial portions of the extant buildings and thus avoid *de facto* demolition of the buildings as defined by *Planning Code* Section 1005(f), and result in a less than significant impact on historic architectural resources. In addition, Mitigation Measure M-CP-4a: Historic Preservation Plan and Protective Measures, Mitigation Measure M-CP-4b: Historic Resource Baseline Condition Study, Mitigation Measure M-CP-4c: Historic Resource HABS Documentation, and Mitigation Measure M-CP-4d: Permanent Interpretive Exhibits, described fully on pp. IV.A-23 to IV.A-25 of the Draft EIR, would be implemented under the Full Preservation Alternative to further reduce the impact.

D. TRANSPORTATION

Comment TR-1 – Increased Effect of Vehicle Traffic on Hazardous Conditions

"I'm not a professional agitator. I belong to no political group. But I have to tell that you something that really changed my mind happened within the last four weeks. At 7:00 a.m. I heard what sounded like a bomb go off. I went outside my house. And on the corner of Pine and Gough a boy -- you probably read about it in the paper -- had been hit by a car going at a tremendous rate of speed. He died and the mother and sister were injured."

"Now, that type of traffic never took place before on Pine Street. Now, day and night it's like an inferno of cars and noise beginning about 4:00 or 5:00 a.m. and going on into the evening."

"To propose what you're proposing here, a garage with 245 more cars and then to have all this construction going on around us, is one more attack on the fiber and soul of San Francisco." (*Michael Disend*) **[TR.1.3]**

"I can't imagine how you're going to put 245 additional cars on Pine Street or the corner of Pine and Franklin. Franklin's traffic is bad most of the day now and there's a gas station at the corner of Pine and Van Ness that empties onto Pine right where the garage door is supposed to be for the new building." (*Joyce W. Finlay*) **[B.2.1]**

"As a resident on Pine Street between Franklin and Gough since 1997 I have witnessed this once calm and lovely NEIGHBORHOOD turn into a cold, jam packed extension of a super highway. I reminded the board when I spoke before them recently of the 16 year old boy who was killed by a car racing up Pine Street at speeds exceeding 85 mph. It was around 7 am several weeks ago when the car hit the vehicle he was in. It sounded like a bomb going off. I rushed outside and saw his body in the street. It was horrifying to all of us in the building because it represents in a tragic way how much insane traffic there is now on Pine, Franklin, and Gough throughout the day. The roaring noise is ceaseless, the stream of cars, buses, and trucks seemingly endless."

"Yet the proposed Pine/Franklin project in its EIR proposes 245 more parking spaces for resident vehicles! That's crazy. That's madness. Across the street is an assisted living facility filled with frail seniors who walk to Whole Foods and have to now already tread carefully through the mad traffic jam. Plus the garage entrances are not set back sufficiently, if at all. Clearly, other automobile fatalities and injuries can or will happen. It's just a matter of time. Also, the noise level will be unendurable for all of us residents, especially seniors." (*Michael Disend 1*)**[B.9.1]**

"As a resident on Pine Street between Franklin and Gough since 1997 I have witnessed this once calm and lovely NEIGHBORHOOD turn into a cold, jam packed extension of a super highway. I reminded the board when I verbally spoke on November 13 of the 16 year old boy who was killed by a car racing up Pine Street at speeds exceeding 85 mph. It was around 7 am when the car hit the vehicle he was in. It sounded like a bomb going off. I rushed outside and saw his body in the street. It was horrifying to all of us in the building because it represents in a tragic way how much insane traffic there is now on Pine, Franklin, and Gough throughout the day. The roaring noise is ceaseless, the cars, buses, and trucks seemingly endless."

"Yet the proposed Pine/Franklin project in its EIR proposes over 200 more parking spaces for resident vehicles! That's crazy. That's madness. Across the street is an assisted living facility filled with frail seniors who walk to Whole Foods and have to now already tread carefully through the mad traffic jam. Plus the garage entrances are not set back sufficiently, if at all. Clearly, other automobile fatalities and injuries can or will happen. It's just a matter of time. Also, the noise level will be unendurable for all of us residents, especially seniors." (*Michael Disend 2*)**[B.10.1]**

Response TR-1

The accident that occurred on September 27, 2013 was the result of excessive speeding that occurred during off-peak hours when surrounding traffic volumes were low.[2] Although the project would add traffic to Pine Street and other nearby streets, all vehicles and drivers travelling to and from the project site are required to adhere to posted speed limits. As a result, vehicle traffic from the proposed project would not change existing conditions on neighboring roadways with regard to vehicle speeds.

With respect to potential hazardous conditions related to ingress and egress to the project site and line-of-sight for drivers exiting the project site, as discussed on pp. IV.B-30 of the Draft EIR, the anticipated volume of inbound vehicles during peak activity periods would be 30 vehicles during the weekday AM peak hour and 96 vehicles during the weekday PM peak hour. The driveway to the proposed project garage would provide approximately 100 feet of vehicle queuing space, allowing as many as five vehicles to queue on the ramp without spilling back onto Pine Street. Queues would not be expected to spill on to Pine Street. Adequate sight distance would be provided such that vehicles exiting the driveway would have an unobstructed view to the Van Ness Avenue/Pine Street intersection.

The proposed garage driveway along Pine Street would be located approximately 125 feet west of the Van Ness Avenue/Pine Street intersection, and would be separated from the gas station driveway by an existing driveway with a curb cut measuring approximately 10 feet in width. Vehicular access to these three driveways would be right-turn in and right-turn out only due to Pine Street being a one-way westbound operating roadway. As such, this would simplify the movements to and from the driveways, thus minimizing the potential for vehicle-to-vehicle conflicts. The signalized intersection of Van Ness Avenue/Pine Street (including pedestrians crossing Pine Street at the west side of this intersection) would provide adequate gap opportunities for vehicles exiting the driveway of the gas station and that of the proposed project. Audible and visible warning devices would be installed to alert pedestrians (and vehicles exiting the gas station) of vehicles exiting the proposed project's driveway.

Traffic noise was analyzed in detail in Section 6, Noise, located on pp. 56-57 of the Initial Study (see Appendix A of the Draft EIR). The analysis concluded that traffic generated by the proposed

2 Alexander, Kurtis and Henry K. Lee, "Speeding Car Rams Minivan in S.F. - Boy, 16, Dead," *San Francisco Chronicle*, September 27, 2013, Online Edition. Available at: http://www.sfgate.com/bayarea/article/Speeding-car-rams-minivan-in-S-F-boy-16-dead-4849070.php.

project would not increase traffic volumes to a degree that would cause a noticeable increase in noise levels.

Comment TR-2 – Level of Service Variations at Intersections in the Neighborhood

"I have been looking at the draft EIRs of a number of projects in my neighborhood and became very interested in the statistics that were given as far as the LOS for the different intersections. And in comparing either some proposed ones or the older ones or the ones that are coming now, or California Pacific Medical Center (CPMC), most of them had at least three intersections in common. And it was very interesting how widely variant the numbers were, from like a C to an E or an F with another. So I think there is something very wrong with the reliability of that statistic." (*Patricia Lovelock*) **[TR.3.1]**

Response TR-2

The commenter does not cite any specific reports or intersections so the City is unable to verify the accuracy of the commenter's statement regarding variations in the reported level of service (LOS) at the same intersections in various Draft EIRs for projects in the area.

The LOS at a given intersection is estimated based on existing and projected traffic volumes at the intersection. The existing volumes will vary with each study as the volumes are based on traffic counts, which determine the number of vehicles that pass through an intersection at a given time. The counts are often done anew for each project when existing counts are deemed out-of-date or otherwise not appropriate to rely upon. The projected volumes are also periodically updated as they are based on anticipated patterns of growth in the area. As a result, LOS estimates for the same intersection can differ from one study to another depending on when the analysis was conducted. The variations in LOS results found in the draft EIRs for projects in the neighborhood may be attributed to differences in:

- The year and time of day the LOS analyses were performed for the EIRs for projects in the neighborhood, using traffic data collected from various dates and times.
- Traffic count data and existing vehicular volumes on the roadways and at intersections – which typically fluctuate by day of week, by month of year, and by seasonality.
- Analysis software – The Traffix software package was used for analyses included in the 1634–1690 Pine Street TIS, while the Synchro software package may have been used in the other studies. Both are considered professionally acceptable, though the results may vary slightly.

Traffic counts for all study intersections analyzed in the TIS[3] prepared for the proposed project were collected in April 2012, and methods listed in the *San Francisco Transportation Impact Analysis Guidelines* were utilized to conduct the traffic analysis in the TIS. The TIS was then reviewed and approved by San Francisco Planning Department. As a result, the analysis and LOSs that are reported in the TIS are correct and representative of conditions that exist at the present time and conditions that are projected for the area based on anticipated growth.

Comment TR-3 – Calculation of Fair Share Fees for Van Ness Avenue Bus Rapid Transit

"The second is more detailed. It's the question about there's instruction to pay into the Van Ness Avenue BRT at a fair share. And so my question is how a fair share is calculated and what is put into that calculation." (*Planning Commissioner Wu*) **[TR.8.2]**

Response TR-3

Implementation of Mitigation Measure M-C-TR-1, located on p. IV.B-59 of the Draft EIR, would require the project sponsor to be responsible for making a fair-share contribution to the cost of any improvement(s) at the Van Ness Avenue/Pine Street intersection deemed necessary by the San Francisco Municipal Transportation Agency in the near-term, defined as the period between Existing (2013) Conditions and implementation of the Van Ness Avenue Bus Rapid Transit Project (in 2018 or later). Mitigation fees would be imposed in accordance with State law (California Government Code Section 66000 et seq.), which allows a city to impose a fee on private development projects to defray costs of improvements to public facilities. A nexus study would be undertaken to determine that (1) there is a direct relationship between the impact created and the fee imposed, and (2) the fee is roughly proportional to the impact created by the project.

Typically, a fair share contribution is calculated in two parts. First, the overall cost of the transportation improvement projects is calculated for the list of infrastructure improvement projects that have been identified by an area-wide transportation study which includes all the projected growth in land uses within the study area. Second, the proportionate amount of the total cost is evaluated with respect to the proposed project's contribution to the total increase in traffic volumes at the impacted facility, as measured by the increase in traffic from the Existing (2013) Conditions to the 2035 Cumulative Conditions.

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3 AECOM, *1634 Pine Street Final Transportation Impact Study*, prepared for the City and County of San Francisco Planning Department, Environmental Planning Division, April 5, 2013. This report is available for review in File No. 2011.1306E at the Planning Department, 1650 Mission Street, 4th Floor.

The fair share (in terms of the automobile mode) is determined by the number of vehicles added by the proposed project to the affected facilities (intersections, roadways, or transit facilities). Since the total aggregate number of vehicles is known at a given location (by the 2035 Cumulative Conditions traffic volumes and/or in the case of San Francisco, by the percentage of added vehicles to a critical movement at an affected location), the percentage of added vehicles to a particular movement (that is considered critical) by the proposed project is the percentage contribution of the impact. The assessment of the impact fees (fair share contribution) is based on the vehicular traffic volume added by the proposed project and the determined fee structure, which stipulates the payable fees determined as a percentage of the total costs of the capital/infrastructure improvements. The fee structure is relative to the total cost of the capital/infrastructure improvements fees, and would require the undertaking of a "Nexus Study," which establishes the legal relationship, or "nexus" for which a fee is assessed for developments for the purpose of capital or infrastructure improvements.

Comment TR-4 – Changes in Traffic Patterns due to the Van Ness Avenue Bus Rapid Transit

"People in this neighborhood, as you heard the other person say, are very concerned about traffic, very concerned. We have so many injuries there. I've been pushing to get changes. We've gotten some changes, but people continue to get hit. So the number of cars going through there, especially with CPMC coming in and the bus rapid transit, their traffic analysis does not appear to take into account the fact that, now that they are not going to allow the left turns from Van Ness, that people are maybe going to be using Franklin to make left-hand turns up into the neighborhoods. That's pushing more and more traffic -- BRT already was going to push more traffic on Franklin and Gough. But now with the lack of the left-hand turns it's going to push even more. And these are residential areas. And so something needs to happen where people look at those statistics and try to figure out what is really accurate, because it goes all the way to gridlock." (*Patricia Lovelock*) **[TR.3.2]**

"Page 126 and p. 149 of the pdf: It does not appear that the traffic study as described on IV.B-6 and IV.B-29ff comprehended changes in driver behavior to be expected if the Van Ness Avenue BRT project prohibits most left turns from Van Ness. To what extent might that increase traffic at the Van Ness intersections? It is reasonable to expect that drivers making a series of right turns instead of a left would increase traffic at the Van Ness intersections, yet this is not discussed as a possible interaction aggravating future problem." (*Paul Wermer*) **[B.12.7]**

"Page 126 and p. 149 of the pdf: It does not appear that the traffic study as described on IV.B-6 and IV.B-29ff comprehended increase of traffic on Van Ness intersections if the Van Ness Avenue BRT project

prohibits most left turns from Van Ness. It is reasonable to expect that drivers making a series of right turns instead of a left would increase traffic at the Van Ness intersections, yet this is not discussed as a possible interaction aggravating future problems." (*Marlayne Morgan 2*) **[B.15.4]**

Response TR-4

As discussed in Section IV.B, Transportation and Circulation, located on p. IV.B-54 of the Draft EIR, the traffic analysis under Cumulative 2035 Conditions takes into account changes in traffic patterns due to the implementation of the Van Ness Avenue BRT. With implementation of the Van Ness Avenue BRT project, some drivers would be expected to change routes, or divert, from Van Ness Avenue to parallel streets due to the reduction in overall roadway capacity on Van Ness Avenue, as well as the reduction in left-turn opportunities from Van Ness Avenue. Drivers would be expected to utilize parallel facilities, including Gough Street, Franklin Street, and Polk Street, to access the proposed project. The redistribution of traffic along east/west streets and parallel facilities under 2035 Cumulative Conditions considered analysis results from the studies completed by the San Francisco County Transportation Authority (SFCTA) for the Van Ness Avenue BRT EIR. The projected distribution patterns (before and after BRT project implementation) were compared to and adjusted accordingly to ensure consistency with the Van Ness Avenue BRT. The analysis in the Draft EIR found that all of the study intersections would operate at acceptable conditions (LOS D or better) under 2035 Cumulative Conditions.

Comment TR-5 – Addition of an Additional Traffic Scenario

"It's not clear when this development would be ready for occupancy, particularly in relation to the Van Ness Bus Rapid Transit project. If it is within the approximate timeframe, the "Existing Plus Project" and "2035 Cumulative" conditions do not adequately evaluate traffic impacts. Also, please include a third scenario, "Existing Plus Project & Near-term Network Changes" conditions that evaluates the expected impacts before the 2035 horizon. "Near-term Network Changes" would include the Van Ness Bus Rapid Transit project and any other planned network changes that would be expected at that time." (*Erik Alm*) **[A.2.1]**

Response TR-5

The construction of the proposed project and the Van Ness Avenue BRT project are not expected to overlap in the near-term, as the current projected in-service date for the Van Ness Avenue BRT Project is early 2018, while the proposed project is targeted for occupancy in October 2016. Should the proposed project's timeline slip and its construction overlap with that of the Van Ness Avenue BRT, construction activities would need to be coordinated to reduce the impacts of

construction traffic in the vicinity of the project site. Implementation of Improvement Measure I-TR-9b: Coordination of Construction Activities, located on p. IV.B-53 of the Draft EIR, would reduce or avoid potential overlapping construction impacts that were determined to be less than significant.

With respect to operational impacts of the proposed project, those impacts are appropriately analyzed under Existing plus Project scenario because the project is expected to be occupied before BRT goes into effect. The operational impacts of the proposed project plus the Van Ness BRT are appropriately addressed under the Year 2035 Cumulative Conditions scenario, which would result in the most restrictive roadway network configurations, and thus represents the most conservative roadway and intersection operating conditions. It would be redundant to include an "Existing Plus Project & Near-term Network Changes" analysis scenario. The Year 2035 Cumulative Conditions traffic volumes would be consistently higher than those projected of the Opening Year of the Van Ness Avenue BRT. Since there were no significant impacts found for any of the study intersections in the Year 2035 Cumulative Conditions, which included Van Ness BRT project roadway network changes, it is reasonable to conclude that the impacts under a Near-term scenario would be substantially less and also less than significant. An interim year plus Project with Van Ness Avenue BRT project analysis is not required.

Comment TR-6 – Increased Risks Due to Driver Frustration

"Page 308 of the pdf, Initial Study p. 53: Impact TR-2 falsely assumes that only roadway engineering introduces risks. This ignores the frequently observed behavioral changes in frustrated drivers that increase high risk driving actions. Congestion and obstructions resulting from inadequate driveway and visitor drop-off design need to be evaluated in light of TR-2." (*Paul Wermer*) **[B.12.3]**

Response TR-6

As noted on p. II-20 of the Draft EIR, the proposed project would eliminate a curb cut on the Franklin Street and two curb cuts on Pine Street and would provide commercial vehicle loading and visitor pick-up/drop-off loading spaces in the parking lane (outside of the travel way) on the north side of Pine Street. This frontage space is not subject to peak hour tow-away restrictions. As such, the proposed loading and drop-off zone would not result in congestion or obstruction and would not be expected to contribute to driver frustration or increase high-risk driving actions. Additionally, Improvement Measures I-TR-4b: Limited Loading Hours, and I-TR-4c: Coordination of Loading Activities, located on p. IV.B-43 of the Draft EIR, would limit hours of

retail and residential operation of the loading spaces to off-peak hours and would require the scheduling and coordination of loading activities with the building management.

Comment TR-7 – Effectiveness of Traffic Mitigation

"Page 32 of the pdf: The proposed mitigation M-C-TR-1 does not deal with traffic. Exactions for BRT infrastructure does not mitigate traffic impact of the project, and should not pretend to do so." (*Paul Wermer*) **[B.12.6]**

"Page 32 of the pdf: The proposed mitigation M-C-TR-1 does not deal with traffic. Exactions for BRT infrastructure does not mitigate traffic impact of the project." (*Marlayne Morgan 2*) **[B.15.3]**

Response TR-7

The Van Ness Avenue BRT project will physically improve the intersection of Van Ness Street/Pine Street, and these improvements will fully mitigate the traffic impact of the proposed project at the intersection under 2035 cumulative conditions. Implementation of Mitigation Measure M-C-TR-1, located on p. IV.B-59 of the Draft EIR, would require the project sponsor to pay the project's fair share of the cost of these physical improvements. Payment of fair share towards improvements is adequate mitigation under CEQA if there is a program in place to collect the funds and build the necessary improvements.

Comment TR-8 – Transit Capacity Data

"Page 129 of the pdf: The quality of the Transit Capacity is questionable. Based on the stated headways and capacities on the 1, 2/3, 38/38L, and 47/49 screenlines, I should only rarely wait for more than 5, 15, 6, and 10 minutes respectively. Similarly, there should be ample capacity for me to board a bus, even at peak periods. The reality is very different. Waits can be much longer, and the buses frequently are too full to accommodate additional passengers. The baseline data analysis and assumptions do not accurately describe the reality, and so mislead the decision makers as to the actual impact on transit." (*Paul Wermer*) **[B.12.8]**

"Page 129 of the pdf: The quality of the Transit Capacity is questionable, especially understating the impact on capacities on the 1, 2/3, 38/38L, and 47/49 once the CPMC Cathedral Hill campus is operational. The baseline data analysis and assumptions do not accurately describe the reality, and so mislead the decision makers as to the actual impact on transit." (*Marlayne Morgan 2*) **[B.15.5]**

Response TR-8

All ridership information was obtained via the SFMTA's most recent ridership data collection efforts, which occurred between August and October 2011. The transit capacity analysis presented in the 1634–1690 Pine Street TIS utilized this ridership data to evaluate transit operations. SFMTA periodically tabulates ridership data to improve service planning. As a result, the baseline data analysis and assumptions used in the TIS are considered valid. The projected transit ridership and capacity for the aforementioned lines after the CPMC Cathedral Hill campus is operational has been considered and analyzed in the Year 2035 Cumulative Conditions Local Transit Screenlines analysis, contained in Section 4.3.4 Transit Impacts of the TIS report and summarized on pp. IV.B-59 to IV.B-64 of the Draft EIR.

Comment TR-9 – Weekend Transit Demand along Van Ness Avenue

"MC – CTR1 only proposes to mitigate the project's impacts by making a contribution to the BRT improvement on the Van Ness/Pine intersection, when the project's impacts will clearly extend to a far greater area. CTR2 claims that the project would not contribute considerably to increase in transit ridership, but the DEIR only ponders increases during weekday rush hours. Riders of Van Ness MUNI lines know very well that these lines are often at their most crowded on weekends and off-hours when bus frequency drops significantly. Weekend functions on the northern waterfront result in heavy use of these MUNI lines by visitors seeking car-free access to the north up from BART and Market Street." (*I.L. Girshman*) **[B.14.9]**

Response TR-9

The levels of service were analyzed at nine study intersections where the project could potentially impact operations of transportation facilities. A significant impact of the project was identified at one intersection (Van Ness Avenue/Pine Street) under Existing plus Project Conditions and no significant project impacts were identified under 2035 Cumulative Conditions.

The MTA does not actively compile weekend and off-hours transit capacities. As a result, the City is unable to verify the commenter's claim that transit lines along Van Ness Avenue are crowded during weekend and off-hours periods.

The Transportation Impact Study was conducted according to *San Francisco Transportation Impact Analysis Guidelines*, which do not require weekend peak hour analysis for residential uses as this type of development has consistently demonstrated peaking during the weekday AM and PM peak hours. Furthermore, a weekend analysis is not necessary because the contribution of the

project's share of trips is not going to be sufficiently intense to warrant a weekend study scenario. Additionally, the proposed project will be required to pay City-mandated Transit Impact Development Fees, which would cover all transit-related impacts during peak-hour and off-hours times, including weekends.

Comment TR-10 – Impacts to Nearby Intersections

"TR-l only mentions the project's traffic impacts on the intersection of Van Ness and Pine Streets, when this intersection contributes to congestion down an extended stretch of the downtown exit corridor with hours of weekday evening bumper-to-bumper traffic. 248 vehicles using the proposed garage daily and moving through the intersection of Pine and Van Ness will congest many other nearby intersections." (*I.L. Girshman*) **[B.14.3]**

Response TR-10

Impact TR-1, starting on p. IV.B-34 of the Draft EIR, considers the potential of the proposed project to adversely affect the level of service at all intersections in the project vicinity, not just at Van Ness Avenue and Pine Street. That intersection is identified in the summary impact statement on p. IV.B-24 of the Draft EIR because it is the only intersection where project traffic would degrade the intersection to an unacceptable LOS during the AM peak hour and add traffic to an intersection that is already operating at an unacceptable LOS during the PM peak hour, thus representing a significant impact.

As discussed on p. IV.B-34 of the Draft EIR under Impact TR-1, the level of service was analyzed at nine study intersections, which represent locations where the project could potentially impact operations of transportation facilities. Four study intersections along Van Ness Avenue were analyzed for the weekday AM and PM peak hours:

1. Van Ness Avenue/Sacramento Street;
2. Van Ness Avenue/California Street;
3. Van Ness Avenue/Pine Street; and
4. Van Ness Avenue/Bush Street.

With the exception of Van Ness Avenue/Pine Street, these intersections operate at acceptable levels of service (LOS D or better) during the weekday AM and PM peak hours under Existing Conditions and would continue to operate at acceptable levels of service under Existing plus Project Conditions and 2035 Cumulative Conditions.

While the vehicular traffic from the proposed project is expected to travel through multiple intersections along the Van Ness Avenue corridor, including those further away from the project site, such as Van Ness Avenue/Sutter Street and Van Ness Avenue/Post Street, project-generated vehicular trips would disperse to be less concentrated the farther the intersection is from the project site. As such, traffic from the proposed project is far less likely to result in a significant impact at these more distant intersections. To result in a significant impact at these intersections, the project would need to increase the traffic volumes for a congested movement by 5 percent. Since the traffic on Van Ness Avenue is "bumper-to-bumper," both the northbound and southbound movements are heavily traveled; it is for this very reason that the proposed project's contributions to these movements are nowhere near 5 percent. As a specific example, the only intersection that would experience a significant traffic impact is at the Van Ness Avenue/Pine Street intersection – an intersection that is in close proximity to the project site. In addition, according to the traffic study completed for the CPMC Long Range Development Plan,[4] none of the aforementioned intersections would experience significant traffic impacts from the traffic added by the implementation of the CPMC Long Range Development Plan. Given that the daily and peak hour traffic added by the proposed project is much lower than that associated with the CPMC project; it is not likely the proposed project would result in significant impacts at these locations.

Comment TR-11 –Traffic Congestion from Cumulative Development

"The DEIR does not mention potential impacts of the Van Ness Avenue BRT project, but rather only assumes that this highly-criticized project will lessen traffic on Van Ness. Since the BRT project reduces capacity by up to 33 percent in certain areas, its effect on congestion conditions could easily be just the opposite. Increased traffic on Franklin and Gough Streets from the shift of traffic from Van Ness, preventing Pine Street traffic from accessing these north-south routes, contributes to the greater traffic congestion menace on Pine Street itself in front of the project and requiring greater mitigation there. The DEIR does not include in its data impacts from the l3 story residential tower proposed for 1545 Pine Street and the CPMC project at Van Ness and Post. The DEIR does not indicate whether the methodology used for determining 2035 cumulative impacts considered any impacts from a 20 year "infill growth and development" program for the surrounding area with other projects comparable in size and scale to the current proposed project." (*I.L. Girshman*) **[B.14.4]**

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4 Fehr & Peers Transportation Consultants, *California Pacific Medical Center Long Range Development Plan – Cathedral Hill Campus*, prepared for the City and County of San Francisco Planning Department, Environmental Planning Division, April 5, 2013. This report is available for review in File No. 2005.0555E at the Planning Department, 1650 Mission Street, 4th Floor.

Response TR-11

See **Response TR-4**, above, on p. RTC.III-20 for a discussion of changes in driver behavior under 2035 cumulative traffic conditions.

As stated on page IV.B-53 of the Draft EIR, the cumulative impact analysis evaluates conditions in the year 2035, including planned and proposed future development growth and transportation network changes in the study area, as well as background growth in travel demand in the City and region.

Background growth in travel demand within the study area consists of both general growth in the City and County of San Francisco and the greater Bay Area region, as well as growth from all major developments in the vicinity of the proposed project, including:

- CPMC Long Range Development Plan (it should be noted that these proposed developments within the CPMC Campus have decreased in size/intensity since this analysis was conducted, and assumed the larger/more intensive land uses associated with this project);
- 1800 Van Ness Avenue Residential Project;
- 1333 Gough Street/1481 Post Street Residential Project;
- 1545 Pine Street Residential Project; and
- 1450 Franklin Street Residential-Commercial Project.

Comment TR-12 – Hazardous Traffic Conditions

"Traffic and pedestrian hazards are created by the project's large bulk and the plan to fully "build-out", the corner of Pine and Franklin. The resulting dark minimally sized sidewalk at the foot of a 130 foot tall wall impacts sightlines for both Pine Street and Franklin Street motorists and pedestrians traversing the intersection. This condition is not identified nor illustrated in the DEIR and no mitigation measures are proposed." (*I.L. Girshman*) **[B.14.5]**

Response TR-12

At the present time, four curb cuts are located along the project frontages on Franklin and Pine Streets, thus resulting in dips in the sidewalks adjacent to the project site. The proposed project would improve pedestrian conditions by eliminating three of four existing curb cuts and thus resulting in an even sidewalk surface along the project frontages on Franklin and Pine Streets. Sightlines and lighting at the intersection of Pine and Franklin Streets are currently adequate and

sightlines and lighting at this intersection would remain adequate as the proposed project would only affect the project site and not the surrounding street.

Comment TR-13 – Private Shuttle Buses

"TR-3 and 4 ignore completely the potential impact resulting from the use of private luxury shuttle buses (aka "Googlebuses") along Van Ness Avenue which already cause heavy impacts by using the corner of Van Ness and Pine as a stop. Impacts for up to 20% of the residents and owners in the project utilizing private shuttle buses should be considered. This could result in an additional shuttle bus using Van Ness and stopping on Van Ness every 10-12 minutes. (Private shuttle buses frequently have reduced capacities as every other row of seats is taken out so tech commuters may have room to conference with each other, stretch their legs, or accommodate their pets.) TR-4 also ignores the impact of these shuttle bus riders waiting in large groups on the sidewalk and interfering with pedestrian accessibility throughout the area." (*I.L. Girshman*) **[B.14.6]**

Response TR-13

Private shuttle buses operate along Van Ness Avenue, a City and County of San Francisco designated Transit Preferential Street, and utilize existing bus stops/shelters. Private shuttle buses were considered as part of the background traffic under Existing Conditions and 2035 Cumulative Conditions. Impacts related to transit (public) are addressed in Section IV.B, Transportation and Circulation, located on pp. IV.B-59 to IV.B-64 of the Draft EIR. It would be speculative to assume that project implementation would lead to an increase in private shuttle bus operations on Van Ness Avenue. No data are available that can be used to project what fraction of the future residents of the proposed project would use private shuttle buses, and the commenter has not provided any evidence to support this assertion. Also please note that the SFMTA proposes to institute a private shuttle fee program.

Comment TR-14 – Vehicle Congestion due to Loading Operations

"Having no off-street loading is going to be a problem, because it's on Pine Street. And the minute something blocks traffic, it's a mess. You get the weaving in and out of traffic and you get honking." (*Patricia Lovelock*) **[TR.3.4]**

"It seems that there will be no pull-in for delivery vehicles (moving trucks, Fed Ex, etc.), which will be parked so that they will block off the right lane of Pine Street, causing traffic congestion on a busy street." (*Hella Cheitlin*) **[B.6.1]**

"Since there will be no place for people to park while waiting to pick up residents, cars will have to be driving around the block, which will put extra traffic on Franklin, California and Van Ness." (*Hella Cheitlin*) **[B.6.3]**

"Regarding traffic impacts along Pine Street: The DEIR should explain why the development lacks an on-site driveway or porte-cochere for serving passenger, freight, furniture moving, garbage pickup and the project's retail businesses. Regarding curbside alternatives, to what extent would traffic be backed-up? How many times must cars be forced to circle the block in the event of a backup? Can rush-hour traffic impacts be forecast? At rush-hour might the developer have to restrict use of curb space parking in order to expedite traffic?" (*Gerald D. Adams*) **[B.8.3]**

Response TR-14

As discussed on p. IV.B-46 of the Draft EIR under Impact TR-6, the combination of the project's commercial loading demand of less than one space during the average and peak hours and the fact that the majority of loading activity would occur during off-peak hours make it unlikely that substantial conflicts would occur as a result of loading activities on Pine Street. Therefore, the impact due to loading operations is considered less than significant. As discussed on p. II-20 of the Draft EIR, the project sponsor would request two on-street commercial loading zones and two on-street passenger-loading zones along Pine Street to meet the project's loading requirements. Improvement Measure I-TR-4b: Limited Loading Hours, located on p. IV.B-43 of the Draft EIR, recommends that deliveries be restricted during peak traffic hours and that all commercial deliveries occur in the yellow loading zone. In addition, the loading zone would be located outside of the travel way and thus would not adversely affect traffic traveling along Pine Street during the AM and PM peak hours. A driveway or porte-cochere is not proposed and thus is not required to be analyzed.

Comment TR-15 – Enforcement of Loading Rules/Additional Deliveries

"Page 29 of the pdf: TR-2 ignores the problem of transient back-ups at peak traffic periods - 3 minutes is a long period in commute traffic. The code definition does not reflect actual impact on dangerous traffic conditions/behaviors. Additionally, this fails to address the issue of space for passenger pick-up and drop-off. On-street passenger loading zones (white curbs) are nice in concept, but in fact rarely work in practice. While we may have laws regarding these common traffic issues, they are so rarely enforced as to be worthless at modifying problem behaviors, and hiding behind a facile "we don't need to do anything, because it is already prohibited" ignores the fact that, in spite of violating various codes, bad traffic

behaviors are common – unless alternative actions, such as off-street drop-offs, are promoted." (*Paul Wermer*) **[B.12.5]**

"Similarly, TR-6 understates the potential use of the loading facilities in the project, ignoring the possibility that the purchasers of the project's market rate condos will utilize delivery services at a greater rate than existing average. Owing to the nature of their jobs, commute distance, and subsequent lack of personal time to shop and retrieve their own goods, condo owners may prefer instead to have goods delivered via trucks which will use and obstruct the limited loading zones for the project at higher than historically observed levels." (*I.L. Girshman*) **[B.14.7]**

Response TR-15

As discussed on p. II-20 of the Draft EIR, the project sponsor would request two on-street commercial loading zones and two on-street passenger loading zones along Pine Street to meet the project's loading requirements. These loading zones would be located in the parking lane (outside of the travel way) on the north side of Pine Street, which is not subject to peak-hour tow-away restrictions. Based on information and rates included in the *San Francisco Transportation Impact Analysis Guidelines*, the project would generate approximately 10.6 delivery/service vehicle trips per day, which would result in a demand for less than one loading space during the average and peak hours of activity. It is speculative to assume that the behavior of the residents who will reside in the proposed project would deviate from the information and rates included in the *San Francisco Transportation Impact Analysis Guidelines*. Therefore, the information and rates used to estimate the number of delivery/service vehicle trips per day generated by the proposed project are adequate.

Concerning loading operations and their effect on traffic, it is anticipated that the residents would utilize the proposed on-street passenger loading spaces for move-in and move-out activities. If necessary, residents would be able to utilize any available on-street parking space or reserve curb parking through the SFMTA and the San Francisco Police Department (SFPD). Typically, residential move-in and move-out activities occur during off-peak times and substantial conflicts with traffic and other modes of travel would not be anticipated. However, to further reduce this less than significant impact, Improvement Measure I-TR-4b: Limited Loading Hours, and I-TR-4c: Coordination of Loading Activities, both located on p. IV.B-43 of the Draft EIR, would limit hours of retail and residential operation of the loading spaces to off-peak hours and would require the scheduling and coordination of loading activities with building management. As such, the

proposed loading and drop-off zone would not result in congestion or obstruction and would not be expected to contribute to driver frustration nor increase high-risk driving actions.

Comment TR-16 – Pedestrian Safety during Construction

"I'd like to add two areas that I'm interested in seeing examined further in the final EIR. One is about pedestrian safety especially during construction. This is a very dense area. Construction is very difficult, obviously, around a lot of existing structures and I think especially during construction we've been seeing difficulties for pedestrians." (*Planning Commissioner Wu*) **[TR.8.1]**

Response TR-16

As discussed under Impact TR-9 located on pp. IV.B-51 to IV.B-53 of the Draft EIR, sidewalks would remain open during construction. If sidewalks required closure, the project sponsor would follow the procedures for sidewalk closure contained in the Regulations for Working in San Francisco Streets prepared by SFMTA. These regulations require the contractor to provide a 4-foot-wide clear path of travel on any sidewalk at all times and to post signs. The construction contractor(s) would also be required to comply with all other City requirements with respect to pedestrian safety during construction, including the use of flaggers, traffic control, signage, and a canopied walkway as appropriate.

Comment TR-17 – Pedestrian Access for the Physically Disabled during Construction

"Please be advised that pedestrian access through the construction zone of this project must be in accordance with Americans with Disabilities Act (ADA) guidelines." (*Erik Alm*) **[A.2.2]**

Response TR-17

Pedestrian access along Pine Street and Franklin Street during project construction would be provided in accordance with ADA guidelines, which require that all pedestrian routes around and/or through a construction zone be wheelchair accessible.

Comment TR-18 – Pedestrian Safety for the Neighborhood's Elderly Residents

"I appreciate your mentioning the word "pedestrian safety." I do believe that the increase of people exiting onto Pine Street in that block will further accentuate the urban thoroughfare notion of having two one-way pairs taking traffic out of San Francisco and bringing it back downtown, that being Bush and Pine. Those are two very dangerous streets. One of the commenters commented on the accident which happened a few weeks ago."

"But what I am mostly concerned about, driving in that corridor frequently, is that the entire population of the assisted-care home for the elderly on Pine street really still tries to walk to Van Ness and to Whole Foods at the corner of Franklin and California. And they're encouraged to do so because it's a slight uphill exercise for them. And you often find yourself having to move slowly as they move across the intersection. And I believe that the increase in traffic or traffic mitigation which address that needs to be a serious responsibility of this EIR to address." (*Planning Commissioner Moore*) **[TR.7.5]**

Response TR-18

The proposed project would not make any physical changes to the crosswalks nor alter their operation (e.g., the amount of time allotted to cross the street) adjacent to or near the project site. The time allotted to cross the street at an intersection is determined by the City and will continue to be monitored and appropriately adjusted by the City to address the specific needs of the population using the area crosswalks. Similar to all other drivers, drivers traveling to and from the project site would be required to stop for pedestrians using the adjacent or nearby crosswalks. As a result, vehicle traffic from the proposed project would not pose a hazard to pedestrians utilizing adjacent or nearby crosswalks.

Comment TR-19 – Vehicles Queues Disrupting Pedestrian Travel on Adjacent Sidewalks

"There may be backups of cars trying to get into the parking garage, which means that cars waiting enter will block the sidewalk, making it dangerous for pedestrians, as well as protruding out into Pine Street, blocking traffic." (*Hella Cheitlin*) **[B.6.4]**

Response TR-19

Impacts on pedestrians from vehicles queuing to enter the parking garage are addressed in Section IV.B, Transportation and Circulation, located on pp. IV.B-42 to IV.B-43 of the Draft EIR. Improvement Measure I-TR-2: Abatement of Parking Queue, located on pp. IV.B-36 to IV.B-37 of the Draft EIR, would minimize the potential for vehicle parking queues to extend out onto the sidewalk and Improvement Measure I-TR-4a: Audible and Visual Warning Devices, located on p. IV.B-43 of the Draft EIR, would require the installation of audible and visual warning devices to alert pedestrians of vehicles exiting the project garage. Finally, the project's loading zones would not introduce any new potential points of conflict between vehicles and pedestrians, and implementation of Improvement Measures I-TR-4b: Loading Hours, and I-TR-4c: Schedule and Coordination, located on p. IV.B-43 of the Draft EIR, would further minimize the potential for conflicts during loading.

Comment TR-20 – Effects of One-to-One Parking

"I had a question for staff. Reading the analysis of the parking, looks like we're only analyzing 245 parking places and we're going to have 262 units. So is -- isn't there a one-to-one requirement in this neighborhood for parking?" (*Planning Commissioner Antonini*) **[TR.4.1]**

"And I think if there is, then obviously we'd have to analyze the effects based upon having one-to-one parking." (*Planning Commissioner Antonini*) **[TR.4.2]**

"If the Code dictates there be one-to-one parking -- I mean they can ask for less, obviously. The project sponsor can ask for less. But then one would assume that you would analyze what would be the Code-compliant alternative and not a lesser alternative." (*Planning Commissioner Antonini*) **[TR.4.3]**

Response TR-20

The project sponsor is requesting a Planned Unit Development (PUD) approval, and the City code allows a PUD permit to modify the off-street parking requirement and provide parking at a rate that is different from that required by the Planning Code. Furthermore, as discussed on pp. IV.B-47 to IV.B-49 of the Draft EIR, implementation of the proposed project would not result in a significant impact with regard to parking. Therefore, the evaluation of an alternative that provides one-to-one parking is not required.

Comment TR-21 – Parking Supply

"The Sierra Club believes the project proposed for 1634–1690 Pine Street, near Van Ness Avenue, has an excessive amount of parking. Project sponsors propose a 130-foot residential building with 262 residential units, 245 parking spaces, and 91 bicycle parking spaces. While the 245 parking spaces amount to less than one parking space per unit, the SC believes it is still too much." (*Susan Vaughn*) **[B.5.1]**

Response TR-21

The commenter's opposition to the proposed amount of parking is noted. As documented in Section IV.B, Transportation and Circulation, located on pp. IV.B-31 to IV.B-34 of the Draft EIR, projected parking demand is 275 spaces for the weekday midday, and 341 spaces for the weekday evening, which indicate that the proposed number of parking spaces for the proposed project is roughly commensurate with the project parking demand for the proposed land uses.

Comment TR-22 – Loss of Existing Parking Spaces

"TR-8 does not ponder the loss of parking now present in the so-called "vacant lot" which is used by the Church at Franklin and California for their Wednesday evening and Sunday morning services. The DEIR identifies a daily shortfall of 30 spaces for the entire project but claims this shortfall would be remedied by using nearby spaces, despite identifying current parking use in the surrounding area at steady 90 to 100% occupancy levels. The project itself would forever remove 4 parking spaces now available to be used by the general public. No mitigation is proposed for that effect." (*I.L. Girshman*) **[B.14.8]**

Response TR-22

Please refer to revisions to the Draft EIR on p. RTC.IV-6, which notes that SB 743 eliminated the need for analysis of parking impacts for certain urban infill projects. The parking discussion and the following response are provided for informational purposes only.

As indicated on Section IV.B, Transportation and Circulation, located on p. IV.B-20 of the Draft EIR, on-street parking occupancy levels of 85 to 100 percent are only found on Franklin Street, between California Street and Pine Street during the weekday midday peak period. On-street occupancy levels of 40 and 60 percent during the weekday midday peak period are found on Pine Street, between Franklin Street and Van Ness Avenue, and Van Ness Avenue, between California Street and Pine Street, respectively. During the weekday evening peak period the off-street parking utilization in the block adjacent to the project site was observed at 90 percent. Concerning off-street parking, there are a total of 285 public off-street parking spaces within the parking study area, with 17 spaces located on the project site and 268 spaces located off-site. Overall, average occupancy is approximately 85 percent during the weekday midday peak period and 73 percent during the weekday evening peak period. Given the occupancy rates in the area for on- and off-street parking for the weekday midday and evening peak periods, existing on- and off-street parking supply would be sufficient to meet the daily demand of 30 spaces associated with the proposed project and absorb the demand resulting from the displacement of 17 parking spaces on the vacant lot and four parking spaces along Pine Street that would occur under the proposed project.

E. WIND

Comment WS-1 – Increase in Dangerous Wind Conditions

"Also the corner of Pine and Van Ness and on Franklin at the Pine St. corner are wind tunnels now. They said studies had been done on the impact of a 13 story building on Pine St. and there would be no

problem with wind due to the new building. Frankly I don't believe it. We have people living here at 1661 Pine St. (the SF Towers - a retirement community) who have difficulty staying upright with the wind problem now, and it's going to affect their quality of life if they can no longer walk in this area." (*Joyce W. Finlay*) **[B.2.3]**

"The high rise will produce gusts of wind which are a danger to people with canes and walkers or elderly pedestrians walking on the sidewalk." (*Hella Cheitlin*) **[B.6.5]**

"As to wind, past city experience recalls that high buildings tend to deflect winds downward onto pedestrians unless the building's architecture buffers and deflects the winds upward. Is that the case regarding the Franklin Street sidewalk outside 1634 Pine Street? The DEIRs language should explain in non-technical language how wind effects there fail to constitute a problem." (*Gerald D. Adams*) **[B.8.2]**

Response WS-1

As discussed in Section IV.C, Wind, located on p. IV.C-3 of the Draft EIR, existing wind conditions in the general vicinity of the project site are moderate to windy. Under existing conditions, the average equivalent wind speed at 18 test locations adjacent to or near the project site is approximately 11.2 miles per hour (mph), with wind speeds ranging from 9 to 16 mph 10 percent of the time. Wind speeds 90 percent of the time are lower. The highest wind speed (16 mph) occurs at the corner of Pine Street and Van Ness Avenue. Wind speeds in front of the project site range from 9 to 12 mph 10 percent of the time along Pine Street and are 9 mph 10 percent of the time along Franklin Street.

As stated in Section IV.C, Wind, located on p. IV.C-3 of the Draft EIR, the City and County of San Francisco enacted Planning Code Section 148 and equivalent Code sections in order to provide a safe and comfortable wind environment for people in San Francisco. Section 148 identifies wind comfort and wind hazard criteria for use in evaluating a proposed building's effect on pedestrian-level wind conditions. The wind comfort and wind hazard criteria of Section 148 were used to analyze wind impacts of the proposed project.

The wind hazard criterion speed contained in the Code was based partly on studies that determined how strong winds from high-rise buildings actually affect pedestrians, with the objective to prevent new buildings from producing winds that would cause severe stability problems for people or could blow people over. Clearly, "people with canes and walkers or

elderly pedestrians" as well as anyone with balance problems, regardless of age, would be more susceptible to strong winds than would typical San Francisco pedestrians.

Wind speeds in front of 1661 Pine Street (the SF Towers) currently range from 11 to 16 mph 10 percent of the time. With the proposed project in place, the winds along these sidewalks would be the same with wind speeds ranging from 11 to 16 mph 10 percent of the time. Further, the wind speeds along the SF Towers frontage along Pine Street measured in the project wind test, both under the existing setting and with the project, are well below the hazard criterion speed.

Wind speeds on sidewalks nearest the project site, along Franklin Street between Pine and California Streets, and along Pine Street between Franklin Street and Van Ness Avenue currently range from 9 to 12 mph 10 percent of the time. However, with implementation of the proposed project, wind speeds along the frontages of the project site would slightly increase with speeds ranging from 10 to 15 mph 10 percent of the time. However, despite the slight increase, the wind speeds on sidewalks nearest the project site, along Franklin Street between Pine and California Streets, and along Pine Street between Franklin Street and Van Ness Avenue measured in the project wind test, are well below the hazard criterion speed. See also **Response W-2**, below.

Comment WS-2 – Wind Impacts Not Studied at Locations near the Project Site

"One of the DEIR's greatest shortcomings is its failure to recognize potential wind impacts of the project. Wind studies were not performed at many of the most likely heavily affected locations near the project. Two 130 foot walls built directly in the face of the wind when it comes sweeping in with a typical pattern would channel and bounce that wind over a wide area. No wind studies were done mid-block on pedestrian heavy California Street between Van Ness and Franklin, no wind studies done on either northwest or southwest California/Van Ness intersections or at the cable car terminus there which is frequently used by large tourist groups, none in mid-block Van Ness between California and Pine, none on either northeast or southeast corners at Pine and Van Ness." (*I.L. Girshman*) **[B.14.10]**

Response WS-2

Several Planning Code Section 148 protocol wind tests have been performed for projects proposed at the 1634–1690 Pine Street site and the vicinity in the past. Those tests each measured existing and project wind speeds at up to 30 test points sited along Franklin Street and along Van Ness Avenue, from California to Bush Streets, and on California, Pine, and Bush Streets from Franklin Street to Van Ness Avenue. These prior wind tests, with excellent agreement of test results among the tests, conclusively show that the substantive wind effects of the current project,

which is smaller than the prior designs tested, would occur only within the area surrounded by the test points selected for the current project. In every pedestrian wind effects test, the practice is to select the measurement points most likely to have highest wind speeds and/or the most turbulence; these points typically occur at the corner of a block and/or at the corners of a high-rise tower. Test points are also placed at building entrances, and enough additional points are spaced along a street frontage to be able to obtain the trend of wind speeds mid-block. Given that wind flow around buildings is a well-known phenomenon, it is not necessary to measure at every place along the sidewalks in order to assess the wind conditions on the block accurately, especially when the intent of Section 148 is to find the points with highest wind speeds.

In addition, a recent wind test was reported in the Draft EIR for a project under environmental evaluation at 1527–1545 Pine Street on the south side of Pine Street one block east of the project site.[5] Of the 54 points measured for the 1527–1545 Pine Street project wind test, only three points on Van Ness Avenue duplicate test points for the 1634–1690 Pine Street project. At those three points, the 1527–1545 Pine Street test reported 10 percent exceeded wind speeds 3 to 7 mph higher than speeds reported in the 1634–1690 Pine Street Project test, but found no wind hazard at those three points under the existing conditions for that project or for that project plus cumulative cases, which included the proposed project. That wind test did find four wind hazards – two on the east side of Van Ness Avenue at its intersection with Pine Street and one on each side of Pine Street near the base of the 25-story tower at 1500 Van Ness Avenue. The durations of the existing hazards would be reduced by the 1527–1545 Pine Street project, as well as under the Project Plus Cumulative scenario.

Comment WS-3 – Wind Study Methodology

"Wind speed and flows vary greatly in the area, and are at their greatest in summer months in the afternoon. The DEIR does not identify what time of year or day the studies modeled. The methodology of the wind studies is barely explained, except to indicate that a model of the project, presumably measuring 3 inches in height and 4 inches in length, was built for wind tunnel tests performed in Davis. Did the model also include a topographical model of the surrounding area, including the peak found at Lafayette Park, and the large wind-channeling buildings already extant nearby? How can such a tiny model identify wind impacts at street corner levels, where pedestrians would take the brunt of 30 mph gusts creating uncomfortable and hazardous conditions? The EIR needs to have credible evidence regarding this impact."

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5 Rowan Williams Davies & Irwin, Inc. (RWDI), *1545 Pine Street Pedestrian Wind Study,* prepared for San Francisco Planning Department, October 8, 2013. This document is available for review in File No. 2006.0383E at the Planning Department, 1650 Mission Street, Suite 400.

"The DEIR does not treat wind impacts seriously. A much greater effort needs to be done to protect pedestrians from serious and hazardous wind impacts which may be caused by the project. These are the kinds of impacts which clearly were NOT considered when both the Holiday Inn building and the massive San Francisco Towers buildings were approved." (*I.L. Girshman*) **[B.14.11]**

Response WS-3

The details of the wind test and analysis of the proposed project are reported in a wind technical memorandum[6] prepared for the proposed project. The following discusses the testing method and adds more information about the scale models.

An Atmospheric Boundary Layer wind tunnel was used to simulate the wind effects of the project as well as the existing conditions. That wind tunnel allows testing of natural atmospheric boundary layer flow past surface objects such as buildings and other structures. Essential to the value of wind tunnel testing is the fact that the physics of fluid flow make it possible to properly simulate the winds around full-size buildings by the use of much smaller, accurate models of the project and vicinity. The Atmospheric Boundary Layer wind tunnel has an overall length of 72 feet, and a test section 4 feet wide by 6 feet high. The test section has a usable length of up to approximately 8 feet. Using a 1-inch to 50-foot scale model of the project site and vicinity enables the wind tunnel to test a model that is up to approximately 2,200 scale feet wide by up to 4,400 scale feet long. The scale model of each city block includes the surface topography and all of the buildings. Including topography ensures that the wind flows that are affected by the hills will be properly simulated. Although usually not included in a model, when present, street trees slow the wind; for that reason, not including street trees is conservative – it results in the highest possible measured wind speeds on sidewalks.

Wind-tunnel tests were conducted for two alternate configurations: the Existing Setting and the Project in the Existing Setting. Both configurations were tested for each of three major wind directions: northwest (NW), west-northwest (WNW), and west (W). The test procedure consisted of orienting the selected configuration of the model in the atmospheric boundary layer wind tunnel along the desired wind direction and measuring wind speed at each test location.

For example, when the model was set up in the wind tunnel for the West wind test, the model width (cross-wind) included the six city blocks from Post Street to Clay Street, while the length,

6 Environmental Science Associates, *Technical Memorandum for Potential Section 148 Wind Impacts, Proposed 1634 Pine Street Development, San Francisco, California*, prepared for San Francisco Planning Department, December 6, 2012. A copy of the report is available for review in File No. 2011.1306E at the Planning Department, 1650 Mission Street, Suite 400.

along the direction of the West wind, included eight city blocks from Laguna Street to Leavenworth Street. Thus, the top of the nearby hill at Lafayette Park is included in the test model, and the difference in elevation from highest point to lowest on the model is about 250 scale feet. With this model, winds around the project site are accurately simulated.

Wind-speed measurements at each test location were made with a hot-wire anemometer, an instrument that directly relates rates of heat transfer to wind speed by electronic signals that are proportional to the magnitude and steadiness of the wind. All measurements were taken at the same series of surface points on the model for all test configurations and wind directions. Corresponding measurements were taken in the free-flowing air relatively high above the test model for each test configuration and wind direction. For each test point, a ratio (referred to as an "R-value") was estimated by dividing the wind speed measured near the ground surface by the wind speed measured in the undisturbed air high above that ground surface. Due to this methodology and the basic nature of air, although the wind speed in the tunnel is constant, the R-values (which also can be expressed as the calculated percentage changes in wind speed) apply uniformly to any wind speed of concern at the site, from the lower speeds to the highest. If the speed of the free-stream wind blowing overhead were to vary, the wind speed at the test measurement point would vary in direct proportion. This is true in the wind tunnel test and is also true at the project site.

These measurements provide the mean relative velocity and turbulence values used to calculate the equivalent wind speed. The output data were reduced using a computer program that evaluated the contribution from each tested wind direction to the total and then scales it to the wind speed record as measured at the Old Federal Building located at 50 United Nations Plaza. The output of the computer program is presented in the Wind-Tunnel Test Results tables for normal winds and for hazardous winds. These tables were appended to the wind technical memorandum, with its results informing the conclusions cited in the wind analysis of the Draft EIR.

With regard to "impacts which clearly were NOT considered when both the Holiday Inn building and the massive San Francisco Towers buildings were approved," please see **Response WS-1**, above, on pp. RTC.III-34 to RTC.III-35, which presents the Draft EIR's description of the existing local wind environment in the project vicinity, which is confirmed by both the wind speed measurements in the wind tunnel test reported here for the 1634–1690 Pine Street Project and the wind speed measurements in the wind tunnel test reported in the Draft EIR for the proposed 1527–1545 Pine Street project. See also **Response WS-2**, above, on pp. RTC.III-35 to RTC.III-36.

F. ALTERNATIVES

Comment AL-1 – Amount of Building Preservation that Would Occur under the Preferred Alternative

"I notice all the different alternatives. It's a little unclear as to -- the preferred alternative, I guess, preserves just a small amount of the three historic buildings. And how -- I know it's probably in here, but how deep does that go?" (*Planning Commissioner Antonini*) **[TR.4.4]**

Response AL-1

The proposed project would preserve the front façades of three of the five buildings on the site and demolish the rest of the structures. Chapter VI, Alternatives to the Proposed Project, in the Draft EIR presents an evaluation of alternatives that would preserve all five façades and more of the existing structures on the sites. As indicated in Chapter VI, Alternatives to the Proposed Project, located on p. VI-42 of the Draft EIR, the Full Preservation Alternative was identified as the environmentally superior alternative as it would avoid the *de facto* demolition of the existing structures on the project site, as defined by *San Francisco Planning Code*, Article 10, Section 1005(f) and result in less than significant project-level and cumulative impacts on historical architectural resources. Under the Full Preservation Alternative, the front 38 percent and the back 15 percent on the buildings on the project site would be preserved. Under this alternative, the residential tower would be set back approximately 50 feet from the Pine Street frontage and about 20 feet from the rear; together both the front and rear setbacks would represent half the distance of the lot. A summary of project impacts under each alternative considered in the Draft EIR is provided in Table VI-1, Comparison of Significant Impacts of the Project and Alternatives, located on pp. VI-4 to VI-5.

Comment AL-2 – Difference between the Alternatives Studied in the Draft EIR

"Well, that would be the question I want to know is a little bit more detail on -- it's probably in here -- but the differentiation between the various alternatives -- the full-preservation and the -- I've read parts of it and it does give you some detail. But that's important to know how that's all going to fit together." (*Planning Commissioner Antonini*) **[TR.4.5]**

Response AL-2

A full description of the Partial Preservation Alternative is provided in Chapter VI, Alternatives to the Proposed Project, located on pp. VI-7 to VI-17 of the Draft EIR. As described in Chapter VI, this alternative would involve demolition of the rear portions of the existing five buildings on the

project site, and construction of one building with a 13-story residential tower and a six-story residential element with commercial use on the ground and second floors. All of the existing building façades and the front 20 to 30 feet of the existing buildings would be incorporated into the new building under this alternative. Overall, the Partial Preservation Alternative would preserve the front 15 to 22 percent of the buildings on the project site.

A full description of the Full Preservation Alternative is provided in Chapter VI, Alternatives to the Proposed Project, located on pp. VI-25 to VI-35 of the Draft EIR. As described in Chapter VI, this alternative would involve demolition of portions of the existing five buildings on the project site, and construction of one eight-story residential tower with commercial use on the ground and second floors. All of the existing building façades and substantial portions of the extant buildings (the front 50 feet) would be incorporated into this alternative. Overall, the Full Preservation Alternative would preserve the front 38 percent and the back 15 percent of the buildings on the project site.

Comment AL-3 – Modified Full Preservation Alternative

"While the draft EIR accurately describes the project's impacts on cultural resources, it fails to evaluate a reasonable range of alternatives that would meaningfully reduce impacts on cultural resources and achieve most of the project objectives. In particular, we feel that the planning department should revise the so-called full-preservation alternative to enable it to more closely adhere to project objectives. This alternative could be modified by shifting more density to the vacant lot adjacent to historic buildings. The full-preservation alternative references Van Ness Avenue as a shared context, thereby limiting the height of the proposed residential towers to eight stories and significantly reducing the number of residential units. We believe that the context should be adjusted to more accurately reflect prevailing development patterns in the surrounding neighborhoods, including the 13-story tower directly across from Pine Street. This modification would allow a 13-story (sic) to be built at the corner of Pine and Franklin, increasing the number of units and allowing greater retention of the historic fabric, while enhancing the feasibility of the full-preservation alternative." (*Desiree Smith*) **[TR.2.2]**

"While the DEIR accurately describes the project's impacts, it fails to consider a reasonable range of potentially feasible alternatives that would meaningfully reduce impacts on cultural resources and achieve most of the project objectives. CEQA Guidelines require a range of alternatives to be considered in the EIR, with an emphasis on options capable of "substantially lessening" significant adverse environmental impacts while achieving most of the stated project objectives."

"The DEIR for the 1634-1690 Pine Street Project fails to evaluate a single alternative that would retain the eligibility of the historic district and achieve a majority of project objectives. We urge the Planning Department to craft an alternative that allows for greater preservation of identified historic buildings, while more closely approximating the desired number of units in the project description. For example, the Department should modify the so-called 'Full Preservation Alternative' by shifting more new construction and height onto the vacant lot adjacent to the historic buildings at the corner of Pine and Franklin. In describing the Full Preservation Alternative, the DEIR references Van Ness Avenue as the shared context and thereby limits the height of new residential towers to eight stories. As a result, this alternative falls far short of the desired number of units and is destined to be rejected as infeasible. We feel that the context should be adjusted to more accurately reflect prevailing development patterns in the immediate vicinity, especially the 13-story San Francisco Towers project directly across Pine Street. This would allow a taller, 13-story tower to be built at Pine and Franklin with more units, helping to alleviate pressure on the existing historic buildings and enabling greater retention of cultural resources, while enhancing the feasibility of the Full Preservation Alternative." (*Mike Buhler*) **[B.13.2]**

"Yeah. I would agree with Historic Preservation's Comments on the draft EIR fails to present a meaningful set of alternatives. A meaningful set of alternatives would go beyond façadism but would try residential towers in the back of a mid-block property would fully preserve the entire three buildings that are there." (*Planning Commissioner Moore*) **[TR.7.1]**

Response AL-3

CEQA requires that an EIR provide an evaluation of a reasonable range of alternatives to the proposed project that would avoid or reduce the project's significant impacts while achieving most of the project alternatives.[7] As a result, the lead agency need not discuss every potential alternative to the project. The project's significant and unavoidable impacts are limited to its impacts on historic architectural resources. The alternatives presented in the Draft EIR represent a reasonable range of alternatives in that the Partial and Full Preservation alternatives progressively preserve more of the existing historic structures on the project site while providing some of the mixed-use development desired by the project sponsor.

Adding an alternative that would modify the Full Preservation Alternative by allowing a taller, 13-story tower on the vacant lot as suggested by the commenters would overwhelm the setting of the historic structures on the project site. Planning Preservation staff determined eight stories to

7 *State CEQA Guidelines* Section 15126.6 (f)

be the appropriate height for the Full Preservation Alternative residential tower given the setback required so as not to encroach on the setting of the historic structures.

Comment AL-4 – Formulation of Partial and Full Preservation Alternatives

"Please explain how the Partial and Full Preservation Alternatives were formulated." (*Karl Hasz*) **[A.1.2]**

Response AL-4

As described in **Response AL-3**, above, CEQA requires that an EIR provide an evaluation of a reasonable range of alternatives to the proposed project that would avoid or reduce the project's significant impacts while achieving most of the project alternatives. As a result, the lead agency need not discuss every potential alternative to the project. As described in Chapter VI, Alternatives to the Proposed Project, located on pp. VI-7 to VI-42 of the Draft EIR, the Partial Preservation Alternative would involve demolition of the rear portions of the existing five buildings on the project site, and construction of one building with a 13-story residential tower and a six-story residential element with commercial use on the ground and second floors while the Full Preservation Alternative would involve the demolition of portions of the existing five buildings on the project site, and construction of one eight-story residential tower with commercial use on the ground and second floors.

The Partial Preservation Alternative was developed to reduce the project's impact on the integrity of historical resources and be more in compliance with the *Secretary of the Interior's (SOI) Standards* than the proposed project, while the Full Preservation Alternative was developed to avoid the *de facto* demolition of the existing buildings on the project site, as defined by *San Francisco Planning Code*, Article 10, Section 1005(f). In regards to the Partial Preservation Alternative, the lower height on the main portion of the building (six stories instead of eight stories) was a result of a reduced setback compared to the Full Preservation scheme – i.e., to impose less upon the remaining historical portions. The reduced setback was included to try to increase the residential density by having units oriented perpendicular to the exterior on both the front and back instead of parallel, resulting in a deeper building with more units and more saleable or rentable square footage. One practical matter which influenced the reduced setback design was the requirement that each residential unit provide a certain number of Code-compliant exterior windows. Providing the windows too close to the neighboring property line would result in practical difficulties and increased costs related to Fire and Building Code compliance, and would diminish the desirability of the units. Lastly, it was decided to place 13 stories on the vacant lot since that property has no existing historical buildings and the height

limit allows it. While a 13-story addition to the vacant lot under the Partial Preservation alternative would increase the number of residential units provided by the project, the alternative would not reduce historical resource, transportation, or wind impacts. Ultimately, the resulting design under the Partial Preservation Alternative was a balance between greater density and the impact on the historical resources. As for the height of the residential tower under the Full Preservation Alternative, eight stories was determined to be the appropriate height by Planning Preservation staff given the setback required so as not to encroach on the setting of the historic structures.

Comment AL-5 – Modified Partial Preservation Alternative

"The EIR should have considered a Partial Preservation Alternative with both towers being 13 stories, rather than one being 13 stories and the other being 6 stories. That would better satisfy the project sponsor's desire to develop a project that is financially feasible. Given that the six-story building is set back behind the remaining portions of the existing buildings under the Partial Preservation Alternative, increasing the tower height to 13 stories would not substantially change the feeling of the buildings' historicity conveyed at the street level." (*Karl Hasz*) **[A.1.3]**

"Yeah. I just wanted to associate myself with the comments that I guess that HPC provided related to the partial-preservation alternative, exploring shifting the stories to better preserve the buildings and also kind of further exploration of a real, more genuine full-preservation alternative in terms of the historic structures." (*Planning Commissioner Borden*) **[TR.5.1]**

"The other thing is I think that Historic Preservation Commission's comment on the alternative that says I think that there should be consideration given to increasing the 6-story portion to 13 to better meet the project sponsors programmatic requirements is something that should be looked at." (*Planning Commissioner Sugaya*) **[TR.6.2]**

Response AL-5

While increasing the six-story residential element under the Partial Preservation Alternative to 13 stories would increase the number of dwelling units of the alternative, it would not eliminate the significant and unavoidable impact of the alternative on historical architectural resources because the alternative would still result in the *de facto* demolition of the existing structures on the project site, as defined by *San Francisco Planning Code*, Article 10, Section 1005(f).

Impacts of a modified Partial Preservation Alternative that increase the six-story residential element to 13 stories would be within the range of impacts analyzed in the Draft EIR for the Partial Preservation Alternative and the proposed project. As noted above, the historic architectural resource impacts of this alternative would be the same as that under the Partial Preservation Alternative, while the traffic impacts would be similar to the impacts of the proposed project. If the Planning Commission wished to approve a project with this design, it could rely on the EIR analysis to satisfy CEQA.

Comment AL-6 – Naming of Full Preservation Alternative

"'Full Preservation Alternative' is a bit of a misnomer, given that this alternative would result in a significant impact to historic architectural resources - albeit a reduced impact compared to the proposed project. Please consider a more appropriate title for this alternative." (*Karl Hasz*) **[A.1.4]**

Response AL-6

The alternatives in the Draft EIR were named to reflect the extent to which elements of the existing historic structures would be retained as part of the project. The commenter is correct that the Full Preservation Alternative would not eliminate all project impacts to existing historic architectural resources, as it would remove portions of the existing five buildings at the site. However, the Full Preservation Alternative would retain all five existing building façades and incorporate substantial portions of the extant buildings into the project design, avoiding *de facto* demolition of the structures as defined by San Francisco Planning Code Article 10, Section 1005(f). Accordingly, the Draft EIR finds the Full Preservation Alternative would result in a less than significant impact to historic architectural resources with implementation of Mitigation Measures M-CP-4a, MCP-4c, and M-CP4d. By comparison, the proposed project would demolish two of the contributors to the eligible Pine Street Auto Shops Historic District and would result in the *de facto* demolition of the remaining three contributors, while the Partial Preservation Alternative would retain all of the existing building façades but would result in the *de facto* demolition of each building. Both the proposed project and Partial Preservation Alternative would result in significant and unavoidable impacts to historic architectural resources that could not be lessened through implementation of mitigation measures. Therefore, the Full Preservation Alternative was named to reflect its lesser impact to historic resources as compared to the proposed project and the Partial Preservation Alternative. For purposes of consistency with the Draft EIR, this alternative has not been renamed in the responses to comments.

Comment AL-7 – Support for the Full Preservation Alternative

"Consistent with our long standing concern with the scale of this proposed project, we find the new project sponsor is attempting to crowd too many units onto too small a site, rather than designing a building which blends into the surrounding blocks and allows space for light and air to permeate onto Pine Street. Therefore, the Cathedral Hill Neighbors Association is urging the Commission to support Alternative C, the Full Preservation Alternative."

"In addition to an attractive concept of varying heights and setbacks for new and preserved structures on this site, Alternative C will provide 100 new residential units and 40 parking places, would meet all of the project sponsor's goals and establish a desirable new project in the neighborhood."

"We urge you to support Alternative C." (*Marlayne Morgan 1*) **[B.11.2]**

Response AL-7

This comment, which expresses support for the Full Preservation Alternative, would provide 155 new residential units and 159 parking spaces, is noted. This comment does not raise any specific issue about the feasibility of the alternative to reduce significant project impacts.

Comment AL-8 – Effects of the Alternatives on Surrounding Land Uses

"The alternative analysis fails in that the entire alternatives-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon." (*Nick R. Green*) **[B.16.4]**

Response AL-8

CEQA requires that an EIR include an evaluation of a reasonable range of alternatives to the proposed project that would avoid or reduce the project's significant impacts while achieving most of the project alternatives. The alternatives analysis presented in the Draft EIR on pp. VI-7 to VI-42 therefore focuses on only those impacts of the proposed project that were determined to be significant or potentially significant. Section 1, Land Use and Land Use Planning, in the Initial Study (see Appendix A of the Draft EIR) provides a discussion of the project's effects on surrounding land uses. As discussed in Section 1, although the project site would be converted from commercial and industrial uses to mostly residential with some commercial uses, this change in land use would not be substantially or demonstrably incompatible with existing

commercial and high-density residential uses in the project area, and therefore would result in a less than significant impact. Thus the Draft EIR is not required to evaluate land use alternatives. A discussion of project's growth-inducing impacts is provided in Chapter IV, Other CEQA Issues, located on pp. V-1 to V-2 of the Draft EIR.

G. GENERAL COMMENTS

Comments GC-1 – Comments in Opposition to the Proposed Project

"Thank you. My name is Michael Disend; and I live at 1777 Pine Street, within a block of the project; and I have lived there since 1996. And I just want to reiterate what other people have said, that this is a neighborhood. And everybody that I've spoken to is unanimously and very, very strongly against this project." (*Michael Disend*) **[TR.1.1]**

"I'm not going -- this sentiment is the reason why B and C were defeated. They were defeated because we love this city. We grew up and we care about it. We don't want to turn it into a place for the ultra-rich. This is not Hong Kong, full of towers. It's San Francisco, full of beauty and soul and heart. So I personally and everybody in my building that I've talked to stands adamantly against this project. And at the very least you can do is cut it down and make it smaller." (*Michael Disend*) **[TR.1.4]**

"I live two blocks from the project and walk by everyday on the way to work. This project would be very beneficial for the neighborhood. Right now it's homeless people and unsafe to walk by at night. It would make Van Ness Street more interesting and vibrant (possibly a BVLD. with cafes and restaurants, shops and a lot of foot traffic). (I walk a half hour to work each way a day)." (*Dan Bane*) **[B.3.1]**

"Also the residential towers would complement the senior residence home across the street." (*Dan Bane*) **[B.3.3]**

"THIRTEEN STORIES?!! Two towers!? The time required for the demolition and construction will only cause huge misery. This isn't "construction". It's DESTRUCTION of neighborhood residents, neighborhood history, and our lives. It's an assault on our peace, our quiet, our right to live in someplace quiet and peaceful, not a crazy zoo of construction sites in every direction." (*Michael Disend 1*)**[B.9.2]**

"THIRTEEN STORIES?!! Two towers!? The time required for the demolition and construction will only cause huge misery. This isn't "construction". It's DESTRUCTION of neighborhood residents, neighborhood history, and our lives. It's an assault on our peace, our quiet, our right to live in someplace

that's not the equivalent of a war zone, not a crazy zoo of construction sites in every direction." (*Michael Disend 2*) **[B.10.2]**

"I ask that you, the SF planning commission, send Pine and Franklin project back to the drawing board and not give the go-ahead for it to begin until those of us who live here have a chance to recuperate and breathe freely again. Because, as it is now, this once lovely NEIGHBORHOOD has turned into a near nightmare for residents." (*Michael Disend 1*) **[B.9.5]**

"I ask that you, the SF Planning Commission, send Pine and Franklin project back to the drawing board and not give the go-ahead for it to begin until those of us who live here have a chance to recuperate and breathe freely again. Because, as it is now, this once lovely NEIGHBORHOOD has turned into a near nightmare for residents." (*Michael Disend 2*) **[B.10.5]**

Response GC-1

These comments concern the merits of the proposed project and do not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts. Comments expressing opposition to or support for the project may be considered by the Planning Commission in its review of the Conditional Use and PUD permits. See Section 1, Land Use, and Section 6, Noise, located on pp. 31-33 and pp. 54-61 of the Initial Study (see Appendix A of the Draft EIR) for a discussion of the project's land use and noise impacts, respectively.

Comment GC-2 – Time of Planning Commission Hearing

"The notice posted at the site states that the hearing will take place at City Hall, Room 400, "not before noon." Do you have a definite time when the hearing will take place? If not, do you suggest the public should plan to be there at noon?" (*Jean Hansel*) **[B.1.1]**

Response GC-2

This comment does not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts.

Comment GC-3 – Comment in Support of the Proposed Project

"In regards to historical buildings, these are some of the ugliest buildings in San Francisco residential area and should be destroyed. There are also enough auto dealers in the city. This project would create living space for 21st century workers and give an economic boost to the area. A car rental used to be

there, and there is nothing historical about it. I believe there was an accounting firm in one of the buildings." (*Dan Bane*) **[B.3.2]**

Response GC-3

This comment does not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts. See Section 2, Aesthetics, located on pp. 34 through 45 of the Initial Study (see Appendix A of the Draft EIR) for a discussion of the project's impacts with regard to aesthetics.

Comment GC-4 – Use of Technical Language in the Draft EIR

"This Draft Environmental Impact Report needs further clarification and plainer, less technical language to explain impacts regarding wind and traffic." (*Gerald D. Adams*) **[B.8.1]**

Response GC-5

The commenter does not identify any specific examples of text that needs clarification so it is not possible to respond in more detail. It is necessary to use some technical language to explain wind and traffic impacts, but overall the Planning Department maintains that the Draft EIR strikes the right balance between technical language and language that is understandable to the layperson.

H. LAND USE

Comment LU-1 – Project Height and Density

"Additionally, the project is very dense. They primarily compare themselves to the highest buildings in the neighborhood and leave out consideration of all of the things west that are much shorter, that are residential buildings." (*Patricia Lovelock*) **[TR.3.3]**

Response LU-1

The project site is located within the 130-E Height and Bulk District, which permits structures up to a height of 130 feet. As a result, taller structures have been planned for the area, and as discussed in Chapter III, Plans and Policies, located on pp. III-4 to III-5 of the Draft EIR, at a maximum height of 130 feet, the proposed building is within the bulk and height limits planned for the site.

As discussed in Section 1, Land Use and Land Use Planning, located on pp. 32 through 33 of the Initial Study (see Appendix A of the Draft EIR), although the project site would be converted

from commercial and industrial uses to mostly residential with some commercial uses, this change in land use would not be substantially or demonstrably incompatible with existing commercial and high-density residential uses in the project area. The proposed project would change the land use and density of development at the project site, but the general character of the site would remain urban. Building setbacks would remain the same, and the proposed project would generally occupy the same footprint as the existing buildings on the project site. Although the project would intensify use and substantially change the character of the site itself, it would be similar in size, character, and use to other residential structures in the project vicinity.

Comment LU-2 – Compatibility of the Proposed Project with nearby Buildings

"Page 287 of the pdf, p. 32 of the Initial Study: Impact LU3 - The report concludes that there would be a Less than significant impact on the character of the neighborhood."

"Figure 18 abuses perspective and uses a misleading wide angle photo-rendering, thus misrepresenting what a person at the corner would see, and artificially diminishing the visual impact."

"Figure 22 looking W along Pine is taken from an angle such that it does not represent the view driver in center would see or the view of pedestrian on N sidewalk. The photo's angle is not directly along the axis of Pine St. Both of these photo-renderings misrepresent what would be a new urban canyon should the project be approved as proposed."

"Similarly, the proposed building does not step down to the West - thus creating yet another new building with an abrupt transition from the heights E of Franklin to the building heights W of Franklin. Repeating the mistake of the massing of the San Francisco Towers to the S of the proposed project does not respect the existing neighborhood character."

"The proximity to the San Francisco Towers creates an urban canyon, with building heights approaching twice the street (with sidewalks) width (roughly 70 feet) adversely affecting the existing human scale of the neighborhood, and significantly changing the view corridor that exists along the Pine Street axis. Concluding that this is a less than significant impact to neighborhood character ignores the reality, a task made easier by the misleading photo renderings that intentionally use angles and perspective to minimize the visual impacts." (*Paul Wermer*) **[B.12.1]**

Response LU-2

The perspectives used in Figures 18 and 22 on p. 38 and p. 42 of the Initial Study (see Appendix A of the Draft EIR) are similar to the perspectives utilized in other environmental documents

prepared by the Planning Department. Concerning Figure 18, a wide-angle lens was not used to take the "before" photograph of the project site, and the simulated image uses the photograph to indicate how the project would appear as viewed from this intersection. The project site is located within the 130-E Height and Bulk District, which permits structures up to a height of 130 feet. As a result, taller structures have been planned for the area, and as discussed in Chapter III, Plans and Policies, located on pp. III-4 to III-5 of the Draft EIR, at a maximum height of 130 feet, the proposed building is within the bulk and height limits planned for the site. As discussed in Section 1, Land Use and Land Use Planning, located on p. 33 of the Initial Study (see Appendix A of the Draft EIR), the proposed project would be consistent with taller, modern buildings located in the neighborhood at 1661 Pine (San Francisco Towers), 1700 California Street, and 1500 Van Ness Avenue (Holiday Inn). Therefore, the proposed project is consistent with the existing and planned character of the neighborhood.

Comment LU-3 – Neighborhood Character

"Page 287 of the pdf, p. 32 of the Initial Study: Impact LU3 - The report concludes that there would be a less than significant impact on the character of the neighborhood. Concluding that this is a less than significant impact to neighborhood character ignores the demolition or partial demolition of the Historic Auto Row buildings and replacing a layered landscape with a wall to wall glass box." (*Marlayne Morgan 2*) **[B.15.1]**

Response LU-3

Neighborhood character impacts concern how the height, bulk and design of a proposed project related to the size, height, design, and use of existing buildings in a neighborhood, while historic architectural impacts concern the demolition or alteration of an eligible or designated historic resource on a project site. As discussed in Section 1, Land Use and Land Use Planning, located on p. 32 of the Initial Study (see Appendix A of the Draft EIR), buildings in the vicinity of the project site consist of older buildings built between 1910 and 1930 and newer buildings built between 1970 and 2000. Therefore, the placement of the proposed structure within a neighborhood that contains a mix of older and modern buildings would not adversely affect neighborhood character. In addition, the project would include residential and retail uses that are permitted within the NC-3 District, and is located within the 130-E Height and Bulk District, which permits structures up to a height of 130 feet. As a result, taller structures have been planned for the project site. Impacts on historical architectural resources are discussed in Section IV.A, Cultural and Paleontological Resources, located on pp. IV.A-21 to IV.A-25 of the Draft EIR. That analysis concluded that the construction of the proposed project would result in a significant and

unavoidable impact to historic architectural resources as the proposed project would result in the *de facto* demolition of the Pine Street Auto Shops Historic District and two buildings that are individually eligible for California Register of Historical Resources.

LU-4 – Effects of High-Density Growth

"Section V of the DEIR is a cursory analysis of the impact of high-density growth (similar to the proposed project) will have on the immediate nearby 6 square block area, as well as the greater area of "downtown" San Francisco. It does not propose to mitigate any of the "quality of life" issues for denizens of the neighborhood, including wind, shadows, crowding, traffic volume, transportation congestion, etc. The effect of creating a dark, windswept "tunnel" on this block of Pine Street is unseen anywhere else in the city, except in the Financial District and South of Market, where wind impacts are not as severe owing to Nob Hill's sheltering effect from the predominantly northwest winds. Will this project lead to the creation of other "conditional use" bleak blocks, in the excuse of creating market-rate housing? The DEIR does not analyze this potential city-wide environmental impact." (*I.L. Girshman*) **[B.14.13]**

Response LU-4

Section V, Other CEQA Issues, located on pp. V-1 to V-5 of the Draft EIR, provides an adequate analysis of growth-inducing impacts of the proposed project. The analysis found that the project would not represent a significant growth in housing stock as the City as a whole is expected to add 68,320 households between 2010 and 2035. In addition, the project site is already served by existing infrastructure and no expansion is needed.

Wind impacts are addressed in Section IV.C, Wind, located on pp. IV.C-5 to IV.C-11 of the Draft EIR, while traffic-related impacts of the proposed project are addressed in Section IV.B, Transportation and Circulation, located on pp. IV.B-34 to IV.B-65 of the Draft EIR. Shadow impacts of the proposed project are addressed in Section 9, Wind and Shadow, located on pp. 97 through 98 of the Initial Study (see Appendix A of the Draft EIR). The analysis in the Draft EIR and Initial Study concluded that wind and shadow impacts of the proposed project would be less than significant and no mitigation is required. However, the analysis in the Draft EIR found that the proposed project would have a project- and cumulative-level traffic impact to the intersection of Van Ness Avenue and Pine Street and provides mitigation to reduce this traffic impact, although the impact would remain significant and unavoidable.

As discussed in Chapter II, Project Description, located on p. II-6 of the Draft EIR, the proposed project design would feature two 13-story towers that would retain the façades of three existing historic buildings on the project site. Deeply articulated precast panel systems would present

different expressions at the base and top of the buildings. Individual façades would further respond to the street context on which they present themselves. The precast wall systems would be punctuated with areas of window wall systems, as well as areas of recessed and projected balconies to modulate and provide scale to building volumes. Given these design features, the proposed project would not lead to the creation of a "bleak block" along Pine Street. In addition, it is speculative to assume that the proposed project would lead to the creation of other "bleak blocks," as other projects proposed in the area would be required to follow existing City codes and undergo design review.

I. AESTHETICS[8]

Comment AE-1 – Urban Morphology

"What the EIR fails for me to do is really give an overview of urban morphology that is historic development patterns on a northwest up-sloping site, which the project site is. The experience of driving up Pine Street is not one of driving through a canyon, as this project as proposed would suggest, but one of opening views towards the uphill historic preservation parts of Haas-Lilienthal House, et cetera. And that is the beauty when you come out of the busy medium-to-high-rise downtown and basically move to the residential portions of Pacific and Lower Pacific Heights. The EIR fails to address the morphology by which intentionally the buildings going up Pine were kept at a certain height and a certain mass." (*Planning Commissioner Moore*) **[TR.7.2]**

Response AE-1

The proposed project is located within the *Planning Code's* 130-E Height and Bulk District, which permits structures up to a height of 130 feet. As discussed in Chapter III, Plans and Policies, located on pp. III-4 to III-5 of the Draft EIR, at a maximum height of 130 feet, the proposed building is within the bulk and height limits planned for the site. The 130-E Height and Bulk district generally straddles both sides of Franklin Street between California Street to the north

8 As discussed in Draft Revisions on p. RTC.IV-6, aesthetics impacts are no longer to be considered in determining if a project has the potential to result in significant environmental effects under SB 743 if a project meets all of the following three criteria: (1) the project is in a transit priority area; (2) the project is on an infill site; and (3) the project is residential, mixed-use residential, or an employment center. As demonstrated in a Transit-Oriented Infill Project Eligibility Checklist Memorandum prepared by the San Francisco Planning Department for the proposed project, available for review in File No. 2011.1306E at the Planning Department, 1650 Mission Street, Suite 400, the proposed project is a mixed-use residential and commercial project that is located on an infill site that is well served by transit, the CEQA analysis for the proposed project is not required to consider impacts associated with aesthetics. The responses to comments on aesthetics are provided for informational purposes only.

and Geary Boulevard to the south, and the City considered the morphology of the area when it set the height and bulk limits for the area along Franklin Street.

Comment AE-2 – Sensitivity to Adjacent Senior Home

"I would like to also suggest that the lack of attention to the three historic buildings has something to do with intentional neglect. This project was in front of minus an EIR a few years ago, at which it basically was pushed back by the Commission as being insensitive also to the adjoining seniors home, which was sensitively massed to have a large senior building, one, comply with the Van Ness Avenue plan and plan intent. It stepped back from Pine Street. It left light and air for the lower-floor dining areas and recreational portions of the elderly home. The swimming pool faces Pine Street."

"The EIR does not properly address that; nor does the EIR discuss the issue of changing qualities of light within the residential units which will be seriously affected, given that the project as proposed in the EIR basically has simplistic mega-sized, oversized residential blocks to say that this project meets the developer's objective." (*Planning Commissioner Moore*) **[TR.7.3]**

Response AE-2

The commenter's concerns relate to the merits of the proposed project, which are appropriate for consideration as part of project approval deliberations. The commenter does not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts.

Please note that the swimming pool within 1661 Pine Street (San Francisco Towers) faces Austin Street and does not face Pine Street. New shadows created by a project are considered a significant environmental impact under CEQA only when they negatively affect public open space under the jurisdiction of the San Francisco Recreation and Parks Department. The nearest public open space to the project site is Lafayette Park. As discussed in Section 9, Wind and Shadow, located on pp. 97-98 of the Initial Study (see Appendix A of the Draft EIR), shadows cast by the proposed project would not shade the nearest public open space area to the project site. Concerning residential units in the San Francisco Towers building located to the south of the project site, as discussed in the Initial Study, the proposed project would not increase the total amount of shading in the area above levels that are commonly and generally accepted in urban areas.

As discussed in Section IV.A, Cultural and Paleontological Resources, on IV.A-21 to IV.A-27 of the Draft EIR, while the proposed project would result in significant and unavoidable impact on historic architectural resources, the proposed project would retain and incorporate the façades of

three buildings. In addition, the project sponsor has agreed to implement Mitigation Measure M-CP-4a: Historic Preservation Plan and Protective Measures, Mitigation Measure M-CP-4b: Historic Resource Baseline Condition Study, Mitigation Measure M-CP-4c: Historic Resource HABS Documentation, and Mitigation Measure M-CP-4d: Permanent Interpretive Exhibits, located on pp. IV.A-23 to IV.A-24, to reduce impacts on historic architectural resources.

Comment AE-3 – Project Objectives and Building Design

"I suggest that the developer's objectives be shaped by what makes a good building in San Francisco. And that is what the EIR really needs to do, because we are not here to later on battle when it comes to conditional-use approval of a building to say that the EIR quantities properly were evaluated. I believe that the building as it stands is too large, unless it goes from a courtyard building to a more sprung-tower configuration and deals with the larger building objectives as they have been recognized by buildings which are already there."

"So I think the EIR as it stands, fails to describe a project which meets these larger objectives. We're not designing towers as an island. We're designing taller buildings in context. And it's the context of already taller buildings to the south that should help determine what the quantitative analysis of this EIR need to be." (*Planning Commissioner Moore*) **[TR.7.4]**

Response AE-3

Consistent with CEQA, the Draft EIR evaluates the project as proposed by the project sponsor, and presents the project objectives as put forth by the project sponsor. This comment concerns the merits of the proposed project and does not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts.

J. POPULATION AND HOUSING

Comment PH-1 – Provision of Below Market Rate Units

"Page 303 of the pdf, Initial Study, p. 4: Impact C-PH-1 - concludes that this would "... result in less than significant cumulative impacts on population and housing." Yet this project proposes 262 units of market rate housing. This conclusion ignores prior Planning Dept studies on the demand for low/moderate income housing created by adding market rate housing. The DEIR fails to analyze if this project provides adequate onsite BMR units to accommodate that moderate income demand increase. What is the forecast demand for low/moderate housing incurred per 100 units of market rate housing, and does that justify a "less than significant" conclusion?" (*Paul Wermer*) **[B.12.2]**

"Page 303 of the pdf, Initial Study, p. 4: Impact C-PH-1 - concludes that this would "... result in less than significant cumulative impacts on population and housing." This conclusion ignores prior Planning Dept studies on the demand for low/moderate income housing created by adding market rate housing. The DEIR fails to analyze if this project provides adequate onsite BMR units to accommodate that moderate income demand increase." (*Marlayne Morgan 2*) **[B.15.2]**

Response PH-1

As discussed in Chapter II, Project Description, located on p. II-8 of the Draft EIR, the project is subject to the City's Inclusionary Affordable Housing Program. The program requires that affordable housing be provided at 12 percent of the total number of dwelling units if provided on-site, or 17 percent if provided off-site. Alternatively, the project sponsor may pay an in-lieu Affordable Housing Fee. The project will comply with affordable housing requirements. Affordability of housing is not a CEQA issue.

K. NOISE

Comment NO-1 – Cumulative Operational and Construction Noise

"One block away on Bush and Franklin a 13-story tower is being erected at the present moment. Right below Van Ness three other towers are scheduled to begin construction next June. To have two 13-story 130-foot-tall towers directly across from a senior-living center and the suffering of the noise of that and the stress of it is something that I feel is unconscionable."

"This has been a quiet, tranquil, intimate neighborhood and we feel very strongly that we're basically being violated, as most of San Francisco is. There's a very great sentiment among us now that we're not being heard. We're not being seen." (*Michael Disend*) **[TR.1.2]**

"I must mention that already, on Bush and Franklin, one block over, another huge condo tower is being erected now. One block over from that site near Geary the demolition for yet another tower started several days ago, across from the Unitarian church. Plus, and this is GIGANTIC, the Cathedral Hill hospital project demolition is scheduled to start within a few days. And, I must add, another enormous condo housing project between Van Ness and Polk, already at the height limitations, is scheduled to begin early next year, June at the latest we're told."

"This is way, way, way too much for us who have lived here and been productive San Franciscans. Our lives are literally being destroyed by the constant noise and supposed "construction" which benefits only a small percentage of the population." (*Michael Disend 1*) **[B.9.3]**

"You may dismiss my words and be proud of the thousands of building permits handed out to those "interests" who now control San Francisco, and your concern for better SF economics may be sincere. But, rest assured, "construction" everywhere, plus the street work EVERYWHERE, has turned this once lovely, beautiful, sweet city into a swarming noisy hive which more and more resembles Hong Kong: nothing but high rise tower after high rise tower. Cold, Sterile. Noisy. Packed. All the lovely, rare character that set San Francisco apart is being destroyed at a breakneck pace."

"Worst of all, the voices of "real" San Franciscans are being utterly ignored. This is not what WE want to happen to San Francisco. What is written here is being expressed throughout the city." (*Michael Disend 1*) **[B.9.4];** (*Michael Disend 2*) **[B.10.4]**

"I must mention that already, on Bush and Franklin, one block over, another huge condo tower is being erected now. One block over from that site near Geary the demolition for yet another tower started several days ago, across from the Unitarian church. Plus, and this is GIGANTIC, the Cathedral Hill hospital project demolition is scheduled to start within a few days. And, I must add, another enormous condo housing project between Van Ness and Polk, already at the height limitations, is scheduled to begin early next year, June at the latest we're told."

"This is way, way, way too much for us who have lived here and been productive San Franciscans. Our lives are literally being destroyed by the constant noise and supposed "construction" which benefits only a small percentage of the population." (*Michael Disend 2*) **[B.10.3]**

Response NO-1

These comments concern the merits of the proposed project and do not raise any specific issues about the adequacy or accuracy of the Draft EIR's analysis of environmental impacts. Cumulative operational and construction noise impacts are analyzed in Section 6, Noise, located on pp. 60 and 61 of the Initial Study (see Appendix A of the Draft EIR) and were found to be less than significant. Because neither the proposed project nor the other cumulative projects in the vicinity are anticipated to result in a doubling of traffic volumes along nearby streets, the project would not contribute considerably to any cumulative traffic-related increases in ambient noise levels. Moreover, the proposed project's mechanical equipment and occupants would be required to comply with the Noise Ordinance, and therefore would not be expected to contribute substantially to any cumulative increases in the ambient noise as a result of the building's mechanical equipment or occupants. For these reasons, operational noise effects associated with the proposed project are not anticipated to combine with operational noise from other projects in the area to result in a significant cumulative impact.

Construction activities in the vicinity of the project site, such as demolition, excavation, grading, or construction of these buildings in the area, would occur on a temporary and intermittent basis, similar to the project. All of these projects would also be required to comply with the Noise Ordinance, which requires each construction project not to result in noise levels that exceed 80 dB(A) at 100 feet and not to increase the ambient noise level by 5 dB(A) at the property line of the project site, and in the event that the noise thresholds would be exceeded, to comply with the City's Noise Ordinance by limiting construction to take place between the hours of 8:00 PM and 7:00 AM. Project construction-related noise would be regulated by the Noise Ordinance and implementation of Mitigation Measure M-NO-2: Reduction of Construction Noise**,** located on pp. 58 and 59 of the Initial Study, which requires the implementation of a number measures to minimize construction noise. As such, construction noise effects associated with the proposed project would be temporary and are not anticipated to combine with construction noise from other projects in the area to result in a significant cumulative impact.

L. AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Comments AQ-1 – Increase in Air Pollution from Vehicle Traffic

"And the worst of it is the added pollution." (*Joyce W. Finlay*) **[B.2.2]**

"The project at 1634-1690 Pine Street is less than one block from Van Ness Avenue, where the 47 Van Ness and 49 Van Ness-Mission operate. It is one and a half blocks from the 19 Polk, two blocks from the 1 California inbound, three blocks from the 1 California outbound, and two blocks from the 2 Clement. It is also close to the 27 Bryant and the 38 Geary. This location has a walkability score of 98 percent, a transit score of 94 percent, and bicycle score of 80 percent, according the realtor website, Walk Score. Van Ness Avenue BRT, when it is launched in a few years, should enhance the transit score of this neighborhood."

"Page S-34 of the draft environmental impact report says, "The proposed project would cause a substantial increase in traffic that would cause the LOS at the intersection of Van Ness Avenue/Pine Street to decline from LOS D to LOS E in the AM peak hour and from LOS E to F in the PM peak hour," and would pose a significant and unavoidable impact after mitigation."

"In addition, the growing number of vehicles in San Francisco exacerbates air pollution. Studies just released from the World Health Organization have now classified air pollution as a whole as carcinogenic to humans, with the International Agency for Research on Cancer data indicating a strong connection, not only to lung cancer, but bladder cancer, adding to the list of diseases including heart disease and asthma."

"The increase in the number of vehicles in the neighborhood throughout the day – but especially during the morning and evening rush hours – will endanger people living in that area, particularly children, whose lungs are still developing, and the elderly and those who already have weakened hearts and lungs. While all the vehicles may be compliant with air quality standards, but the cumulative risk of so many additional vehicles in one neighborhood is unacceptable and presents a risk to those people exposed in that neighborhood."

"The Sierra Club strongly supports the unimpeded flow of mass transit and the safe passage of bicyclists and pedestrians as some of the best methods for combatting air pollution and climate change. The SC urges the project sponsor and the SF Planning Department to work together to lower the planned amount of parking." (*Susan Vaughan*) **[B.5.2]**

Response AQ-1

Impacts due to the emissions of criteria pollutants from project-related stationary sources (a diesel-fueled back-up generator engine and natural-gas-fired mechanical systems or boilers), operational vehicle trips, and area sources such as the use of natural gas for heating and cooking are addressed in Section 7, Air Quality, located on pp. 74-79 of the Initial Study (see Appendix A of the Draft EIR). Criteria pollutants include ozone precursors (nitrogen oxide [NOx]) and reactive organic gases [ROG]), carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO_2), and lead. See Section 7, Air Quality, located on pp. 63 through 65 of the Initial Study, for a detailed background discussion of criteria pollutants. The analysis on pp. 74 through 76 of the Initial Study found that emissions of criteria air pollutants during the project's operational phase would be below the thresholds of significance promulgated by the Bay Area Air Quality Management District (BAAQMD). As a result, the project would not violate an existing ambient air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in emissions of any criteria air pollutant.

The analysis contained on pp. 76 and 77 in the Initial Study also found that the proposed project's vehicle trips would not generate a substantial amount of toxic air contaminant (TAC) emissions that could affect nearby sensitive receptors. TACs are a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. See Section 7, Air Quality, located on pp. 65 through 67 of the Initial Study, for a detailed background discussion of TACs. The proposed project would generate 899 vehicles trips per day and passenger vehicles are not major sources of TACs. In addition, project traffic would not increase traffic volumes at the intersection of Van

Ness Avenue/Pine Street to more than 44,000 vehicles per hour, which is the screening threshold used by the BAAQMD to conduct CO impact analysis.

Finally, as discussed on p. 77 of the Initial Study, the project site is located in an area that experiences high levels of air pollution, and therefore has the potential to expose future project residents to substantial concentrations of air pollutants. However, Mitigation Measure M-AQ-4b: Air Filtration Measures, listed on p. 77 of the Initial Study, would require that the project sponsor install a filtered air supply system capable of removing 80 percent of outdoor particulates indoors, thus reducing this impact to a less than significant level. Finally, the provision of parking is not a source of vehicle trips, per San Francisco travel demand methodology; thus no impacts to air quality would occur as a result of providing parking as part of the proposed project.

Comment AQ-2 – Climate Change

"The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming."

"This portion of the EIR fails for the following reasons:"

"1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others."

"2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effects on river flows and ground water recharge. The impact thereof on the project's projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and global warming issues the short shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project."

"3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately."

"4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the document and the EIR is totally deficient in this regard."

"For the foregoing reasons, the EIR is fatally flawed." (*Nick R. Green*) **[B.16.3]**

Response AQ-2

The methodology for the analysis of air quality and greenhouse gas (GHG) emissions is presented in Section 7, Air Quality, and Section 8, Greenhouse Gas Emissions, of the Initial Study (see Appendix A of the Draft EIR) and is based on guidelines prepared by the BAAQMD. The guidelines produced by the BAAQMD are public documents, with all supporting evidence, data, and methodologies available from the BAAQMD. Regarding the analysis of health risks resulting from exposure to toxic air contaminants, as discussed in the Initial Study on pp. 62 through 80 of Appendix A of the Draft EIR, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. The project site is in an area with poor air quality (identified as a 'hot spot' in the Initial Study), and thus subject to construction and operational mitigation measures that would reduce to less than significant those impacts related to exposure of sensitive receptors to toxic air contaminants. The BAAQMD recommends that local agencies adopt a Greenhouse Gas Reduction Strategy and that projects be reviewed to determine the significance of their GHG emissions based on the degree to which that project complies with the Greenhouse Gas Reduction Strategy. As described in the Initial Study, this recommendation is consistent with the approach to analyzing GHG emissions outlined in the *State CEQA Guidelines*, and the proposed project is compliant with the City's Greenhouse Gas Reduction Strategy as demonstrated by completion of the Compliance Checklist for Greenhouse Gas Analysis. The Initial Study explains the manner and methodology used by the BAAQMD and the City and County of San Francisco to support the conclusions of the air quality and greenhouse gas analysis.

The City's water supply consists of water imported from the Hetch Hetchy Project (85 percent) and local production (15 percent). The reliability of this supply is analyzed in the *2010 Urban Water Management Plan (UWMP) for the City and County of San Francisco* prepared by the San Francisco Public Utilities Commission (SFPUC). The UWMP specifically discusses the effect of global climate change on water supplies. An assessment of the potential effects of climate change on the regional water system was performed as part of the UWMP. This assessment evaluated a temperature rise of 1.5 degrees Celsius (°C) between 2000 and 2025 with no change in precipitation. The assessment found that about 7 percent of the runoff currently draining into

Hetch Hetchy Reservoir will shift from the spring/summer seasons to the fall/winter seasons in the Hetch Hetchy basin by 2025. This percentage is within the current inter-annual variation in runoff and is within the range accounted for during normal runoff forecasting and existing reservoir management practices.[9] As a result, water supply from the Hetch Hetchy Reservoir is expected to remain stable in the foreseeable future. The GHG emissions from the proposed project, by themselves, would have an immeasurable effect on global climate and by that token on the City's water supply source.

Climate change may affect air quality, but only indirectly through an influence on general climate conditions and meteorology. There is no indication from the BAAQMD or the California Air Resources Board that GHG emissions have any substantial impact on local or regional air quality. Direct impacts of the project on air quality are addressed in Section 7, Air Quality, of the Initial Study.

Section 7, Air Quality, and Section 8, Greenhouse Gas Emissions, of the Initial Study (see Appendix A of the Draft EIR) provide a discussion of project impacts related to criteria pollutant and GHG emissions. As the impact from a project's criteria pollutant and GHG emissions is essentially a cumulative impact, the analysis presented in these sections provides an adequate analysis of the proposed project's cumulative impact related to criteria pollutant and GHG emissions. The analysis in Section 7, Air Quality, indicated that because the proposed project's construction and operational emissions would not exceed project-level thresholds for criteria pollutants, the project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts. The analysis in Section 8, Greenhouse Gas Emissions, found that the proposed project would be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*, and thus the proposed project would result in a less than significant with respect to GHG emissions. Finally, Section 11, Utilities and Service Systems, of the Initial Study (see Appendix A of the Draft EIR) provides a discussion of cumulative water supply impacts. The analysis indicated the proposed project and cumulative projects would not have a significant cumulative effect on future water supplies because the City took into account future growth in the City when planning for these supplies. Also see **Response UT-1**, below.

9 2010 Urban Water Management Plan for the City and County of San Francisco, 2010, p. 91

M. SHADOW

Comment WS-5 – Shadow Effects

"No shadow impacts were assessed by the DEIR. The project would appear to have shadow impacts along both Franklin and Van Ness, including the cable car terminus on in the middle of California, as well as other spots along California Street and its intersection with Van Ness." (*I.L. Girshman*) **[B.14.12]**

Response WS-5

Shadow impacts are analyzed in Section 9, Wind and Shadow, located on pp. 97 and 98 of the Initial Study (see Appendix A of the Draft EIR). While the proposed project would shade areas along Franklin Street and Van Ness Avenue, including the cable car terminus on in the middle of California, as well as other spots along California Street and its intersection with Van Ness Avenue, the project's shadow effects would be limited in scope and would not increase the total amount of shading above levels that are commonly and generally accepted in urban areas. The Initial Study concludes that shadow impacts would be less than significant; thus, the topic is not discussed in the Draft EIR.

N. UTILITIES AND SERVICE SYSTEMS

Comment UT-1 – Water Supply

"The EIR (or DEIR – the terms are used interchangeably herein) does not adequately address the issue of water supply, which in California, is a historical environmental problem of major proportions."

"What the DEIR fails to do is:"

"1. Document wholesale water supplies;"

"2. Document Project demand;"

"3. Determine reasonably foreseeable development scenarios, both near-term and long-term;"

"4. Determine the water demands necessary to serve both near-term and long-term development and project build-out."

"5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;"

"7. Identify the likely yields of future water from the identified sources;"

"8. Determine cumulative demands on the water supply system;"

"9. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;"

"10. Identify the environmental impacts of developing future sources of water; and"

"11. Identify mitigation measures for any significant environmental impacts of developing future water supplies."

"12. Discuss the effect of global warming on water supplies."

"There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future."

"For the foregoing reasons, this EIR is fatally flawed." (*Nick R. Green*) **[B.16.2]**

Response UT-1

As discussed in Section 11, Utilities and Service Systems, located on pp. 102 and 103 of the Initial Study (see Appendix A of the Draft EIR), the proposed project would require approximately 18,888 gallons of water per day. The proposed project would be adequately served by existing entitlements and water resources available to the City as the project would not result in a population increase beyond that assumed for planning purposes by the San Francisco Public Utilities Commission (SFPUC).

The UWMP prepared by the SFPUC documents water supplies available to the City, which include imported water from the Hetch Hetchy Project (85 percent) and local production (15 percent). Water demands in the City are based on population projections, and development scenarios based on residential units and non-residential building space were not considered. Water supply and demand is projected out to the year 2035, and the amount of water to supply demand is considered highly reliable under normal, dry, and multi-dry year scenarios based on existing water recovery and storage projects and water transfer agreements with other water agencies.[10]

See the **Response AQ-2**, above, for a discussion of the effect of climate change on the City's water supply.

10 2010 Urban Water Management Plan for the City and County of San Francisco, 2010, pp. 66-72

O. BIOLOGICAL RESOURCES

Comment BI-1 – Loss of Existing Trees

"There are several large trees on the property, some of which are located at what is now a parking lot at the corner of Pine and Franklin. There are also several large trees lining Pine Street at the site. Do the current plans call for these trees to be removed and relocated? If not, what is the process involved to save these trees from destruction?" (*Jean Hansel*) **[B.1.2]**

"My concern is the three beautiful really old trees that go up Franklin Street. When I look at the design pictures of what I imagine will be a 13- or 14-story building, I do not see those trees being accommodated, and they really should be. .. I'm concerned about the fate of those three trees, and they really should be accommodated." (*Steven Kushner*) **[B.7.1]**

Response BI-1

See **Response CP-2**, on pp. RTC.III-7 to RTC.III-8 for a discussion of impacts to existing trees on the project site. Landscaping would also be added as part of the streetscape plan for the two building frontages.

P. ENERGY

Comment ME-1 – Energy Savings

"The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the Project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical; the proposed project, which would have a total area of 353,360 gsf and would include approximately 262 new for-sale residential units totaling approximately 221,760 sf; 5,600 sf of commercial space, and 34,600 sf of subterranean parking with 245 parking spaces on one level, will devour copious quantities of electrical energy, as well as other forms of energy." (*Nick R. Green*) **[B.16.1]**

Response ME-1

As discussed in Section 17, Mineral and Energy Resources, located on p. 126 of the Initial Study (See Appendix A of the Draft EIR), new buildings in San Francisco are required to conform to energy conservation standards specified by the San Francisco Green Building Ordinance

(SFGBO), which would require the project to exceed energy and water efficiency standards above and beyond Title 24 of the California Building Code (2010). Documentation showing compliance with these standards would be submitted with the application for the building permit. The SFGBO and Title 24 are enforced by the Department of Building Inspection.

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IV. DRAFT REVISIONS

This chapter presents text changes for the 1634–1690 Project Draft Environmental Impact Report. The first part of this chapter presents revisions to the Draft EIR gathered from the responses in **Chapter III, Comments and Responses**. The second part of the chapter lists staff-initiated text changes to add minor information or clarification related to the proposed project and to correct minor inconsistencies and errors. Deleted text is struck through and new text is underlined.

The text revisions presented below clarify, expand, or update the information presented in the Draft EIR. The revised text does not provide new information that would call for changes to any of the conclusions of the Draft EIR, or result in any new significant impact not already identified in the Draft EIR or any substantial increase in the severity of an impact identified in the Draft EIR.

A. CHANGES IN RESPONSE TO COMMENTS

The following text has been inserted to p.IV.A-5 after the fourth paragraph of the Draft EIR:

> In 1942 at the beginning of World War II, the owners of 1660 Pine Street stored the personal belongings of their Japanese-American neighbors just before they were sent to internment camps in the western United States. The belongings were stored in locked compartments on the third floor of the building. After the war, all of the items were safely returned to their owners.[1]

This revision does not change the analysis or conclusions presented in the Draft EIR.

B. STAFF-INITIATED CHANGES

Summary

Page S-1, last paragraph, third sentence of the Draft EIR has been revised as follows:

> The proposed building would have a total area of 353,360 gross square feet (gsf) and would include approximately 262 new residential units totaling approximately 221,760 sf; 5,600 sf of commercial space, and 34,600 sf of subterranean parking with 245 parking spaces on one level and ~~91~~ 141 bicycle parking spaces.

This revision does not change the analysis or conclusions presented in the Draft EIR.

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1 Beyer, Joe, "A Family Name Fades Away – For 67 years, Pops Deovlet and Suns Furnished the Neighborhood," *New Fillmore*, December 2007.

The following text has been inserted into p. S-2 of the Draft EIR in the last paragraph and into p. I-1 of the Draft EIR after the second paragraph:

> This EIR provides information on the potential impacts of the proposed project related to cultural and paleontological resources, transportation and circulation (except for design hazards), and wind.
>
> On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other things, SB 743 added Section 21099 to the Public Resources Code and eliminated the analysis of aesthetics and parking impacts for certain urban infill projects under the California Environmental Quality Act (CEQA). The proposed project meets the definition of a mixed-use residential project on an infill site within a transit priority area as specified by Section 21099. Senate Bill 743 became effective subsequent to publication of the Notice of Preparation/Initial Study and the Draft EIR, which collectively include analyses of aesthetics and parking impacts. The CEQA analysis found these impacts to be less than significant. Aesthetics is discussed for informational purposes in the initial study, while parking is discussed for informational purposes in Draft EIR Chapter IV.B, Transportation and Circulation. (See p. RTC.IV-3 for further discussion of SB 743 and Public Resources Code Section 21099.)
>
> All impacts of the proposed project and associated mitigation measures identified in this Draft EIR are summarized in **Table S-1, Summary of Impacts, Mitigation Measures, and Improvement Measures Identified in the EIR**, beginning on p. S-4. The impacts are listed in the same order as they appear in the text of **Chapter IV, Environmental Setting and Impacts**, of this document. This table identifies the potential impacts that the proposed 1634–1690 Pine Street Project would have on the physical environment. Where applicable, this table identifies mitigation measures that would reduce the identified impact(s) to less than significant levels. In addition, the table summarizes the improvement measures identified in the EIR to reduce the less than significant impacts of the project.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Table S-1 of the Draft EIR, pp. S-13 to S-14, has been revised as follows:

Table S-1 (Excerpt)

Impact	Level of Significance before Mitigation	Mitigation Measures and Improvement Measures	Level of Significance after Mitigation
Cultural Resources and Paleontological Resources			
CP-4: The proposed demolition and *de facto* demolition of the buildings located at 1634–1670 Pine Street would cause a substantial adverse change in the significance of historic architectural resources.	S	**M-CP-4a: Historic Preservation Plan and Protective Measures**. A historic preservation plan shall be prepared and implemented to aid in preserving those portions of the historic district and individual historical resources that would be incorporated into the project. The plan shall establish measures to protect the remaining elements of the historical resources during construction, particularly the unreinforced masonry building façades from vibration effects. If deemed necessary upon further condition assessment of the buildings, the plan shall include the preliminary stabilization of deteriorated or damaged masonry prior to construction. The historic preservation plan shall also further investigate and incorporate preservation recommendations regarding the potential historic materials that comprise the façades and other elements of the historical resources to be retained. The plan shall be prepared by a qualified architectural historian who meets the Secretary of Interior's Professional Qualification Standards (36 CFR, Part 61). The project sponsor shall ensure that the contractor follows these plans. The protection plan, specifications, monitoring schedule, and other supporting documents shall be incorporated into the building permit application plan sets. <u>The documentation shall be reviewed and approved by a Planning Department Preservation Specialist.</u> **M-CP-4b: Historical Resource Baseline Condition Study**. Prior to construction, a historic preservation architect and a structural engineer shall undertake an existing condition study of the three buildings whose facades are to be retained. The purpose of the study would be to establish the baseline condition of the buildings prior to construction. The documentation shall take the form of written descriptions and visual illustrations, including those physical characteristics of the resource that convey its historic significance and that justify its inclusion on, or eligibility for inclusion on, the California Register. The documentation shall be reviewed and approved by ~~the Planning Department~~ <u>a Planning Department Preservation Specialist</u>.	SUM

Table S-1 (continued)
Summary of Impacts, Mitigation Measures, and Improvement Measures Identified in the EIR

Impact	Level of Significance before Mitigation	Mitigation Measures and Improvement Measures	Level of Significance after Mitigation
Cultural Resources and Paleontological Resources (continued)			
		The structural engineer shall make periodic site visits to monitor the condition of the resource, including monitoring of any instruments such as crack gauges. The structural engineer shall consult with the historic preservation architect to ensure that character-defining features are protected, especially if any problems with character-defining features of the historic resource are discovered. If in the opinion of the structural engineer, in consultation with the historic preservation architect, substantial adverse impacts to the historic resource related to construction activities are found during construction, the monitoring team shall so inform the project sponsor or designated representative responsible for construction activities. The project sponsor shall adhere to the monitoring team's recommendations for corrective measures, including halting construction in situations where construction activities would imminently endanger the historic resource. The monitoring team shall prepare site visit reports and submit them for review by ~~the Planning Department~~ a Planning Department Preservation Specialist. **M-CP-4c: Historic Resource HABS Documentation**. Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS) documentation of the subject property, structures~~;~~, objects; materials; and landscaping. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The documentation shall consist of the following:	

This revision does not change the analysis or conclusions presented in the Draft EIR.

Table S-1 of the Draft EIR, p. S-16, has been revised as follows:

Table S-1 (continued)
Summary of Impacts, Mitigation Measures, and Improvement Measures Identified in the EIR

Impact	Level of Significance before Mitigation	Mitigation Measures and Improvement Measures	Level of Significance after Mitigation
Cultural Resources and Paleontological Resources (continued)			
		M-CP-4d: Permanent Interpretive Exhibits. The project sponsor shall install permanent interpretive exhibits on the property that provide information to visitors and occupants regarding the history of the Pine Street Auto Shops Historic District, ~~and~~ the development of Van Ness Auto Row, and the buildings' association during the period of Japanese-American internment during World War II. The interpretive exhibit shall utilize images, narrative history, drawings, or other archival resources. The interpretive exhibits may be in the form of, but are not necessarily limited to plaques or markers, interpretive display panels, and/or printed material for dissemination to the public. The interpretive exhibits shall be installed at a pedestrian-friendly location, and be of adequate size to attract the interested pedestrian.	
C-CP-1: Disturbance of archaeological and paleontological resources, if encountered during construction of the proposed project, in combination with other past, present, and future reasonably foreseeable projects, would make a cumulatively considerable contribution to a significant cumulative impact on archaeological resources.	S	Implement **M-CP-2: Archaeological Testing for Project with Archaeological Research Design and Treatment Plan.**	LTS
C-CP-2: The proposed project, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would result in a significant cumulative impact on historic architectural resources.	S	Implement **M-CP-4a: Historic Preservation Plan and Protective Measures; M-CP-4b: Historical Resource Baseline Condition Study, M-CP-4c: Historic Resource HABS Documentation;** and **M-CP-4d: Permanent Interpretive Exhibits.**	SUM

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page S-33, Table S-3 of the Draft EIR has been revised as follows:

Table S-3 (Excerpt)

Environmental Topic	Proposed Project
Description:	
• Housing Units	262 units
• Height	130 feet
• Total Area	353,360 sf
• Area – Residential	221,760 sf
• Area – Retail/Commercial	5,600 sf
• Parking – Vehicle	245 spaces
• Parking – Bicycle	~~91~~ 141 spaces

This revision does not change the analysis or conclusions presented in the Draft EIR.

Chapter I, Introduction

Page I-1, second paragraph, last sentence of the Draft EIR has been revised as follows:

> A single subterranean parking level would provide 240 spaces with mechanical stackers and five spaces accessible to persons with disabilities, for a total of 245 parking spaces, and ~~91~~ 141 Class 1 bicycle parking spaces.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text has been inserted on p. I-1 of the Draft EIR after the 2nd paragraph:

> On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other things, SB 743 added Section 21099 to the Public Resources Code and eliminated the analysis of aesthetics and parking impacts for certain urban infill projects under the California Environmental Quality Act (CEQA). The proposed project meets the definition of a mixed-use residential project on an infill site located within a transit priority area as specified by Section 21099. Senate Bill 743 became effective subsequent to publication of the Notice of Preparation/Initial Study and the Draft EIR, which collectively include analyses of aesthetics and parking impacts. The CEQA analysis found these impacts to be less than significant. Aesthetics is discussed for informational purposes in the initial study, while parking is discussed for informational purposes in Draft EIR **Chapter IV.B, Transportation and**

Circulation. (See p. RTC.IV-3 for further discussion of SB 743 and Public Resources Code Section 21099.)

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text has been inserted on p. I-3 of the Draft EIR after the 2nd paragraph:

As noted above, the proposed project is subject to Public Resources Code Section 21099(d), which eliminates aesthetics and parking as impacts that can be considered in determining the significance of physical environmental effects under CEQA for projects meeting certain criteria. Public Resources Code Section 21099(d) became effective subsequent to publication of the Notice of Preparation/Initial Study and the Draft EIR, which collectively include analyses of aesthetics and parking impacts. The CEQA analysis found these impacts to be less than significant. The initial study discusses aesthetics under the topic of Aesthetics for informational purposes only while the EIR discusses parking under the topic of Transportation and Circulation for informational purposes only. (See p. RTC.IV-3 for further discussion of SB 743 and Public Resources Code Section 21099.)

This revision does not change the analysis or conclusions presented in the Draft EIR.

Chapter 2, Project Description

Page II-6, Table II-2 of the Draft EIR has been revised as follows:

Table II-2 (Excerpt)

Use/Characteristic	Area (gsf)/Amount
Bicycle Parking Spaces	~~91~~ 141

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page II-8, third paragraph, first sentence of the Draft EIR has been revised as follows:

The basement level would include space dedicated to bicycle parking that could accommodate approximately ~~91~~ 141 Class 1 bicycle parking spaces.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Chapter IV, Environmental Setting, Impacts and Mitigation Measures

The following text has been inserted on p. IV-3 of the Draft EIR after the 1st paragraph:

B. SENATE BILL 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 amended CEQA by adding Public Resources Code Section 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas.

Aesthetics and Parking Analysis

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

1. The project is in a transit priority area; and

2. The project is on an infill site; and

3. The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above three criteria and thus, this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.[2]

Public Resources Code Section 21099 became effective subsequent to publication of the Notice of Preparation/Initial Study and the Draft EIR, which collectively include analyses of aesthetics and parking impacts. The CEQA analysis found these impacts to be less than significant.

Public Resources Code section 21099(e) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources.

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2 San Francisco Planning Department, *Transit-Oriented Infill Project Eligibility Checklist*, *1634-1690 Pine Street Project, Case No. 2011.1306E*, March 11, 2014. This document is available for public review as part of Case No. 2011.1306E at the Planning Department, 1650 Mission Street, Suite 400.

As such, there will be no change in the Planning Department's methodology related to design and historic review.

The Planning Department recognizes that the public and decision makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. Therefore, the aesthetics analysis contained in the initial study is solely for informational purposes and is not used to determine the significance of the environmental impacts of the project, pursuant to Public Resources Code Section 21099.

Similarly, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision makers. Therefore, this EIR presents parking demand analysis for informational purposes and considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce on-site parking spaces that affects the public right-of-way) as applicable in the transportation analysis in Chapter 4, Section IV.B, Transportation and Circulation.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Section IV.A, Cultural and Paleontological Resources

Page IV.A-21, last bullet, last line of the Draft EIR has been revised as follows:

The proposed demolition would greatly diminish the historic integrity of ~~1634–4164~~ 1634-1644 Pine Street, which is both a contributor to the Pine Street Auto Shops Historic District and individually eligible for the CRHR under Criterion 1.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page IV.A-22, third and fourth bullets of the Draft EIR are revised as follows:

- **De facto demolition of 1660 Pine Street**. The project would demolish most of this building and retain only its façade. Approximately 3 percent of the structure, including the façade, would remain. The proposed demolition would greatly diminish the historic integrity of 1660 Pine Street, which is a contributor to the eligible Pine Street Auto Shops Historic District. Thus, the building would no longer retain historic integrity and it would no longer be a contributor to the eligible historic district.

- **De facto demolition of 1670 Pine Street**. The project would demolish most of this building and retain only its façade. Approximately 3 percent of the structure, including the façade, would remain. The proposed demolition would greatly diminish the historic integrity of 1670

> Pine Street, which is both a contributor to the Pine Street Auto Shops Historic District and individually eligible for the CRHR under Criteria 1 (Events) and 3 (Architecture). Thus, the building would no longer retain historic integrity and it would no longer be a contributor to the historic district or eligible for the CRHR.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text has been inserted after the last sentence of Mitigation Measure M-CP-4a on p. IV.A-23 of the Draft EIR:

> **Mitigation Measure M-CP-4a: Historic Preservation Plan and Protective Measures**
>
> The documentation shall be reviewed and approved by a Planning Department Preservation Specialist.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page IV.A-23, last sentence of the first paragraph of Mitigation Measure M-CP-4b of the Draft EIR has been revised as follows:

> **Mitigation Measure M-CP-4b: Historic Resource Baseline Condition Study**
>
> The documentation shall be reviewed and approved by ~~the Planning Department~~ a Planning Department Preservation Specialist.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page IV.A-23 to IV.A-24, last sentence of the second paragraph of Mitigation Measure M-CP-4b of the Draft EIR has been revised as follows:

> **Mitigation Measure M-CP-4b: Historic Resource Baseline Condition Study**
>
> The monitoring team shall prepare site visit reports and submit them for review by ~~the Planning Department~~ a Planning Department Preservation Specialist.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page IV.A-24, first sentence of the first paragraph of Mitigation Measure M-CP-4c of the Draft EIR has been revised as follows:

> **Mitigation Measure M-CP-4c: Historic Resource HABS Documentation**
>
> Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS) documentation of the subject property, structures~~;~~, objects; materials~~;~~, and landscaping.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page IV.A-24, Mitigation Measure M-CP-4d of the Draft EIR has been revised as follows:

> **Mitigation Measure M-CP-4d: Permanent Interpretive Exhibits**
>
> The project sponsor shall install permanent interpretive exhibits on the property that provide information to visitors and occupants regarding the history of the Pine Street Auto Shops Historic District, ~~and~~ the development of Van Ness Auto Row, and the buildings' association during the period of Japanese-American internment during World War II. The interpretive exhibit shall utilize images, narrative history, drawings, or other archival resources. The interpretive exhibits may be in the form of, but are not necessarily limited to plaques or markers, interpretive display panels, and/or printed material for dissemination to the public. The interpretive exhibits shall be installed at a pedestrian-friendly location, and be of adequate size to attract the interested pedestrian.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Section IV.B, Transportation and Circulation

Page IV.B-44, last sentence of first paragraph of the Draft EIR has been revised as follows:

> As the proposed project would provide ~~91~~ 141 bicycle parking spaces, the proposed supply would exceed San Francisco Code requirements, and impacts due to inadequate bicycle parking supply would be less than significant.

Page IV.B-44, second sentence of second paragraph of the Draft EIR has been revised as follows:

> The project would provide a total of ~~91~~ 141 Class I bicycle parking spaces located in the project's garage on Level P1 of the building.

Chapter VI, Alternatives

Page VI-4, Table VI-1 of the Draft EIR has been revised as follows:

Table VI-1 (Excerpt)

Environmental Topic	Proposed Project
Description:	
• Housing Units	262 units
• Height	130 feet
• Total Area	353,360 sf
• Area – Residential	221,760 sf
• Area – Retail/Commercial	5,600 sf
• Parking – Vehicle	245 spaces
• Parking – Bicycle	~~91~~ 141 spaces

Page VI-44, first paragraph of the Draft EIR has been revised as follows:

Alternate Full Preservation ~~Plan~~ Alternative

The Alternate Full Preservation ~~Plan~~ Alternative would preserve the front 50 percent of the buildings on the project site, but would construct a four-story building at the rear of the lots immediately behind the historic buildings so that the new building would be set back half the depth of the lot. A 13-story building would be constructed on the vacant lot (Lot 11A) at the corner of Pine and Franklin Streets. The Alternate Full Preservation ~~Plan~~ Alternative would have a total area of 142,000 gross square feet (gsf) and would include approximately 68 new residential units totaling approximately 60,000 sf; and 35,000 sf of retail space. ~~This alternative was considered but rejected because a more feasible full preservation alternative was designed that included more residential units (See Alternative C – Full Preservation Alternative above).~~

The Alternate Full Preservation Alternative was considered but rejected because it would fail to achieve the project objectives set forth in the Draft EIR and would be financially infeasible for the sponsor to construct. As noted in discussion of the No Project Alternative, three of the existing historic buildings are unreinforced masonry structures that would require expensive seismic upgrading prior to occupancy by new retail tenants. In addition, this alternative would reduce the buildable area of the lot and result in construction of 194 fewer residential units than the proposed project. The increase in retail space under this alternative would not be sufficient to make up for the loss of profit associated with a 75 percent reduction in residential units. Further, the Alternative Full Preservation Alterative would fail to meet the project sponsor's objectives of

maximizing the creation of new for-sale residential units or developing a project that is consistent with and enhances the existing scale and urban design character of the area. Finally, detailed analysis of this alternative was not required because it would offer no environmental advantages over the Full Preservation Alternative analyzed in the EIR, which would already reduce the development's CEQA impacts to historic architectural resources to a less than significant level with mitigation.

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APPENDIX A

Public Hearing Transcript Comments

RE: 1634-1690 PINE STREET

PUBLIC HEARING

ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

Thursday, November 7, 2013

Item F. 11. 2011.1306E

Commission Chambers - Room 400

City Hall, 1 Dr. Carlton B. Goodlett Place

San Francisco, California

REPORTED BY: FREDDIE REPPOND, STENOGRAPHIC REPORTER

A P P E A R A N C E S

SAN FRANCISCO PLANNING COMMISSION:

Commissioner Rodney Fong, President

Commissioner Cindy Wu, Vice President

Commissioner Michael Antonini

Commissioner Gwyneth Borden

Commissioner Rich Hillis

Commissioner Katharine Moore

Commissioner Hisashi Sugaya

Jonas Ionin, Commission Secretary

FOR THE PLANNING DEPARTMENT:

Jeanie Poling

Lisa Gibson

FROM THE PUBLIC:

Michael Disend

Desiree Smith

Patricia Lovelock

--oOo--

Thursday, November 7, 2013 1:34 p.m.

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P R O C E E D I N G S

SECRETARY IONIN: Commissioners, then we continue on your regular calendar on Item 11 for Case No. 2011.1306E, at 1634 through 1690 Pine Street, public hearing on the draft environmental impact report.

Please note that written comments will be accepted at the planning department until 5:00 p.m. on November 18th, 2013.

MS. POLING: Good afternoon, President Fong and Members of the Commission. I'm Jeanie Poling of the environmental planning section of the planning department.

This is a hearing to receive comments on the draft environmental impact report for Case No. 2011.1306E, the 1634 through 1690 Pine Street project.

Comments will be transcribed and responded to in writing in the responses-to-comments document, which will respond to all verbal and written comments received and make revisions to the draft EIR as appropriate.

Staff is not here to answer comments today.

Today's hearing is not to consider approval or disapproval of the project. The hearing to consider conditional-use authorization and planned unit

development authorization of the project will follow the final EIR certification. Comments today should be directed to the adequacy and accuracy of information contained in the draft EIR.

Commenters should speak slowly and clearly so that the court reporter can produce an accurate transcript. Also, commenters should state their name and address so that they can be properly identified and so that they can be sent a copy of the responses to comments when completed. After hearing comments from the general public, we will also take comments on the draft EIR by the Planning Commission.

The public comments period for this project began on October 3rd and extends until 5:00 p.m. on November 18th.

The draft EIR was presented to the Historic Preservation Commission for review and comment on October 16th. The commission subsequently submitted comments in writing. And this letter has been distributed to you today. Additional copies are also available for members of the public to review.

I'd like to note a change in the project. The draft EIR states that the project would include 91 bicycle-parking spaces. But the Planning Code now requires 141 Class 1 and 13 Class 2 bike-parking spaces.

The project sponsor has indicated that the project would comply with the Code and provide the required number of bicycle-parking spaces.

This concludes my presentation and I am available to answer any questions. Thank you.

VICE PRESIDENT WU: Thank you.

Opening it up for public comment, I have two cards. Michael Disend and Desiree Smith.

MR. DISEND: Thank you. My name is Michael Disend; and I live at 1777 Pine Street, within a block of the project; and I have lived there since 1996.

And I just want to reiterate what other people have said, that this is a neighborhood. And everybody that I've spoken to is unanimously and very, very strongly against this project.

TR.1.1

One block away on Bush and Franklin a 13-story tower is being erected at the present moment. Right below Van Ness three other towers are scheduled to begin construction next June. To have two 13-story 130-foot-tall towers directly across from a senior-living center and the suffering of the noise of that and the stress of it is something that I feel is unconscionable.

TR.1.2

This has been a quiet, tranquil, intimate neighborhood and we feel very strongly that we're

basically being violated, as most of San Francisco is. There's a very great sentiment among us now that we're not being heard. We're not being seen.

I'm not a professional agitator. I belong to no political group. But I have to tell that you something that really changed my mind happened within the last four weeks. At 7:00 a.m. I heard what sounded liked a bomb go off. I went outside my house. And on the corner of Pine and Gough a boy -- you probably read about it in the paper -- had been hit by a car going at a tremendous rate of speed. He died and the mother and sister were injured.

Now, that type of traffic never took place before on Pine Street. Now, day and night it's like an inferno of cars and noise beginning about 4:00 or 5:00 a.m. and going on into the evening.

To propose what you're proposing here, a garage with 245 more cars and then to have all this construction going on around us, is one more attack on the fiber and soul of San Francisco. I'm not going -- this sentiment is the reason why B and C were defeated. They were defeated because we love this city. We grew up and we care about it. We don't want to turn it into a place for the ultra-rich. This is not Hong Kong, full of towers. It's San Francisco, full of beauty and soul

TR.1.2

TR.1.3

TR.1.4

and heart. So I personally and everybody in my building that I've talked to stands adamantly against this project. And at the very least you can do is cut it down and make it smaller.

TR.1.4

Thank you for your attention.

MS. SMITH: Good afternoon, Commissioners. My name is Desiree Smith. I am preservation project manager for San Francisco Architectural Heritage. We have a few comments today. And I just want to point out that our comments are limited to a discussion of the draft EIR's adequacy and accuracy regarding the discussion on cultural resources.

As you know, the project site encompasses the entire Pine Street Auto Shops Historic District, which was identified by William Custer in the City's 2010 survey of Van Ness Auto Row support structures.

TR.2.1

Van Ness Auto Row was one of the most influential automobile industry centers on the West coast during the 1910s and 1920s. The eligible Pine Street Auto Shops Historic District is the only example that comprises more than two auto-related buildings from the 1910s standing adjacent to one another in or near the Van Ness Auto Row corridor.

Heritage strongly objects to the proposed treatment of historic resources under the proposed

project. The vast majority of the historic district would be demolished and new construction would completely overwhelm the remnants to be retained, with virtually no setbacks to separate new construction from the historic facade.

We agree with the planning department's determination that the project would result in significant adverse impacts to cultural resources including *de facto* demolition of the Pine Street Auto Shops Historic District and demolition of most of the existing five buildings on the project site, two of which are also individually eligible for listing on the California Register of Historic Resources.

TR.2.1

Furthermore, we agree with the planning department that implementation of proposed mitigation on measures would not adequately compensate for the loss of historic resources.

While the draft EIR accurately describes the project's impacts on cultural resources, it fails to evaluate a reasonable range of alternatives that would meaningfully reduce impacts on cultural resources and achieve most of the project objectives. In particular, we feel that the planning department should revise the so-called full-reservation alternative to enable it to more closely adhere to project objectives. This

TR.2.2

alternative could be modified by shifting more density to the vacant lot adjacent to historic buildings. The full-reservation alternative references Van Ness Avenue as a shared context, thereby limiting the height of the proposed residential towers to eight stories and significantly reducing the number of residential units. We believe that the context should be adjusted to more accurately reflect prevailing development patterns in the surrounding neighborhoods, including the 13-story tower directly across from Pine Street. This modification would allow a 13-story (sic) to be built at the corner of Pine and Franklin, increasing the number of units and allowing greater retention of the historic fabric, while enhancing the feasibility of the full-preservation alternative.

TR.2.2

We will also be submitting a comment letter to the planning department reiterating these points.

Thank you.

VICE PRESIDENT WU: Thank you.

Is there any further public comment?

MS. LOVELOCK: Hello again. My name is Patricia Lovelock and I live at 1777 Pine Street, which is partially up the block from this development -- proposed development.

I have been looking at the draft EIRs of a

TR.3.1

number of projects in my neighborhood and became very interested in the statistics that were given as far as the LOS for the different intersections. And in comparing either some proposed ones or the older ones or the ones that are coming now, or CPMC, most of them had at least three intersections in common. And it was very interesting how widely variant the numbers were, from like a C to an E or an F with another. So I think there is something very wrong with the reliability of that statistic.

TR.3.1

People in this neighborhood, as you heard the other person say, are very concerned about traffic, very concerned. We have so many injuries there. I've been pushing to get changes. We've gotten some changes, but people continue to get hit. So the number of cars going through there, especially with CPMC coming in and the bus rapid transit, their traffic analysis does not appear to take into account the fact that, now that they are not going to allow the left turns from Van Ness, that people are maybe going to be using Franklin to make left-hand turns up into the neighborhoods. That's pushing more and more traffic -- BRT already was going to push more traffic on Franklin and Gough. But now with the lack of the left-hand turns it's going to push even more. And these are residential areas. And so

TR.3.2

something needs to happen where people look at those statistics and try to figure out what is really accurate, because it goes all the way to gridlock.

TR.3.2

Additionally, the project is very dense. They primarily compare themselves to the highest buildings in the neighborhood and leave out consideration of all of the things west that are much shorter, that are residential buildings.

TR.3.3

Having no off-street loading is going to be a problem, because it's on Pine Street. And the minute something blocks traffic, it's a mess. You get the weaving in and out of traffic and you get honking.

TR.3.4

Additionally, it does a terrible job of preserving the landmark. I don't know how you think it makes any sense to put modern structures in the middle of a historic district. They're not keeping the buildings together. They're interspersing them with the modern face and cutting significant trees.

TR.3.5

SECRETARY IONIN: Thank you. Your time is up.

VICE PRESIDENT WU: Thank you.

Any further public comment? Seeing none, public comment is closed.

Commissioner Antonini.

COMMISSIONER ANTONINI: I had a question for staff. Reading the analysis of the parking, looks like

TR.4.1

we're only analyzing 245 parking places and we're going to have 262 units. So is -- isn't there a one-to-one requirement in this neighborhood for parking?

MS. POLING: I'll have to look into that.

COMMISSIONER ANTONINI: Okay. And I think if there is, then obviously we'd have to analyze the effects based upon having one-to-one parking.

MS. POLING: Well, there is a conditional-use authorization. I'm sure it will address any lack of parking that's required by Code.

COMMISSIONER ANTONINI: Well, yeah, I'm saying the other way around. If the Code dictates there be one-to-one parking -- I mean they can ask for less, obviously. The project sponsor can ask for less. But then one would assume that you would analyze what would be the Code-compliant alternative and not a lesser alternative.

MS. GIBSON: Lisa Gibson, planning department.

Thank you, Commissioner Antonini, for your comments. We will be receiving a transcript of the hearing and the questions that you pose and will respond to them in writing in our response-to-comments document.

COMMISSIONER ANTONINI: Okay. Thank you.

MS. GIBSON: Thank you.

COMMISSIONER ANTONINI: And while I'm asking

TR.4.1

TR.4.2

TR.4.3

questions, I'm trying to figure out. I notice all the different alternatives. It's a little unclear as to -- the preferred alternative, I guess, preserves just a small amount of the three historic buildings. And how -- I know it's probably in here, but how deep does that go?

VICE PRESIDENT WU: Commissioner Antonini, I'm sorry. I think we are just collecting comments today.

COMMISSIONER ANTONINI: Yeah. Okay. All right. Fine.

Well, that would be the question I want to know is a little bit more detail on -- it's probably in here -- but the differentiation between the various alternatives -- the full-preservation and the -- I've read parts of it and it does give you some detail. But that's important to know how that's all going to fit together.

VICE PRESIDENT WU: Commissioner Borden.

COMMISSIONER BORDEN: Yeah. I just wanted to associate myself with the comments that I guess that HPC provided related to the partial-preservation alternative, exploring shifting the stories to better preserve the buildings and also kind of further exploration of a real, more genuine full-preservation alternative in terms of the historic structures.

TR.4.4

TR.4.5

TR.5.1

VICE PRESIDENT WU: Commissioner Sugaya.

COMMISSIONER SUGAYA: Yes.

I think no matter what is addressed with respect to -- what am I trying to say?

In the analysis of the proposed project, not the alternatives, I think that the conclusion that there's substantial adverse impacts that can't be mitigated is correct, in that there isn't a whole lot that we can do in terms of preservation of those buildings if the proposed project moves ahead as it is designed.

But what I'd like to inject is that -- my belief is that facadism and the retention of the three building elevations does nothing. It doesn't increase the impact. It sort of tries to say it decreases the impact, but it's still an diverse impact. And if it's still an adverse impact, I think when the project comes around to the Commission, there ought to be a design that eliminates those facades. That approach to me went out decades ago and isn't a preferred approach to preserving historic structures, I don't think, anymore.

If you want to see one, there are examples around San Francisco, 10th and Folsom is a David Baker-designed project that retains one storefront -- not storefront -- warehouse front. I believe it is in

TR.6.1

brick. I think it looks -- I won't say the word. It looks terrible and does nothing to enhance the fact that that was once a historic building.

There's another one over on Sacramento and Sansome or Front, over that direction, which is retention of a corner piece of a building with an office high-rise behind it, or mid-rise behind it. So there are examples like that around that I don't think work at all.

TR.6.1

The other thing is I think that Historic Preservation Commission's comment on the alternative that says I think that there should be consideration given to increasing the 6-story portion to 13 to better meet the project sponsors programmatic requirements is something that should be looked at.

TR.6.2

VICE PRESIDENT WU: Thank you.

Commissioner Moore.

COMMISSIONER MOORE: Yeah. I would agree with Historic Preservation's Comments on the draft EIR fails to present a meaningful set of alternatives. A meaningful set of alternatives would go beyond facadism but would try residential towers in the back of a mid-block property would fully preserve the entire three buildings that are there.

TR.7.1

What the EIR fails for me to do is really give

TR.7.2

an overview of urban morphology that is historic development patterns on a northwest up-sloping site, which the project site is. The experience of driving up Pine Street is not one of driving through a canyon, as this project as proposed would suggest, but one of opening views towards the uphill historic preservation parts of Haas-Lilienthal House, et cetera. And that is the beauty when you come out of the busy medium-to-high-rise downtown and basically move to the residential portions of Pacific and Lower Pacific Heights. The EIR fails to address the morphology by which intentionally the buildings going up Pine were kept at a certain height and a certain mass.

TR.7.2

I would like to also suggest that the lack of attention to the three historic buildings has something to do with intentional neglect. This project was in front of minus an EIR a few years ago, at which it basically was pushed back by the Commission as being insensitive also to the adjoining seniors home, which was sensitively massed to have a large senior building, one, comply with the Van Ness Avenue plan and plan intent. It stepped back from Pine Street. It left light and air for the lower-floor dining areas and recreational portions of the elderly home. The swimming pool faces Pine Street.

TR.7.3

The EIR does not properly address that; nor does the EIR discuss the issue of changing qualities of light within the residential units which will be seriously affected, given that the project as proposed in the EIR basically has simplistic mega-sized, oversized residential blocks to say that this project meets the developer's objective.

TR.7.3

I suggest that the developer's objectives be shaped by what makes a good building in San Francisco. And that is what the EIR really needs to do, because we are not here to later on battle when it comes to conditional-use approval of a building to say that the EIR quantities properly were evaluated. I believe that the building as it stands is too large, unless it goes from a courtyard building to a more sprung-tower configuration and deals with the larger building objectives as they have been recognized by buildings which are already there.

TR.7.4

So I think the EIR as it stands, fails to describe a project which meets these larger objectives. We're not designing towers as an island. We're designing taller buildings in context. And it's the context of already taller buildings to the south that should help determine what the quantitative analysis of this EIR need to be.

VICE PRESIDENT WU: Thank you.

I'd like to add two areas that I'm interested in seeing examined further in the final EIR. One is about pedestrian safety especially during construction. This is a very dense area. Construction is very difficult, obviously, around a lot of existing structures and I think especially during construction we've been seeing difficulties for pedestrians. TR.8.1

The second is more detailed. It's the question about there's instruction to pay into the Van Ness BRT at a fair share. And so my question is how a fair share is calculated and what is put into that calculation. TR.8.2

Commissioner Antonini.

COMMISSIONER ANTONINI: Yeah. Another area that I agree with Commissioner Moore and it is addressed in the DEIR on pages 4-A-21 and 4-A-22 on historical architectural resource impacts. And most particularly the very last one says construction of an incompatible building within the boundary of the Pine Street Auto Shops Historic District. TR.4.6

And while this is more of a design issue, it is an issue that becomes under the context of the EIR because the EIR deals with historical preservation and impacts. And an impact of a building that does not have any context or little context with the existing auto

shops makes it even more of an impact. If the building had more features, such as masonry or others, that would make it more compatible with whatever is kept of those buildings, it would probably be less of an impact.

Whether you like it or not, the towers across the street have been build in the style that is somewhat reminiscent of the Van Ness area rather than being completely glassy new towers. So I think something along that line should be included in comments-and-responses what could be done to make the two, especially if the new building would be weaved in between what remains of the historic buildings. As someone pointed out, makes it even more of a contrast and I think better context particularly on the Pine Street facade would help a lot.

TR.4.6

VICE PRESIDENT WU: Commissioner Moore.

COMMISSIONER MOORE: I appreciate your mentioning the word "pedestrian safety." I do believe that the increase of people exiting onto Pine Street in that block will further accentuate the urban thoroughfare notion of having two one-way pairs taking traffic out of San Francisco and bringing it back downtown, that being Bush and Pine. Those are two very dangerous streets. One of the commenters commented on the accident which happened a few weeks ago.

TR.7.5

But what I am mostly concerned about, driving in that corridor frequently, is that the entire population of the assisted-care home for the elderly on Pine street really still tries to walk to Van Ness and to Whole Foods at the corner of Franklin and California. And they're encouraged to do so because it's a slight uphill exercise for them. And you often find yourself having to move slowly as they move across the intersection. And I believe that the increase in traffic or traffic mitigation which address that needs to be a serious responsibility of this EIR to address.

TR.7.5

VICE PRESIDENT WU: Thank you.

(This item concluded at 2:00 p.m.)

CERTIFICATE OF REPORTER

I, FREDDIE REPPOND, a stenographic reporter, 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 13th day of November, 2013.

_____

FREDDIE REPPOND

APPENDIX B

Draft EIR Comment Letters

SAN FRANCISCO
PLANNING DEPARTMENT

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

October 17, 2013

Ms. Sarah B. Jones, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: 1634-1690 Pine Street Draft Environmental Impact Report (Case No. 2011.1306E)

Dear Ms. Jones:

On October 16, 2013, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (EIR) for the proposed 1634-1690 Pine Street project. After discussion, the HPC arrived at the comments below:

- The Historic Preservation Commission recognizes that preservation options for a development of this proposed density are rather limited. That said, a project that renders the district ineligible for California Register is of great concern.

A.1.1

- The proposed project would entirely demolish two of the three historic buildings on the project site. It seems that the project sponsor should be able to preserve at least the facades of those two buildings, as is the case under the preservation alternatives. Even though this would be "facadism," it is preferable to wholesale demolition.

- Please explain how the Partial and Full Preservation Alternatives were formulated.

A.1.2

- The EIR should have considered a Partial Preservation Alternative with both towers being 13 stories, rather than one being 13 stories and the other being 6 stories. That would better satisfy the project sponsor's desire to develop a project that is financially feasible. Given that the six-story building is set back behind the remaining portions of the existing buildings under the Partial Preservation Alternative, increasing the tower height to 13 stories would not substantially change the feeling of the buildings' historicity conveyed at the street level.

A.1.3

- "Full Preservation Alternative" is a bit of a misnomer, given that this alternative would result in a significant impact to historic architectural resources – albeit a reduced impact compared to the proposed project. Please consider a more appropriate title for this alternative.

A.1.4

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

Sincerely,

for

Karl Hasz, President
Historic Preservation Commission

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-5559
TTY 711

Flex your power!
Be energy efficient!

November 1, 2013

SF101169
SF-101-5.87
SCH#2007042045

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

Dear Ms. Poling:

1634-1690 Pine Street – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the 1634-1690 Pine Street project. The following comments are based on the Draft Environmental Impact Report.

Traffic Analysis
It's not clear when this development would be ready for occupancy, particularly in relation to the Van Ness Bus Rapid Transit project. If it is within the approximate timeframe, the "Existing Plus Project" and "2035 Cumulative" conditions do not adequately evaluate traffic impacts. Also, please include a third scenario, "Existing Plus Project & Near-term Network Changes" conditions that evaluates the expected impacts before the 2035 horizon. "Near-term Network Changes" would include the Van Ness Bus Rapid Transit project and any other planned network changes that would be expected at that time.

A.2.1

Construction
Please be advised that pedestrian access through the construction zone of this project must be in accordance with ADA guidelines.

A.2.2

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

Sincerely,

ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"

From: jeanellen8@comcast.net
To: "Jeanie Poling" <Jeanie.Poling@sfgov.org>
Sent: Saturday, October 5, 2013 7:15:49 PM
Subject: EIR hearing on Nov. 7. 2013 re 2011.1306E

Ms. Poling: The above referenced hearing is regarding the proposed demolition of buildings and construction of a condo complex on Pine Street between Van Ness and Franklin. Would you please let me know the following information:

(1) The notice posted at the site states that the hearing will take place at City Hall, Room 400, "not before noon". Do you have a definite time when the hearing will take place? If not, do you suggest the public should plan to be there at noon?

B.1.1

(2) There are several large trees on the property, some of which are located at what is now a parking lot at the corner of Pine and Franklin. There are also several large trees lining Pine Street at the site. Do the current plans call for these trees to be removed and relocated? If not, what is the process involved to save these trees from destruction?

B.1.2

Thank you.

Jean Hansel
1563B Pine Street
San Francisco, CA 94109
415.706.7034

From: "Joyce W. Finlay" <JoyWFinlay@gmail.com>
Date: October 15, 2013 6:34:08 PM CDT
To: jeanie.poling@sfgov.org
Cc: gdadadams39@aol.com
Subject: 1634-1690 Pine St.

I can't imagine how you're going to put 245 additional cars on Pine Street or the corner of Pine and Franklin. Franklin's traffic is bad most of the day now and there's a gas station at the corner of Pine and Van Ness that empties onto Pine right where the garage door is supposed to be for the new building. And the worst of it is the added pollution. Also the corner of Pine and Van Ness and on Franklin at the Pine St. corner are wind tunnels now. They said studies had been done on the impact of a 13 story building on Pine St. and there would be no problem with wind due to the new building. Frankly I don't believe it. We have people living here at 1661 Pine St. (the SF Towers - a retirement community) who have difficulty staying upright with the wind problem now, and it's going to affect their quality of life if they can no longer walk in this area. Please keep me on your mailing list for this project. Thank you.

B.2.1

B.2.2

B.2.3

From: Daniel Bane
To: Poling, Jeanie
Subject: 1634 Pine
Date: Friday, October 18, 2013 4:12:19 PM
Attachments: image001.png

Dear Ms. Poling:

I live two block from the project and walk by everyday on the way to work. This project would be very beneficial for the neighborhood. Right now it's homeless people and unsafe to walk by at night. It would make Van Ness street more interesting and vibrant (possibly a BVLD. with cafes and restaurants, shops and a lot of foot traffic). (I walk a half hour to work each way a day) B.3.1

In regards to historical buildings, these are some of the ugliest buildings in San Francisco residential area and should be destroyed. There are also enough auto dealers in the city. This project would create living space for 21 1st century workers and give an economic boost to the area, A car rental used to be there, and there is nothing historical about it. I believe there was an accounting firm in one of the buildings. B.3.2

Also the residential towers would complement the senior residence home across the street. B.3.3

Please let me know if I should send my comments to someone else and whether I should attend the hearing.

Thank you for your time

Dan

Dan Bane, CPA | Director
Montage Services, Inc.
Direct: 415.659.9234 | Mobile: 415.572.3933
dan@montage-services.com www.montage-services.com

OFFICES IN: HOUSTON | LONDON | SAN FRANCISCO | SHANGHAI

San Francisco: 140 Geary Street, Suite 1000, San Francisco, California 94108

MONTAGE SERVICES INC

October 28, 2013

Jeanie Poling
Planning Dept. San Francisco

Dear Jeanie,

Thank you for responding to my email concerning the development of the 1600 block of Pine Street. Enclosed is the article mentioned in my email, along with the letter I sent to the developer. Please include this information in the Draft EIR for reference, as it respects the preservation of the building facade of my family's business.

Respectfully,

Roberta Wackler
1262 Pine Street
San Francisco, CA 94109
rwackler@comcast.net

Mr. Dean Givas, President

Oyster Development Corporation
50 California Street #1500
San Francisco CA, 94111

October 18, 2013

Dear Mr. Givas,

I feel that a letter of gratitude to you and your firm is appropriate for your role in creating a most respectful buildirg on the Pine Street corridor.

My family owned three prcperties of the parcel since 1929, where the family business served the San Francisco Bay Area. Enclosed is an article written about the business, which respects its history and contribution. My father, uncle and grandfather have passed away and selling the business was certainly inevitable. I reviewed the prospective plans for the entire site and tears came to my eyes. You and the architect firm of Kwan Henmi preserved the spirit and beauty of the old brick buildings. I cannot tell you how much that means to my family.

B.4.1

Deovlet and Sons furniture store supported the Japanese community durirg the time of the internment camps, in the 1940's, by storing their belongings during such an unfortunate time. There are countless stories about the history of the 1600 block of Pine Street. I have some old pictures you may be interested in seeing.

I thoroughly support your plans of development and deeply respect your preserving the history of my family's lineage and history of San Francisco.

With deepest respect,
Roberta Wackler
(daughter of Robert Deovlet,
past owner of Deovlet and Sons).

1262 Pine Street
San Francisco, CA 94109
415-307-5024
rwackler@comcast.net

'THE FRIENDLY FURNITURE FOLKS'

New Fillmore
Dec. 2007

A Family Name Fades Away

For 67 years, Pops Deovlet and Sons furnished the neighborhood

By Joe Beyer

It won't be long now before the fading neon sign proclaiming Deovlet and Sons Furniture on the shuttered storefront at 1660 Pine Street gives way to the wrecking ball and a pair of condominium towers begins to rise.

But for 67 years, Deovlet and Sons — known as "the Friendly Furniture Folks" — served thousands of neighborhood residents from its one and only location between Van Ness Avenue and Franklin Street.

■

Benjamin "Pops" Deovlet and his two sons, Philip and Robert, opened the furniture store in 1938. Pops died in 1972. But the sons continued to operate the business until they were well into their 80s. The cost of seismically strengthening the brick buildings finally forced them to close the store in November 2005.

According to Robert Deovlet's daughter, Roberta Wackler, the family bought the original building in 1929 for $19,000 — not to sell furniture, but to sell dried fruit.

The fruit was shipped in from Fresno and dried in the building with the help of a furnace installed on the third floor. It was packed into wooded crates and shipped all over the country and abroad. As the rising cost of fruit made their business less profitable, the family decided to try something new.

Pops and his two sons opened the Yellow Pages to "fruit" and found that "furniture" was the next alphabetical listing. And so they decided to go into the furniture business.

Deovlet and Sons Furniture served generations of San Franciscans and others throughout the Bay Area. The Deovlets supplied appliances for many homes and apartment buildings in the neighborhood, with free

Robert (center) and Philip Deovlet show a new dishwasher in the 1970s. Appliances from their store are in many neighborhood homes and apartments.

delivery, negotiable prices and, as promised, friendly service. For all of the 67 years they ran the store, Phil and Bob Deovlet were the only salesmen. They also did the accounting and billing, all on handwritten records.

Phil said shortly before the store closed that Bob at one point had wanted to retire, but Phil talked him out of it by saying, "If you retire you will die."

■

Pops Deovlet immigrated from Armenia in 1908 and initially settled in Fresno's Armenian farming community. In 1914 he married Rose Mahdesian, who had immigrated from Armenia in 1904. Sons Philip and Robert were born in Fresno.

After moving to San Francisco, the family joined the Bethel Armenian Presbyterian Church, which met in the Victorian at 2409 Washington Street, now a Seventh Day Adventist Church. When that church closed in 1957, the entire Deovlet family joined Calvary Presbyterian Church, sometimes filling three pews in the balcony on Sunday mornings. Phil was ordained as a deacon in 1958, "Pops" Benjamin Deovlet was ordained as an elder in 1960, and Robert was ordained as a deacon in 1969 and as an elder in 1976.

■

The sons had attended nearby Redding Elementary School and Galileo High School, where they had many friends in the Japanese-American community. The association continued when they entered the business world. The Deovlets advertised solely in the *Nichi Bei Times*.

In 1942, when their Japanese-American neighbors were ordered to internment camps, some trusted the family so completely they asked them to store their personal belongings. The Deovlets agreed, keeping the items in locked compartments on the third floor of their building. After the war, when the Japanese-Americans returned, all items stored were safely retrieved.

This service to the Japanese-American community was recognized during a Day of Remembrance candle lighting ceremony in 2003. According to Hiroshi Shimizu, a master of ceremony at the service, Phil and Bob Deovlet were honored guests. Bob was invited to light one of the 11 giant candles that symbolized each of the internment camps.

Philip Deovlet died in July 2006 at age 91. Robert died earlier this month, also at 91. A memorial service will be held at Calvary Presbyterian Church on Saturday, November 8, at 1 p.m.

Robert Deovlet demonstrates for a customer the latest in stoves in the early years of Deovlet and Sons, located from 1938 to November 2005 at 1660 Pine Street.

From: Sue Vaughan [mailto:susan.e.vaughan@sonic.net]
Sent: Wednesday, October 30, 2013 10:55 PM
To: Jones, Sarah
Cc: Becky Evans; Arthur Feinstein; Karen Babbitt; Linda Weiner; Michelle Myers
Subject: 1634-1690 Pine Street Project; Planning Department Case No. 2011.1306E

Dear Sarah,

Please see that attached letter, also below.
Hope you are well.

Sue Vaughan

San Francisco Group
October 30, 2013

Please respond to:
Susan Vaughan
2120 Clement Street, Apartment 10
San Francisco, CA 94121

Re: Planning Department Case No. 2011.1306E

To: Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103

Dear Ms. Jones:

The Sierra Club believes the project proposed for 1634-1690 Pine Street, near Van Ness Avenue, has an excessive amount of parking. Project sponsors propose a 130-foot residential building with 262 residential units, 245 parking spaces, and 91 bicycle parking spaces. While the 245 parking spaces amount to less than one parking space per unit, the SC believes it is still too much.

B.5.1

The project at 1634-1690 Pine Street is less than one block from Van Ness Avenue, where the 47 Van Ness and 49 Van Ness-Mission operate. It is one and a half blocks from the 19 Polk, two blocks from the 1 California inbound, three blocks from the 1 California outbound, and two blocks from the 2 Clement. It is also close to the 27 Bryant and the 38 Geary. This location has a walkability score of 98 percent, a transit score of 94 percent, and bicycle score of 80 percent, according the realtor website, Walk Score. Van Ness BRT, when it is launched in a few years, should enhance the transit score of this neighborhood.

Page S-34 of the draft environmental impact report says, "The proposed project would cause a substantial increase in traffic that would cause the level of service at the intersection of Van Ness Avenue/Pine Street to decline from LOS D to LOS E in the AM peak hour and from LOS E to F in the PM peak hour," and would pose a significant and unavoidable impact after mitigation.

B.5.2

In addition, the growing number of vehicles in San Francisco exacerbates air pollution. Studies just released from the World Health Organization have now classified air pollution as a whole as carcinogenic to humans, with the International Agency for Research on Cancer data indicating a strong connection, not only to lung cancer, but bladder cancer, adding to the list of diseases including heart disease and asthma.

The increase in the number of vehicles in the neighborhood throughout the day – but especially during the morning and evening rush hours – will endanger people living in that area, particularly children, whose lungs are still developing, and the elderly and those who already have weakened hearts and lungs. While all the vehicles may be compliant with air quality standards, but the cumulative risk of so many additional vehicles in one neighborhood is unacceptable and presents a risk to those people exposed in that neighborhood.

B.5.2

The Sierra Club strongly supports the unimpeded flow of mass transit and the safe passage of bicyclists and pedestrians as some of the best methods for combatting air pollution and climate change. The SC urges the project sponsor and the SF Planning Department to work together to lower the planned amount of parking.
Sincerely,
Susan Vaughan, SF Group Secretary
Linda Weiner, SF Group Executive Committee

--
Sue Vaughan
(415) 668-3119
(415) 601-9297

San Francisco Group
October 30, 2013

Please respond to:
Susan Vaughan
2120 Clement Street, Apartment 10
San Francisco, CA 94121

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To: Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103

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Sincerely,
Susan Vaughan, SF Group Secretary
Linda Weiner, SF Group Executive Committee

From: Hella Cheitlin [mailto:hellac@comcast.net]
Sent: Sunday, November 03, 2013 11:11 AM
To: Jones, Sarah
Subject: 1634 Pine Street

We are residents at San Francisco Towers and we have some serious concerns about the proposed building at 1634 Pine Street:

1. It seems that there will be no pull-in for delivery vehicles (moving trucks, Fed Ex, etc.), which will be parked so that they will block off the right lane of Pine Street, causing traffic congestion on a busy street. B.6.1

2. How often will the trash be collected and what kind of containers will be used? Where will these containers be stored before they are rolled out to the curb? Trash containers on the sidewalk are both unsightly, unhealthy and obstructive. B.6.2

3. Since there will be no place for people to park while waiting to pick up residents, cars will have to be driving around the block, which will put extra traffic on Franklin, California and Van Ness. B.6.3

4. There may be backups of cars trying to get into the parking garage, which means that cars waiting enter will block the sidewalk, making it dangerous for pedestrians, as well as protruding out into Pine Street, blocking traffic. B.6.4

5. The highrise will produce gusts of wind which are a danger to people with canes and walkers or elderly pedestrians walking on the sidewalk. B.6.5

Thank you for your giving serious consideration to our concerns.

Hella and Melvin Cheitlin
1661 Pine Street #1145
San Francisco, CA 94109

Voicemail received 11/5/13

My name is Steven Kushner. We are neighbors of the Pine/Franklin project. 292-5554.

My concern is the three beautiful really old trees that go up Franklin Street. When I look at the design pictures of what I imagine will be a 13- or 14-story building, I do not see those trees being accommodated, and they really should be. .. I'm concerned about the fate of those three trees, and they really should be accommodated.

B.7.1

Called him back 11/5/13 and spoke with him. He lives at 1557 Franklin St. He also expressed concerns about more traffic and said there was a horrendous accident at Gough a month ago.

From: GDADAMS39@aol.com [mailto:GDADAMS39@aol.com]
Sent: Wednesday, November 06, 2013 12:25 PM
To: Jones, Sarah
Subject: DEIR 1634 Pine Street

This Draft Environmental Impact Report needs further clarification and plainer, less technical language to explain impacts regarding wind and traffic. B.8.1

As to wind, past city experience recalls that high buildings tend to deflect winds downward onto pedestrians unless the building's architecture buffers and deflects the winds upward. Is that the case regarding the Franklin Street sidewalk outside 1634 Pine Street? The DEIRs language should explain in non-technical language how wind effects there fail to constitute a problem. B.8.2

Regarding traffic impacts along Pine Street: The DEIR should explain why the development lacks an on-site driveway or porte-cochere for serving passenger, freight, furniture moving, garbage pickup and the project's retail businesses.. Regarding curbside alternatives, to what extent would traffic be backed-up? How many times must cars be forced to circle the block in the event of a backup? Can rush-hour traffic impacts be forecast? At rush-hour might the developer have to restrict use of curb space parking in order to expedite traffic? B.8.3

Gerald D. Adams
1661 Pine St., Apt. 1028
San Francisco CA 94109-0412

From: Poling, Jeanie <jeanie.poling@sfgov.org>
Sent: Wednesday, November 13, 2013 10:11 AM
To: Paul Stephenson
Cc: dean@oysterdev.com; Junius, Andrew (ajunius@reubenlaw.com)
Subject: FW: Neighborhood comments about Pine and Franklin 13 story tower project

From: Michael Disend [mailto:michael@powerhypnosis.com]
Sent: Wednesday, November 13, 2013 10:01 AM
To: Poling, Jeanie
Subject: Neighborhood comments about Pine and Franklin 13 story tower project

Dear Ms. Poling,

I'm writing to formally and passionately object to the proposed 13 story tower development on Pine and Franklin. With utmost sincerity I urge the planning commission to request a new and far smaller version of the project before — if ever — granting approval.

As a resident on Pine Street between Franklin and Gough since 1997 I have witnessed this once calm and lovely NEIGHBORHOOD turn into a cold, jam packed extension of a super highway. I reminded the board when I spoke before them recently of the 16 year old boy who was killed by a car racing up Pine Street at speeds exceding 85 mph. It was around 7 am several weeks ago when the car hit the vehicle he was in. It sounded like a bomb going off. I rushed outside and saw his body in the street. It was horrifying to all of us in the building because it represents in a tragic way how much insane traffic there is now on Pine, Franklin, and Gough throughout the day. The roaring noise is ceaseless, the stream of cars, buses, and trucks seemingly endless.

B.9.1

Yet the proposed Pine/Franklin project in its EIR proposes 245 more parking spaces for resident vehicles! That's crazy. That's madness. Across the street is an assisted living facility filled with frail seniors who walk to Whole Foods and have to now already tread carefully through the mad traffic jam. Plus the garage entrances are not set back sufficiently, if at all. Clearly, other automobile fatalities and injuries can or will happen. It's just a matter of time. Also, the noise level will be unendurable. for all of us residents, especially seniors.

THIRTEEN STORIES?!! Two towers!? The time required for the demolition and construction will only cause huge misery. This isn't "construction". It's DESTRUCTION of neighborhood residents, neighborhood history, and our lives. It's an assault on our peace, our quiet, our right to live in someplace quiet and peaceful, not a crazy zoo of construction sites in every direction.

B.9.2

I must mention that already, on Bush and Franklin, one block over, another huge condo tower is being erected now. One block over from that site near Geary the demolition for yet another tower started several days ago, across from the Unitarian church. Plus, and this is GIGANTIC, the Cathedral Hill hospital project demolition is scheduled to start within a few days. And, I must add, another enormous condo housing project between Van Ness and Polk, already at the height limitations, is scheduled to begin early next year, June at the latest we're told.

B.9.3

This is way, way, way too much for us who have lived here and been productive San Franciscans. Our lives are literally being destroyed by the constant noise and supposed "construction" which benefits only a small percentage of the population.

You may dismiss my words and be proud of the thousands of building permits handed out to those "interests" who now control San Francisco, and your concern for better SF economics may be sincere. But, rest assured, "construction" everywhere, plus the street work EVERYWHERE, has turned this once lovely, beautiful, sweet city into a swarming noisy hive which more and more resembles Hong Kong: nothing but high rise tower after high rise tower. Cold, Sterile. Noisy. Packed. All the lovely, rare character that set San Francisco apart is being destroyed at a breakneck pace.

B.9.4

Worst of all, the voices of "real" San Franciscans are being utterly ignored. This is not what WE want to happen to San Francisco. What is written here is being expressed throughout the city.

I ask that you, the SF planning commission, send Pine and Franklin project back to the drawing board and not give the go-ahead for it to begin until those of us who live here have a chance to recuperate and breathe freely again.

B.9.5

Because, as it is now, this once lovely NEIGHBORHOOD has turned into a near nightmare for residents.

Thank you for your attention.

Best,
Michael Disend
415.440.8767

1777 Pine Street #201
San Francisco, CA 94109

From: Michael Disend [mailto:michael@powerhypnosis.com]
Sent: Wednesday, November 13, 2013 10:04 AM
To: Poling, Jeanie
Subject: Comment about Pine and Franklin Proposed Development

Dear Ms. Poling,

I'm writing to formally and passionately object to the proposed 13 story tower development on Pine and Franklin. With utmost sincerity I urge the planning commission to request a new and far smaller version of the project before — if ever — granting approval.

As a resident on Pine Street between Franklin and Gough since 1997 I have witnessed this once calm and lovely NEIGHBORHOOD turn into a cold, jam packed extension of a super highway. I reminded the board when I verbally spoke on November 13 of the 16 year old boy who was killed by a car racing up Pine Street at speeds exceding 85 mph. It was around 7 am when the car hit the vehicle he was in. It sounded like a bomb going off. I rushed outside and saw his body in the street. It was horrifying to all of us in the building because it represents in a tragic way how much insane traffic there is now on Pine, Franklin, and Gough throughout the day. The roaring noise is ceaseless, the cars, buses, and trucks seemingly endless. B.10.1

Yet the proposed Pine/Franklin project in its EIR proposes over 200 more parking spaces for resident vehicles! That's crazy. That's madness. Across the street is an assisted living facility filled with frail seniors who walk to Whole Foods and have to now already tread carefully through the mad traffic jam. Plus the garage entrances are not set back sufficiently, if at all. Clearly, other automobile fatalities and injuries can or will happen. It's just a matter of time. Also, the noise level will be unendurable. for all of us residents, especially seniors.

THIRTEEN STORIES?!! Two towers!? The time required for the demolition and construction will only cause huge misery. This isn't "construction". It's DESTRUCTION of neighborhood residents, neighborhood history, and our lives. It's an assault on our peace, our quiet, our right to live in someplace that's not the equivalent of a war zone, not a crazy zoo of construction sites in every direction. B.10.2

I must mention that already, on Bush and Franklin, one block over, another huge condo tower is being erected now. One block over from that site near Geary the demolition for yet another tower started several days ago, across from the Unitarian church. Plus, and this is GIGANTIC, the Cathedral Hill hospital project demolition is scheduled to start within a few days. And, I must add, another enormous condo housing project between Van Ness and Polk, already at the height limitations, is scheduled to begin early next year, June at the latest we're told. B.10.3

This is way, way, way too much for us who have lived here and been productive San Franciscans. Our lives are literally being destroyed by the constant noise and supposed "construction" which benefits only a small percentage of the population.

You may dismiss my words and be proud of the thousands of building permits handed out to those "interests" who now control San Francisco, and your concern for better SF economics may be sincere. But, rest assured, "construction" everywhere, plus the street work EVERYWHERE, has turned this once lovely, beautiful, sweet city into a swarming noisy hive which more and more resembles Hong Kong: nothing but high rise tower after high rise tower. Cold, Sterile. Noisy. Packed. All the character that set San Francisco apart is being destroyed at a breakneck pace. B.10.4

Worst of all, the voices of "real" San Franciscans are being utterly ignored. This is not what WE want to happen to San Francisco. What is written here is being expressed throughout the city. B.10.4

I ask that you, the SF planning commission, send Pine and Franklin project back to the drawing board and not give the go-ahead for it to begin until those of us who live here have a chance to recuperate and breathe freely again. B.10.5

Because, as it is now, this once lovely NEIGHBORHOOD has turned into a near nightmare for residents.

Thank you for your attention.

Best,
Michael Disend
415.440.8767

1777 Pine Street #201
San Francisco, CA 94109

Marlayne Morgan <marlayne16@gmail.com>

November 17, 2013

To: President Rodney Fong, SF Planning Commission

Re: 2011.1306E DEIR

Dear President Fong and Commissioners:

The Evans Company, the previous project sponsor for 1634-1690 Pine Street, had previously proposed to build a 238 unit condominium project, exceeding both height and bulk limitations for the area and creating significant negative environmental impacts for this neighborhood. After the Evans Company declared bankruptcy, the site remained vacant for a number of years, and neighbors were encouraged to hear that the new sponsor would be submitting a project which did not require significant variances and would enhance the character of this and surrounding blocks.

B.11.1

Oyster Developments, the current project sponsor, is now proposing to construct a 262 unit, mixed use project. While nominally within heights limits, this box-like structure will also have significant negative impacts on this block of Pine Street, and in addition will generate 242 parking places, more than the original proposal if both are tied to one to one parking ratios.

Consistent with our long standing concern with the scale of this proposed project. we find the new project sponsor is attempting to crowd too many units onto too small a site, rather than designing a building which blends into the surrounding blocks and allows space for light and air to permeate onto Pine Street. Therefore, the ***Cathedral Hill Neighbors Association*** is urging the Commission to support **Alternative C, the Full Preservation Alternative.**

B.11.2

In addition to an attractive concept of varying heights and set backs for new and preserved structures on this site, **Alternative C** will provide 100 new residential units and 40 parking places, would meet all of the project sponsor's goals and establish a desirable new project in the neighborhood.

We urge you to support **Alternative C.**

Regards,

Marlayne Morgan
Cathedral Hill Neighbors Association

c. John Rahaim

From: Paul Wermer [mailto:pw-sc_paul@sonic.net]
Sent: Sunday, November 17, 2013 7:19 PM
To: Jones, Sarah
Cc: Rahaim, John; Rich Hillis; Hisashi Sugaya; Ionin, Jonas; Cindy Wu; Michael J. Antonini; Gwyneth Borden; Kathrin Moore; planning@rodneyfong.com; Mike Buhler
Subject: DEIR Comments Case No. 2011.1306E

Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103
Sarah.B.Jones@sfgov.org

Via e-mail Only

17 November 2013

Subject: DEIR Comments Case No. 2011.1306E, 1634–1690 Pine Street Project

Dear Ms. Jones:

I am submitting the following comments that express my concerns about the adequacy, accuracy and completeness of the DEIR for the proposed 1634 Pine Street project.

1) Comments on the Initial Study:

The initial study determines incorrectly that the proposed project would have "less than significant impact" on several CEQA criteria, in some cases using misleading photographs or ignoring SF Planning Department prior reports in reaching those conclusions.

Specific Comments:
A) p.287 of the pdf, p32 of the Initial Study: Impact LU3 - The report concludes that there would be a Less than significant impact on the character of the neighborhood.
Figure 18 abuses perspective and uses a misleading wide angle photo-rendering, thus misrepresenting what a person at the corner would see, and artificially diminishing the visual impact.
Figure 22 looking W along Pine is taken from an angle such that it does not represent the view driver in center would see or the view of pedestrian on N sidewalk. The photo's angle is not directly along the axis of Pine St. Both of these photo-renderings misrepresent what would be a new urban canyon should the project be approved as proposed.

B.12.1

Similarly, the proposed building does not step down to the West - thus creating yet another new building with an abrupt transition from the heights E of Franklin to the building heights W of Franklin. Repeating the mistake of the massing of the San Francisco Towers to the S of the proposed project does not respect the existing neighborhood character.

The proximity to the San Francisco Towers creates an urban canyon,with building heights approaching twice the street (with sidewalks) width (roughly 70 ft) adversely affecting the existing human scale of the neighborhood, and significantly changing the view corridor that exists along the Pine Street axis. Concluding that this is a less than significant impact to neighborhood character ignores the reality, a task made easier by the misleading photo renderings that intentionally use angles and perspective to minimize the visual impacts.

B.12.1

B) page 303 of the pdf, Initial study, p. 4: Impact C-PH-1 - concludes that this would "... result in less than significant cumulative impacts on population and housing." Yet this project proposes 262 units of market rate housing. This conclusion ignores prior Planning Dept studies on the demand for low/moderate income housing created by adding market rate housing. The DEIR fails to analyze if this project provides adequate onsite BMR units to accommodate that moderate income demand increase. What is the forecast demand for low/moderate housing incurred per 100 units of market rate housing, and does that justify a "less than significant" conclusion?

B.12.2

C) page 308 of the pdf, initial study p. 53: Impact TR-2 falsely assumes that only roadway engineering introduces risks. This ignores the frequently observed behavioral changes in frustrated drivers that increase high risk driving actions. Congestion and obstructions resulting from inadequate driveway and visitor drop-off design need to be evaluated in light of TR-2.

B.12.3

2) Comments on the DEIR:

A) p.25 of the pdf: The DEIR accepts the complete demolition of 2 of the 5 facades that comprise the historic Pine Street Auto Row. The loss of the context established by the 5 historical adjacent structures that reflect the original use should be avoided. Unfortunately, the proposed mitigations do not consider that, nor do any of the DEIR alternatives seriously consider that option. M-CP-4d would be far more effective if the historic sequence of facades was preserved, rather than destroyed by removing 2/5 of the facades. This would better communicate the scale both of the buildings and the enterprises that were critical to San Francisco's development in the early 20th century, as well as the significance of the automobile on the development of the city and it's roadways (such as Van Ness). The DEIR is inadequate in that it fails to consider serious alternatives to preserve the full 5 facades. It is important to respect the fact that the historical importance derives from story told by the historic building, not the mere facades in themselves. To accurately tell the story, all facades are needed.

B.12.4

B) p.29 of the pdf: TR-2 ignores the problem of transient back-ups at peak traffic periods - 3 minutes is a long period in commute traffic. The code definition does not reflect actual impact on dangerous traffic conditions/behaviors. Additionally, this fails to address the issue of space for passenger pick-up and drop-off. On-street passenger loading zones (white curbs) are nice in concept, but in fact rarely work in practice. While we may have laws regarding these common traffic issues, they are so rarely enforced as to be worthless at modifying problem behaviors, and hiding behind a facile "we don't need to do anything, because it is already prohibited" ignores the fact that, in spite of violating various codes, bad traffic behaviors are common - unless alternative actions, such as off-street drop-offs, are promoted.

B.12.5

C) p. 32 of the pdf: The proposed mitigation M-C-TR- 1 does not deal with traffic. Exactions for BRT infrastructure does not mitigate traffic impact of the project, and should not pretend to do so.

B.12.6

D) p. 126 and p 149 of the pdf: It does not appear that the traffic study as described on IV.B-6 and IV.B-29ff comprehended changes in driver behavior to be expected if the Van Ness BRT project prohibits most left turns from Van Ness. To what extent might that increase traffic at the Van Ness intersections? It is reasonable to expect that drivers making a series of right turns instead of a left would increase traffic at the Van Ness intersections, yet this is not discussed as a possible interaction aggravating future problems.

B.12.7

E) p. 129 of the pdf: The quality of the Transit Capacity is questionable. Based on the stated headways and capacities on the 1, 2/3, 38/38L, and 47/49 screenlines, I should only rarely wait for more than 5, 15, 6 and 10 minutes respectively. Similarly, there should be ample capacity for me to board a bus, even at peak periods. The reality is very different. Waits can be much longer, and the buses frequently are too full to accommodate additional passengers. The baseline data analysis and assumptions do not accurately describe the reality, and so mislead the decision makers as to the actual impact on transit.

B.12.8

The items identified above are deficiencies and inaccuracies that need to be addressed for the final EIR.

Sincerely yours,
Paul

--
Paul Wermer
2309 California Street
San Francisco, CA 94115

+1 415 929 1680
paul@pw-sc.com

SF HERITAGE www.sfheritage.org 2007 FRANKLIN STREET SAN FRANCISCO, CA 94109 415 441 3000

November 18, 2013

Submitted by email
Sarah B. Jones
Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103
Email: sarah.b.jones@sfgov.org

RE: DEIR for 1634-1690 Pine Street Project (Case No. 2011.1306E)

Dear Ms. Jones,

On behalf of San Francisco Heritage (Heritage), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 1634-1690 Pine Street project. Our comments focus on the adequacy and accuracy of the DEIR in evaluating potential impacts on cultural resources and in considering potentially feasible project alternatives that would reduce or avoid those impacts.

Heritage strongly objects to the proposed treatment of historic resources under the proposed project. The vast majority of the eligible Pine Street Auto Shops Historic District would be demolished and new construction would completely overwhelm the remnants to be retained, with virtually no setback to separate new construction from the historic facades. We agree with the Planning Department's determination that the project would result in significant adverse impacts to cultural resources, including substantial demolition of all five contributors to the Pine Street Auto Shops Historic District, two of which are also eligible for individual listing in the California Register of Historic Resources (CRHR). Furthermore, we agree with the Planning Department that implementation of proposed mitigation measures would not adequately compensate for the loss of cultural resources.

B.13.1

Located within the Van Ness Auto Row corridor, the five historic buildings targeted for removal help tell the story of one of the most influential automobile industry centers on the west coast in the 1910s-1920s. Many of the automobile distribution centers that operated along Van Ness Auto Row, in fact, partnered with local dealerships throughout California in order to service their wide customer base. In the years following the 1906 Earthquake and Fire, auto-related businesses moved to Van Ness Avenue and the surrounding blocks to take advantage of the ample space available to build large showrooms. The spacious showrooms of the era were

often built in high-style architecture and served as the primary focus of the burgeoning Van Ness Auto Row. Other auto-related businesses followed the dealerships to the area in hopes of profiting from the new customer base in need of supplies, parts, tires, paint, repair services, and parking. In total, over 200 auto-related buildings were constructed on or near Van Ness Avenue between Market Street and Pacific Avenue during the 1910s.

The project site encompasses the entire Pine Street Auto Shops Historic District, identified by William Kostura in the City's 2010 survey of Van Ness Auto Row support structures. The Pine Street Auto Shops Historic District is "the only example that comprises more than two auto-related buildings from the 1910s standing adjacent to one another in or near the Van Ness Avenue Auto Row corridor." Historically, the five buildings housed auto-related enterprises, ranging from an automobile showroom to specialty service shops. The survey report concluded that the Pine Street Auto Shops Historic District is eligible under CRHR Criteria 1 (Events) and 3 (Architecture) within the context of the Van Ness Auto Row support structures. Heritage agrees with the Planning Department's findings that the proposed project would result in the *de facto* demolition of the Pine Street Auto Shops Historic District.

B.13.1

While the DEIR accurately describes the project's impacts, it fails to consider a reasonable range of potentially feasible alternatives that would meaningfully reduce impacts on cultural resources and achieve most of the project objectives. CEQA Guidelines require a range of alternatives to be considered in the EIR, with an emphasis on options capable of "substantially lessening" significant adverse environmental impacts while achieving most of the stated project objectives.

The DEIR for the 1634-1690 Pine Street Project fails to evaluate a single alternative that would retain the eligibility of the historic district and achieve a majority of project objectives. We urge the Planning Department to craft an alternative that allows for greater preservation of identified historic buildings, while more closely approximating the desired number of units in the project description. For example, the Department should modify the so-called "Full Preservation Alternative" by shifting more new construction and height onto the vacant lot adjacent to the historic buildings at the corner of Pine and Franklin. In describing the Full Preservation Alternative, the DEIR references Van Ness Avenue as the shared context and thereby limits the height of new residential towers to eight stories. As a result, this alternative falls far short of the desired number of units and is destined to be rejected as infeasible. We feel that the context should be adjusted to more accurately reflect prevailing development patterns in the immediate vicinity, especially the 13-story San Francisco Towers project directly across Pine Street. This would allow a taller, 13-story tower to be built at Pine and Franklin with more units, helping to alleviate pressure on the existing historic buildings and enabling greater retention of cultural resources, while enhancing the feasibility of the Full Preservation Alternative.

B.13.2

On behalf of San Francisco Heritage, thank you for the opportunity to comment on the DEIR for 1634-1690 Pine Street. Please do not hesitate to contact Heritage's preservation project manager, Desiree Smith, at dsmith@sfheritage.org or (415) 441-3000 x11 should you have any questions or need additional information.

Sincerely,

Mike Buhler
Executive Director

1865 Sacramento St., #6
San Francisco, CA 94109
HiGoNRG@cs.com

November 18, 2013

Sarah B. Jones
Jeanie Poling
Planning Department, City & County of San Francisco
Environmental Planning Division
1650 Mission St., Suite 400
San Francisco, CA 94103

Re: Case No. 2011.1306E
1634-1690 Pine Street

Dear Ms. Jones and Ms. Poling:

Below, my comments on the Draft EIR issued for the destruction of the Pine Street Auto Shops and subsequent construction project of two 13-story commercial and for sale condominium towers proposed for Pine Street between Van Ness and Franklin ("the project").

I have lived and worked in the general vicinity of the project since 1991. I worked in the Edward Coleman House at 1701 Franklin and California Streets for over 12 years. Our family has lived at 1865 Sacramento Street since 2007, and our unit has a direct view of the proposed project area. The previous 12 years we lived in a 3 bedroom flat as renters on Nob Hill before being evicted via the Ellis Act.

In general I will only comment on portions of the DEIR which I find have not fully addressed impacts (nor the mitigation thereof) that I believe will occur based on my perspectives as a denizen of the neighborhood for close to 25 years.

Affordable Housing On-Site

The DEIR does not address whether or not the project sponsors will address the affordable housing requirement by making 12-15% of their project into affordable, below market units, or if they will follow the more common course of either donating to the affordable housing fund or building affordable housing in a distant neighborhood themselves. Doing the latter would result in a different group of impacts as the neighborhood would have to accommodate a larger, wealthier group of residents and their multiple larger vehicles, greater use of resources, and increased traffic from the delivery services urban wealthy people tend to exploit.

B.14.1

CP-4 – Loss of Historic Architectural Resources

The DEIR proposes to mitigate the loss of the historic Pine Street Auto Shops by preserving only the facades of those 4 contiguous buildings. However, despite a 10 year period of neglect and vandalism of the buildings, they also still contain now-rare mid-century commercial interiors, including graceful, well-appointed sales floors, interior open stairways to more richly appointed upstairs office spaces, and back-office spaces with similar rich decoration indicative of public commerce and sales spaces. (A similar interior space, designed and evocative of the Art Deco 1920's, was forever lost when the Ellis Brooks Chevrolet showroom on Van Ness became a stripped down Nissan dealership.)

B.14.2

M-CP-4d indicates "permanent interpretive exhibits" on the property, but does not specify their form, location or size. Will they be small lobby display cases, a plaque on the outside of the building, some paper leaflets available to peruse, etc.? They will be installed at a "pedestrian-friendly location" but owing to the project's traffic, wind and shadow impacts, it is not clear where or even if such a location will ever exist.

In general the mitigation measures taken with regard to the great loss of the century-old last 4 remaining contiguous buildings of San Francisco's historic Auto Row are simply a cosmetic paper trail excusing their destruction. The analysis of the Full Preservation Alternative in this area is perfunctory and inconclusive, when it is the only way to non *de facto* demolition. It is inexcusable and cynical to merely preserve the facades of these workaday San Francisco spaces. Reading about history or even sharing digital files about it in no way mitigates the loss and wasteful destruction of these evocative structures.

B.14.2

Transportation and Circulation Impacts

TR-1 through 9

TR-1 only mentions the project's traffic impacts on the intersection of Van Ness and Pine Streets, when this intersection contributes to congestion down an extended stretch of the downtown exit corridor with hours of weekday evening bumper-to-bumper traffic. 248 vehicles using the proposed garage daily and moving through the intersection of Pine and Van Ness will congest many other nearby intersections.

B.14.3

The DEIR does not mention potential impacts of the Van Ness BRT project, but rather only assumes that this highly-criticized project will lessen traffic on Van Ness. Since the BRT project reduces capacity by up to 33% in certain areas, its effect on congestion conditions could easily be just the opposite. Increased traffic on Franklin and Gough streets from the shift of traffic from Van Ness, preventing Pine Street traffic from accessing these north-south routes, contributes to the greater traffic congestion menace on Pine Street itself in front of the project and requiring greater mitigation there. The DEIR does not include in its data impacts from the 13 story residential tower proposed for 1545 Pine Street and the CPMC project at Van Ness and Post. The DEIR does not indicate whether the methodology used for determining 2035 cumulative impacts considered any impacts from a 20 year "infill growth and development" program for the surrounding area with other projects comparable in size and scale to the current proposed project.

B.14.4

Traffic and pedestrian hazards are created by the project's large bulk and the plan to fully "build-out" the corner of Pine and Franklin. The resulting dark minimally sized sidewalk at the foot of a 130 foot tall wall impacts sightlines for both Pine Street and Franklin Street motorists and pedestrians traversing the intersection. This condition is not identified nor illustrated in the DEIR and no mitigation measures are proposed.

B.14.5

TR-3 and 4 ignore completely the potential impact resulting from the use of private luxury shuttle buses (aka "Googlebuses") along Van Ness Avenue which already cause heavy impacts by using the corner of Van Ness and Pine as a stop. Impacts for up to 20% of the residents and owners in the project utilizing private shuttle buses should be considered. This could result in an additional shuttle bus using Van Ness and stopping on Van Ness every 10-12 minutes. (Private shuttle buses frequently have reduced capacities as every other row of seats is taken out so tech commuters may have room to conference with each other,

B.14.6

stretch their legs, or accommodate their pets.) TR-4 also ignores the impact of these shuttle bus riders waiting in large groups on the sidewalk and interfering with pedestrian accessibility throughout the area. B.14.6

Similarly, TR-6 understates the potential use of the loading facilities in the project, ignoring the possibility that the purchasers of the project's market rate condos will utilize delivery services at a greater rate than existing average. Owing to the nature of their jobs, commute distance, and subsequent lack of personal time to shop and retrieve their own goods, condo owners may prefer instead to have goods delivered via trucks which will use and obstruct the limited loading zones for the project at higher than historically observed levels. B.14.7

TR-8 does not ponder the loss of parking now present in the so-called "vacant lot" which is used by the Church at Franklin and California for their Wednesday evening and Sunday morning services. The DEIR identifies a *daily* shortfall of 30 spaces for the entire project but claims this shortfall would be remedied by using nearby spaces, despite identifying current parking use in the surrounding area at steady 90 to 100% occupancy levels. The project itself would forever remove 4 parking spaces now available to be used by the general public. No mitigation is proposed for that effect. B.14.8

C-TR-1 through 4

MC - CTR1 only proposes to mitigate the project's impacts by making a contribution to the BRT improvement on the Van Ness/Pine intersection, when the project's impacts will clearly extend to a far greater area. CTR2 claims that the project would not contribute considerably to increase in transit ridership, but the DEIR only ponders increases during weekday rush hours. Riders of Van Ness MUNI lines know very well that these lines are often at their most crowded on weekends and off-hours when bus frequency drops significantly. Weekend functions on the northern waterfront result in heavy use of these MUNI lines by visitors seeking car-free access to the north up from BART and Market Street. B.14.9

Wind and Shadow Impacts

One of the DEIR's greatest shortcomings is its failure to recognize potential wind impacts of the project. Wind studies were not performed at many of the most likely heavily affected locations near the project. Two 130 foot walls built directly in the face of the wind when it comes sweeping in with a typical pattern would channel and bounce that wind over a wide area. No wind studies were done mid-block on pedestrian heavy California Street between Van Ness and Franklin, no wind studies done on either northwest or southwest California/Van Ness intersections or at the cable car terminus there which is frequently used by large tourist groups, none in mid-block Van Ness between California and Pine, none on either northeast or southeast corners at Pine and Van Ness. B.14.10

Wind speed and flows vary greatly in the area, and are at their greatest in summer months in the afternoon. The DEIR does not identify what time of year or day the studies modeled. The methodology of the wind studies is barely explained, except to indicate that a model of the project, presumably measuring 3 inches in height and 4 inches in length, was built for wind tunnel tests performed in Davis. Did the model also include a topographical model of the surrounding area, including the peak found at Lafayette Park, and the large wind-channeling buildings already extant nearby? How can such a tiny model identify wind impacts at street corner levels, where pedestrians would take the brunt of 30 mph gusts creating uncomfortable and hazardous conditions? The EIR needs to have credible evidence regarding this impact. B.14.11

The DEIR does not treat wind impacts seriously. A much greater effort needs to be done to protect pedestrians from serious and hazardous wind impacts which may be caused by the project. These are the kinds of impacts which clearly were NOT considered when both the Holiday Inn building and the massive San Francisco Towers buildings were approved. B.14.11

No shadow impacts were assessed by the DEIR. The project would appear to have shadow impacts along both Franklin and Van Ness, including the cable car terminus on in the middle of California, as well as other spots along California Street and its intersection with Van Ness. B.14.12

Land Use Planning Impacts

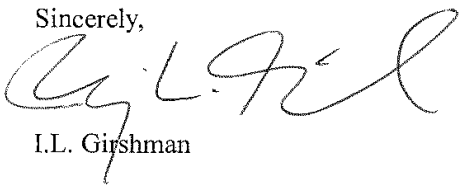
Section V of the DEIR is a cursory analysis of the impact of high-density growth (similar to the proposed project) will have on the immediate nearby 6 square block area, as well as the greater area of "downtown" San Francisco. It does not propose to mitigate any of the "quality of life" issues for denizens of the neighborhood, including wind, shadows, crowding, traffic volume, transportation congestion, etc. The effect of creating a dark, windswept "tunnel" on this block of Pine Street is unseen anywhere else in the city, except in the Financial District and South of Market, where wind impacts are not as severe owing to Nob Hill's sheltering effect from the predominantly northwest winds. Will this project lead to the creation of other "conditional use" bleak blocks, in the excuse of creating market-rate housing? The DEIR does not analyze this potential city-wide environmental impact. B.14.13

Illustrations and Figures

The DEIR falls short in providing illustrations and figures which would adequately convey the mass and bulk of the project. There is no massing diagram for the proposed project. Photo renderings do not display street level views of the shadow corridor created by the project on Pine Street between Van Ness and Franklin. Views of the backside of the project are not presented from street level. Users of the DEIR are not presented with a rendering which shows a common view of both sides of Pine Street and the "tunnel" created by two 13 story bulks facing each other. A view of the project to be seen by southbound Van Ness users on both sides of Van Ness is not presented. B.14.14

I look forward to seeing a Final Environmental Impact Report which will address the serious impacts the project will present and their potential mitigation, and provide serious and factual review materials for the Planning Commission's consideration of the project's proposed Conditional Use authorization.

Sincerely,



I.L. Girshman

From: Marlayne Morgan [mailto:marlayne16@gmail.com]
Sent: Monday, November 18, 2013 11:35 AM
To: sarah.jones@sfgov.org
Subject: Re: DEIR Comments Case No. 2011.1306E, 1634–1690 Pine Street Project

Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103
Sarah.B.Jones@sfgov.org

Via e-mail Only

November 18, 2013

Re: DEIR Comments Case No. 2011.1306E, 1634–1690 Pine Street Project

Dear Ms. Jones:

I am submitting the following comments that express my concerns about the adequacy, accuracy and completeness of the DEIR for the proposed 1634-1690 Pine Street project.

1) Comments on the Initial Study:

The initial study determines incorrectly that the proposed project would have "less than significant impact" on several CEQA criteria, in some cases using misleading photographs or ignoring SF Planning Department prior reports in reaching those conclusions.

Specific Comments:

A) p.287 of the pdf, p32 of the Initial Study: Impact LU3 - The report concludes that there would be a less than significant impact on the character of the neighborhood. Concluding that this is a less than significant impact to neighborhood character ignores the demolition or partial demolition of the Historic Auto Row buildings and replacing a layered landscape with a wall to wall glass box. B.15.1

B) page 303 of the pdf, Initial study, p. 4: Impact C-PH-1 - concludes that this would "... result in less than significant cumulative impacts on population and housing." This conclusion ignores prior Planning Dept studies on the demand for low/moderate income housing created by adding market rate housing. The DEIR fails to analyze if this project provides adequate onsite BMR units to accommodate that moderate income demand increase. B.15.2

2) Comments on the DEIR

A) p. 32 of the pdf: The proposed mitigation M-C-TR- 1 does not deal with traffic. Exactions for BRT infrastructure does not mitigate traffic impact of the project. B.15.3

B) p. 126 and p 149 of the pdf: It does not appear that the traffic study as described on IV.B-6 and IV.B-29ff comprehended increase of traffic on VanNess intersections if the Van Ness BRT project prohibits most left turns from Van Ness. It is reasonable to expect that drivers making a series of right turns instead of a left would increase traffic at the Van Ness intersections, yet this is not discussed as a possible interaction aggravating future problems. B.15.4

C) p. 129 of the pdf: The quality of the Transit Capacity is questionable, especially understating the impact on capacities on the 1, 2/3, 38/38L, and 47/49 once the CPMC Cathedral Hill campus is operational. The baseline data analysis and assumptions do not accurately describe the reality, and so mislead the decision makers as to the actual impact on transit. B.15.5

The items identified above are deficiencies and inaccuracies that need to be addressed for the final EIR.

Regards,

Marlayne Morgan
Cathedral Hill Neighbors Association

Jeanie Poling
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: 1634-1690 Pine Street, San Francisco Planning Department Case NO. 2004-0764E

SCH #: 2007042045

Dear Mz. Poling,

The undersigned represents Citizens Advocating Rational Development ("CARD"), a non-profit corporation dedicated to issues in development and growth.

This letter contains comments on the Draft Environmental Impact Report on the 1634-1690 Pine Street Project, in accordance with CEQA and the Notice of Completion and Availability. Please ensure that these comments are made a part of the public record.

ENERGY

The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the Project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical; the proposed project, which would have a total area of 353,360 gsf and would include approximately 262 new for-sale residential units totaling approximately 221,760 sf; 5,600 sf of commercial space, and 34,600 sf of subterranean parking with 245 parking spaces on one level, will devour copious quantities of electrical energy, as well as other forms of energy.

B.16.1

WATER SUPPLY

B.16.2

The EIR (or DEIR – the terms are used interchangeably herein) does not adequately address the issue of water supply, which in California, is a historical environmental problem of major proportions.

What the DEIR fails to do is:

1. Document wholesale water supplies;

2. Document Project demand;

3. Determine reasonably foreseeable development scenarios, both near-term and long-term;

4. Determine the water demands necessary to serve both near-term and long-term development and project build-out.

5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;

B.16.2

7. Identify the likely yields of future water from the identified sources;

8. Determine cumulative demands on the water supply system;

9. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;

10. Identify the environmental impacts of developing future sources of water; and

11. Identify mitigation measures for any significant environmental impacts of developing future water supplies.

12. Discuss the effect of global warming on water supplies.

There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future.

For the foregoing reasons, this EIR is fatally flawed.

AIR QUALITY/GREENHOUSE EMISSIONS/CLIMATE CHANGE

The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review

B.16.3

due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming.

This portion of the EIR fails for the following reasons:

1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others.

2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effects on river flows and ground water recharge. The impact thereof on the project's projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and global warming issues the short shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.

B.16.3

3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately.

4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the document and the EIR is totally deficient in this regard.

For the foregoing reasons, the EIR is fatally flawed.

ALTERNATIVE ANALYSIS

The alternative analysis fails in that the entire alternatives-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon.

B.16.4

Thank you for the opportunity to address these factors as they pertain to the referenced DEIR.

Very truly yours,

CITIZENS ADVOCATING RATIONAL DEVELOPMENT

NICK R. Green

President