

RESPONSES TO COMMENTS on the Draft Environmental Impact Report

Central SoMa Plan

PLANNING DEPARTMENT
CASE NO. **2011.1356E**

STATE CLEARINGHOUSE NO. 2013042070

SAN FRANCISCO PLANNING DEPARTMENT

Draft EIR Publication Date:	**DECEMBER 14, 2016**
Draft EIR Public Hearing Date:	**JANUARY 26, 2017**
Draft EIR Public Comment Period:	**DECEMBER 14, 2016–FEBRUARY 13, 2017**
Final EIR Certification Date:	**APRIL 12, 2018**

ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT

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TO: Members of the Planning Commission and Interested Parties

FROM: Elizabeth White, EIR Coordinator

Re: Attached Responses to Comments on Draft Environmental Impact Report: Case No. 2011.1356E for the Central SoMa Plan

Attached for your review please find a copy of the Responses to Comments (RTC) 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 April 12, 2018.** The Planning Commission will receive public testimony on the Final EIR certification at the April 12, 2018, hearing. Please note that the public review period for the Draft EIR ended on February 13, 2017; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

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

Please note that if you receive the RTC document in addition to the Draft EIR you technically have the Final EIR. If you have any questions concerning the RTC document or the environmental review process, please contact Elizabeth White at 415.575.6813 or elizabeth.white@sfgov.org.

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

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A. Introduction

A.1 Purpose of the Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (Draft EIR) for the proposed Central SoMa Plan, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resource Code Section 21091(d)(2)(A) and (B), the Planning Department has considered the comments received on the Draft EIR, has evaluated the issues raised, and is providing written responses that address each substantive environmental issue that has been raised by the commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. Such effects include physical impacts or changes attributable to the project and generally do not include social or financial implications of the project. Therefore, this document focuses primarily on responding to comments that relate to physical environmental issues, in compliance with CEQA.[1] In addition, this RTC document includes text changes to the Draft EIR initiated by Planning Department staff.

None of the comments received provide new information that warrant recirculation of the Draft EIR. The comments do not identify new significant impacts or a substantial increase in the severity of previously identified impacts, nor do they identify feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR and that the project sponsor has not agreed to implement.

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

A.2 Environmental Review Processes

Notice of Preparation and Public Scoping

The San Francisco Planning Department (Planning Department), as lead agency responsible for administering the environmental review of projects within the City and County of San Francisco under CEQA, published a Notice of Preparation (NOP) of an Environmental Impact Report and Public Scoping Meeting on April 24, 2013,

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

to inform agencies and the general public that the Draft EIR would be prepared based upon the criteria of State CEQA Guidelines Sections 15064 (Determining Significant Effect) and 15065 (Mandatory Findings of Significance). This notice was sent to applicable agencies and organizations, tenants of the project site, and addresses within a 300-foot radius of the project site.

Pursuant to CEQA Section 21083.9 and CEQA Guidelines Section 15206, a public scoping meeting to receive oral comments concerning the scope of the Draft EIR was held on May 15, 2013, at the Mendelsohn House, 737 Folsom Street, San Francisco, CA. Attendees were given the opportunity to provide oral and written comments.

Initial Study Public Review

The Planning Department considered the public comments received at the scoping meeting on May 15, 2013 and prepared an Initial Study in order to focus the scope of the EIR by assessing which of the Plan's environmental topics would not result in significant impacts on the environment. The Planning Department published the Initial Study on February 12, 2014. The Initial Study determined that the Plan could not result in significant environmental effects (in some cases, with mitigation identified in the Initial Study) for the following environmental topics: Population and Housing; Greenhouse Gas Emissions; Recreation; Utilities and Service Systems; Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality (except for potential impacts related to effects of combined sewer system operation on water quality and potential impacts of sea level rise, which are addressed in this EIR in Section IV.I, Hydrology and Water Quality); Hazardous Materials; Mineral and Energy Resources; and Agricultural Resources. As such, these environmental topics were scoped out of the EIR subsequently prepared. However, because the Initial Study analysis was based on a previous draft of the Plan circulated for review in 2013, the 2016 draft of the Plan was reviewed to ensure the Initial Study's conclusions reached on the 2013 draft remain valid. No new information related to the draft 2016 Plan emerged, as such no changes to the Initial Study's significance conclusions reached for the 11 topics that would be less than significant or less than significant with mitigation measures were required.

Draft EIR Public Review

The Planning Department published a Draft EIR for the proposed project on December 14, 2016, and circulated the Draft EIR to local, state, and federal agencies and to interested organizations and individuals for a 60-day public review period. Paper copies of the Draft EIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street, and Planning Information Counter, 1660 Mission Street, and (2) the San Francisco Main Library, 100 Larkin Street.[2] The Planning Department also distributed notices of availability (NOAs) of the Draft EIR; published the NOA in a newspaper of general circulation in San Francisco (*San Francisco Examiner*); posted the NOA at the San Francisco County Clerk's office; and posted NOAs at locations within the project area.

During the Draft EIR public review period, the Planning Department received 35 comment letters from public agencies, organizations, or individuals. RTC Attachment A, Draft EIR Comment Letters, includes copies of the comment letters submitted during the Draft EIR public review period.

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

During the public review period, the Planning Department conducted a public hearing to receive oral comments before the San Francisco Planning Commission on January 26, 2017, at San Francisco City Hall. A court reporter present at the public hearings transcribed the oral comments verbatim and prepared written transcripts (see Attachment B, Draft EIR Hearing Transcript).

Responses to Comments Document and Final EIR under CEQA

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

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

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

A.3 Document Organization

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

- **A. Introduction** – This section discusses the purpose of the RTC document, the environmental review processes, and the organization of the RTC document.
- **B. Revisions and Clarifications to the Proposed Project** – This section summarizes changes to the description of the proposed Plan, as described in Draft EIR Chapter 2, that the Planning Department

has initiated since publication of the Draft EIR. This section also analyzes whether these revisions to the Plan would result in any new or more severe significant environmental impacts not already discussed in the Draft EIR.

C. List of Persons Commenting – This section presents the names of persons who provided comments on the Draft EIR. The list is organized into the following groups: agencies, boards, and commissions; organizations; and individuals.

D. Comments and Responses – This section presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. Similar comments are grouped together by topic area. In the text of the comments, an ellipsis (…) standing alone as a separate paragraph indicates that one or more paragraphs in a comment are not included in the quoted text, either because those portions of the comment appear under another topic or because they do not address substantive issues with respect to the Draft EIR. Following each comment or group of comments on a topic are the City's responses.

E. Draft EIR Revisions – This section includes all of the changes to the Draft EIR text and graphics and cites the page number where the change is made to the text or graphics.

Attachment A – Draft EIR Comment Letters

Attachment B – Draft EIR Hearing Transcript

B. Revisions to the Proposed Plan

B.1 Introduction

Since publication of the Draft EIR, the Planning Department has made certain revisions to the proposed Plan as it was described in Chapter 2, Project Description. This RTC chapter describes these revisions and analyzes whether such revisions would result in any new significant environmental impacts not already discussed in the Draft EIR. Revisions and clarifications to the project description and, where applicable, the environmental impact analyses and mitigation measures, are presented in this section (deletions are shown in ~~strikethrough~~; new text is double-underlined). These revisions would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes increase the severity of any of the Plan's impacts identified in the Draft EIR. Mitigation measures identified in the Draft EIR would continue to be required in order to reduce or avoid significant environmental impacts. No new measures would be required to mitigate the significant impacts identified for the proposed Plan in the Draft EIR.

CEQA Guidelines Section 15088.5 requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the Draft EIR but before certification. The CEQA Guidelines states that information is "significant" if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." Section 15088.5 further defines "significant new information" that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, of a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines Section 15088.5(b) states that recirculation is not required if "new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

B.2 Revisions to the Proposed Plan

Evaluation of Central SoMa Planning Code Language for Consistency with the Central SoMa EIR Analysis

As part of the Central SoMa Plan, the Planning Department developed Planning Code language[3] that implements the objectives, policies, and implementation measures of the Central SoMa Plan. After publishing the Draft EIR, the Planning Department determined there were enough differences between the proposed controls in Central SoMa Plan Area and the Mixed Use Office (MUO) District outside of the Central SoMa Plan Area to warrant the creation of a new zoning district. This new zoning district, called Central SoMa Mixed Use Office (CMUO), is designed to encourage a mix of residential and non-residential uses, including office, retail,

[3] Central SoMa Plan Initiation Packet. II. Planning Code and Administrative Code Amendments – T Case. February 15, 2018, *http://commissions.sfplanning.org/cpcpackets/2011.1356MTZU.pdf*, accessed February 28, 2018.

light industrial, arts activities, nighttime entertainment, and tourist hotels. The CMUO controls are the same as for MUO, except as identified below:

- In the MUO, non-residential density limits are controlled by height, bulk, setback, open space controls, and floor-area ratio maximums; the CMUO would not have any floor-area ratio maximums.
- In the MUO there is not an in-lieu fee option for open space; in the CMUO there is an in-lieu option for residential towers that is set at a level to ensure that the City could build equivalent amounts of open space.
- In the MUO, hospitals are not permitted; in the CMUO they would be allowed with a Conditional Use authorization.
- In the MUO, residential care requires a Conditional Use authorization; in the CMUO it would be principally permitted.
- In the MUO, formula retail uses are principally permitted; in the CMUO they would require a Conditional Use authorization, except formula restaurants and bars, which would not be permitted.
- In the MUO, hotels of up to 75 rooms are permissible with a Conditional Use authorization on sites with a height limit below 105 feet, and hotels of any size are permissible with a Conditional Use authorization on sites with a height limit above 105 feet; in the CMUO hotels of any size are permitted with a Conditional Use authorization.
- In the MUO, movie theaters can only be up to three screens; in the CMUO there is no maximum on screens for movie theaters.
- In the MUO, residential parking is permitted up to one car for each four dwelling or Single Room Occupancy Units; up to 0.75 car for each dwelling unit is permissible with a Conditional Use authorization, subject to the criteria and conditions and procedures of Planning Code Section 151.1(e) or (f); and parking above these amounts is not permitted. In the CMUO residential parking is permitted up to one car for each two dwelling units; and not permitted above 0.50 car for each dwelling unit.
- In the MUO, office parking is allowed up to 7 percent of the occupied floor area of such uses and subject to the pricing conditions of Planning Code Section 155(g), and not permitted above; in the CMUO, office parking is permitted up to one car per 3,500 square feet of occupied floor area, and not permitted above this limit.

The proposed differences between CMUO and MUO zoning do not affect the analysis in the Central SoMa Draft EIR, as these differences would not result in more severe or substantial impacts to the physical environment beyond what was studied in the Draft EIR. Therefore, changing the zoning nomenclature from MUO to CMUO does not affect the Draft EIR's analysis or conclusions. The proposed code language would not result in any physical environmental effects that are not already evaluated in the Central SoMa EIR; therefore, the proposed Central SoMa code language is consistent with the analysis in the Draft EIR.

Potential Designation of Central SoMa Plan Area as a Housing Sustainability District

The City, through adoption of an ordinance by the Board of Supervisors, could choose to designate portions of the Central SoMa Plan Area as a Housing Sustainability District (HSD) in accordance with Assembly Bill (AB) 73. In order for a HSD to qualify under AB 73, the following general requirements must be met:

1. The HSD must be within one-half mile of public transit, or otherwise highly suitable for residential or mixed-use development;
2. The area of an individual district must not be larger than 15 percent of the city's total land area;
3. An ordinance creating the district must include procedures and timelines for review of projects;
4. At least 20 percent of all housing units constructed in the HSD must be affordable to very low, low, and moderate income households for a period of no less than 55 years; and
5. The HSD must allow for the ministerial approval of housing projects.

The Central SoMa Plan meets criteria 1 through 3 above, and is anticipated to produce over 30 percent below market rate units, which would meet criterion 4. Any local ordinance creating a HSD would allow for ministerial approval of projects, satisfying criterion 5. The HSD could include all or a subset of parcels within the Plan Area that are zoned to permit residential use.

In order to participate in a HSD, an individual project would need to:

1. Include at least 10 percent units on-site affordable to lower-income households (in San Francisco, all projects would still be required to satisfy Planning Code Section 415 inclusionary requirements, either through providing all inclusionary units on-site, or through a combination of on-site and fee payments);
2. Meet labor standards, including prevailing wage and trained workforce requirements, if meeting certain project size thresholds; and
3. Meet any adopted design review standards, be approvable through a ministerial process, and incorporate applicable mitigation measures from the EIR evaluating the HSD ordinance (i.e., this Central SoMa Plan EIR).

The HSD could include all parcels within the Central SoMa Plan Area that are zoned to permit residential use. Should the Plan Area be designated as a HSD, and that designation not result in any changes to height, bulk, density, use or other development standards proposed in the Plan, implementation of the HSD would not change or intensify the anticipated physical or programmatic parameters of development expected or allowed under the proposed Central SoMa Plan. Therefore, designation of a HSD in the Plan Area would not change any of the conclusions reached in the Draft EIR. Furthermore, eligible projects seeking entitlement under the HSD would be required to meet adopted design review standards, be approvable through a ministerial process, and incorporate applicable mitigation measures from this EIR. Pursuant to AB 73, subsequent projects in the Plan Area that meet the requirements of a HSD would not require further environmental review.

Height and Bulk Map Revisions

The Planning Department proposes to alter the proposed Height and Bulk Map from that analyzed in the Draft EIR for a portion of the block bounded by Harrison, Third, Bryant, and Fourth streets.[4] Specifically, the proposal entails extending a 160-CS Height and Bulk District to encompass most of the mid-block area including the eastern half of Lot 112 and all of Lots 113 and 116 within Block 3762. The Draft EIR evaluated the western portion of this mid-block change as a 130-CS Height and Bulk District and the eastern portion as an 85-X Height and Bulk District. See **Figure RTC-1, Existing, Proposed, and Revised Height and Bulk Map for Block 3762**, which depicts the existing height of the block, the proposed heights analyzed in the Draft EIR, and the revised heights now proposed. Draft EIR **Figure II-7, Proposed Plan Area Height and Bulk Districts [Revised]**, and **Figure II-8, Generalized Height Limits, Existing and Proposed Height and Bulk Districts [Revised]**, are also revised to show the changes.

The Planning Department has determined that the potential changes to the Height and Bulk Map would not permit development at a density beyond that included in the population and employment growth forecasts that were the basis for the transportation modeling undertaken for the Draft EIR by the San Francisco County Transportation Authority.[5] The Planning Department quantified the potential development capacity associated with the proposed Height and Bulk Map revisions and determined that the EIR's growth projections are conservative (i.e., high-end) estimates of potential growth because:

1. The EIR studied development capacity resulting from a maximum residential and maximum commercial build out scenario, and
2. The EIR analyzed higher heights than are proposed under the Plan on certain sites.

Therefore, the additional growth facilitated by these revisions to the Plan are adequately captured by the Draft EIR's growth projections. Accordingly, the zoning map changes would not result in growth at levels beyond that evaluated in the Draft EIR, and because no use district changes are proposed, no alteration would occur to land uses assumed in the Draft EIR or to the physical distribution of anticipated development. Therefore, there is no need for further analysis of impacts related to land use (division of a community or conflict with plans adopted to avoid environmental impacts); cultural and paleontological resources (historical, archeological, tribal, cultural, and unique paleontological resources and human remains); transportation (traffic, transit, pedestrian and bicycle circulation, loading, parking, and emergency vehicle access); air quality (consistency with the relevant clean air plan, traffic-generated emissions and construction emissions of criteria air pollutants and fine particulate matter and toxic air contaminants, and odors); noise (traffic-generated noise, noise generated by stationary sources, and construction noise); or hydrology (flooding risk and wastewater generation).

[4] In addition to the height and bulk map revisions discussed in this section, the height on Block 3786 and Lots 321 and 322 were increased from 130 feet in the 2016 Plan to 250 feet in the 2018 Plan. However, the Draft EIR studied a height of 250 feet on these lots and the growth projections used in the Draft EIR also assumed a height of 250 feet on these lots. Similarly, the height on Block 3776 Lot 455 was increased from 55 feet in the 2016 Plan to 65-85 feet in the 2018 Plan. However, the EIR analyzed a height of 115 feet on this site. Therefore, this change in the 2016 Plan does not affect the Draft EIR's environmental analysis or growth projections.

[5] Steve Wertheim, San Francisco Planning Department, "725 Harrison Street" memorandum to Jessica Range, February 23, 2018.

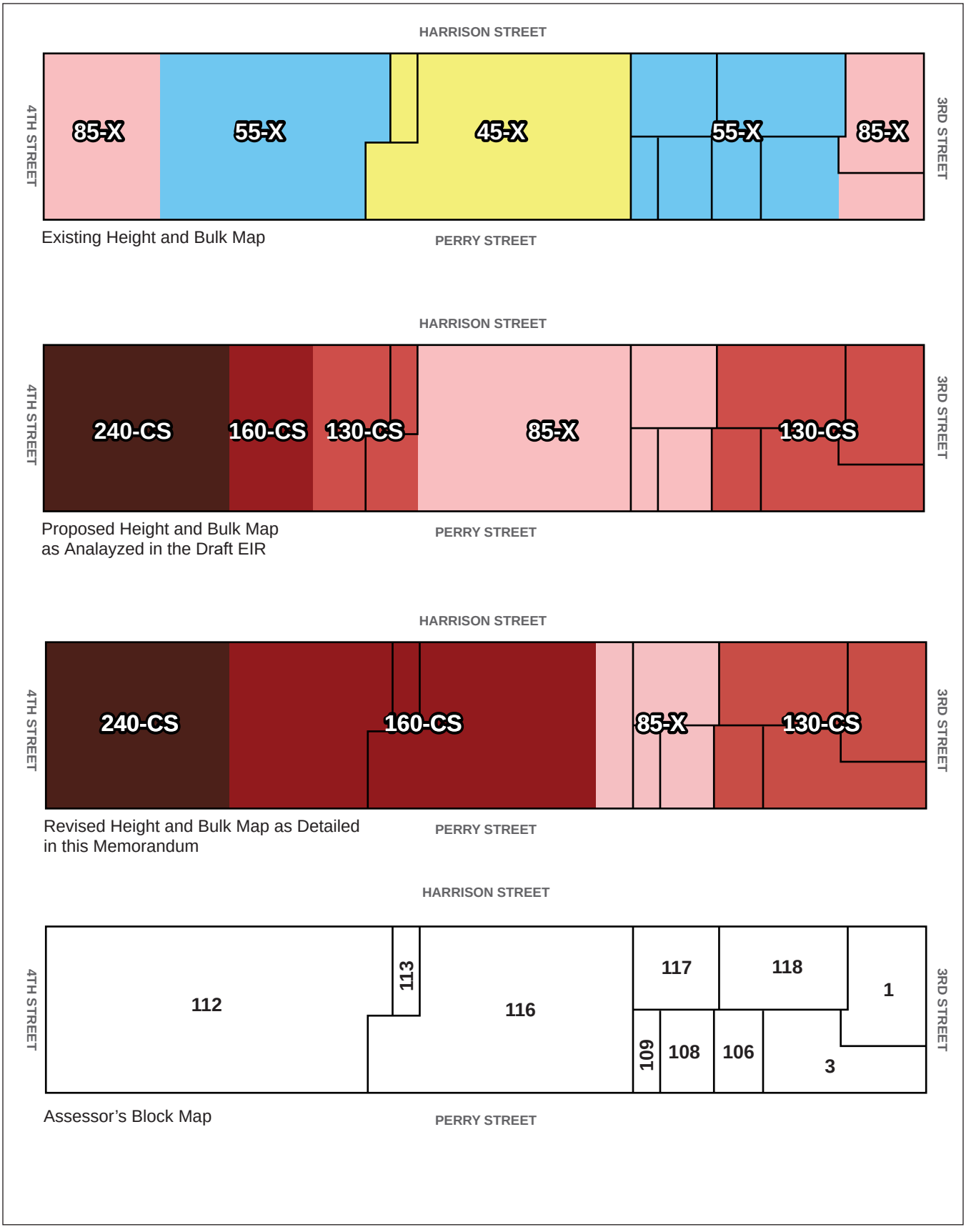


Figure RTC-1
Existing, Proposed, and Revised Height and Bulk Map for Block 3762

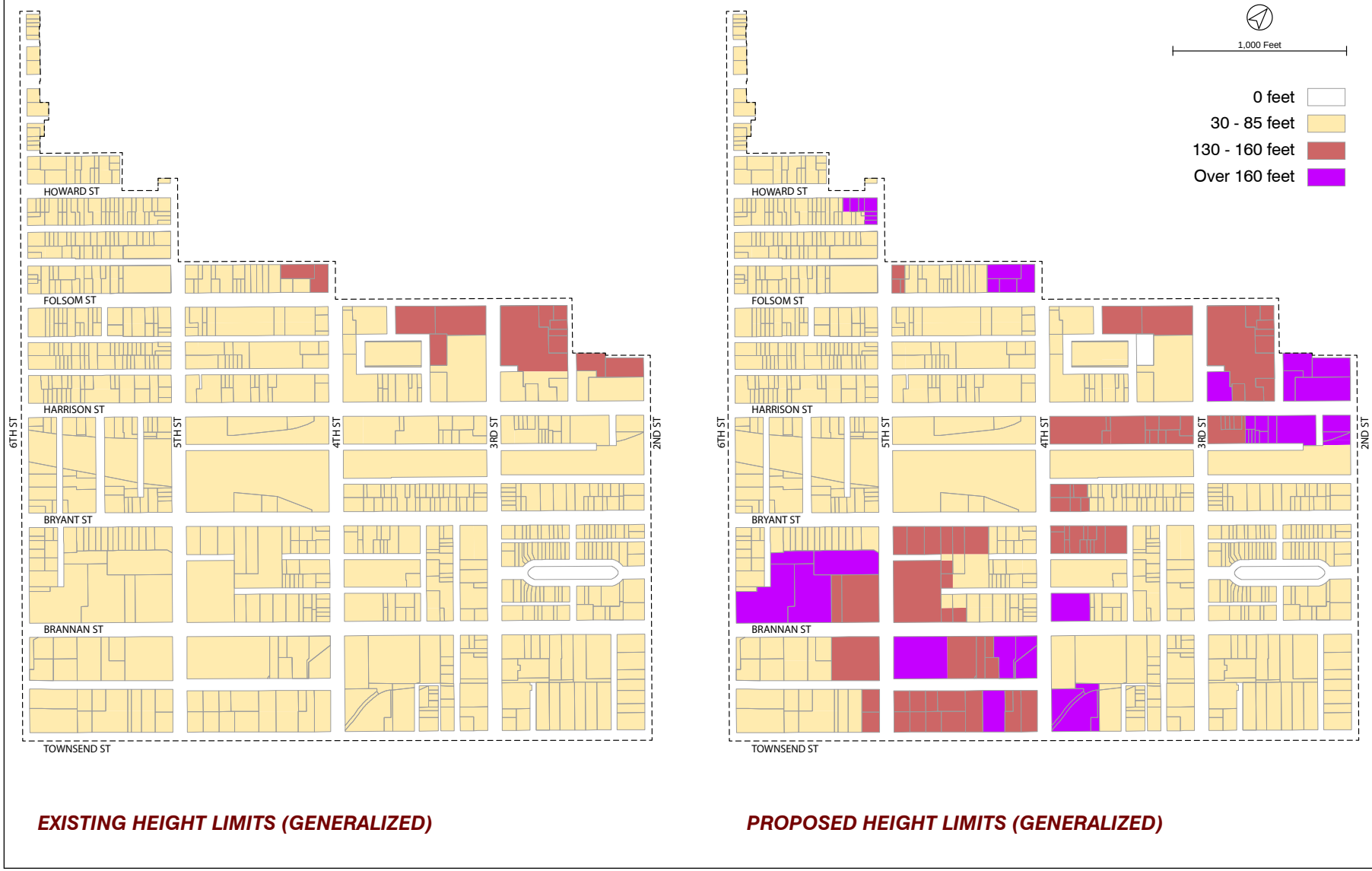


SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure II-7

Proposed Plan Area Height and Bulk Districts [Revised]



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure II-8

Generalized Height Limits, Existing and Proposed Height and Bulk Districts [Revised]

With regard to impacts analyzed in the Initial Study for the Plan, because the intensity of development would not change, there would be no change in impacts related to population and housing, recreation, utilities, or public services. There would be no change in the location of projected development, and no significant change in construction techniques given that a portion of the area of changed height limits (from 130 to 160 feet) was already proposed for a height limit increase of 130 feet, and Building Code requirements are not substantially different for 130-foot-tall versus 160-foot-tall buildings. As such, there would be no substantial change in effects related to site-specific conditions, including biology; geology; hydrology other than flooding and wastewater, analyzed in the Draft EIR, as noted above; or hazardous materials; mineral; energy; and agricultural and forestry resources, analyzed in the Initial Study.

Based on the foregoing, the potential changes in impacts compared to those analyzed in the Draft EIR would be limited to three issues related to building height and bulk: aesthetics, wind, and shadow. Each of these issues is discussed below.

Aesthetics

Analysis in the Draft EIR

The Draft EIR found that development pursuant to the Plan (1) would not substantially degrade the visual character or quality of the Plan Area or substantially damage scenic resources; (2) would alter public views of the Plan Area from short-, mid-, and long-range vantage points and alter views into the surrounding neighborhoods from within the Plan Area, but would not adversely affect public views or have a substantial adverse effect on scenic vistas; and (3) would not create a new source of substantial light or glare in the Plan Area that would adversely affect day or nighttime views or substantially impact other people or properties. All aesthetic impacts were determined to be less than significant, and no mitigation measures were identified.

Analysis of Proposed Changes to the Draft EIR Height and Bulk Map

The proposed change to the Height and Bulk Map on Block 3762 would result in development on the south side of Harrison Street between Third and Fourth streets that would be taller and more massive than analyzed in the Draft EIR. However, the Plan includes, for buildings up to 160 feet, "skyplane" controls that would require setbacks at a height of 85 feet and a reduction in apparent massing of buildings when viewed from across the street, with the required reduction being greater (on a major street such as Harrison Street) for a 160-foot-tall building than for a 130-foot-tall building. Compliance with the Plan's skyplane requirements would result in a relatively small change in views from the street, compared to views with an 85-foot-tall building. And because the reduction in apparent massing would be greater for a 160-foot-tall building than it would for a 130-foot-tall building, the increase in height limit on a portion of Lot 112 and all of Lot 113 from 130 feet to 160 feet would not result in any substantial increase in aesthetic impacts, compared to those of a 130-foot-tall building.

In visual simulations of development in the Plan Area presented in the Draft EIR, there would be little or no change with the proposed alterations to the Height and Bulk Map.[6] In the view from Potrero Hill (Draft EIR Figure IV.B-

[6] Visual simulations of views from Corona Heights (Draft EIR Figures IV.B-15 and IV.B-16) and from I-80 Westbound (Figure IV.B-19) have been revised to correctly portray a 240-foot-tall tower at the southeast corner of Fourth and Harrison streets. The revised figures are presented in Section E.6, Section IV.B, Aesthetics, of Section E, Draft EIR Revisions, of this RTC document.

13, Long-Range Visual Simulation: Texas Street and 19th Street: Existing Conditions Plus Plan, p. IV.B-20, and Figure IV.B-14, Long-Range Visual Simulation: Texas Street and 19th Street: Existing Conditions Plus Plan and Cumulative, p. IV.B-21), a potential 160-foot-tall building mass that would be permitted by the revised Height and Bulk Map would be largely obscured by proposed building masses in front (to the south) of the Harrison Street parcels and, thus, would be difficult to discern. Likewise, in the view from Corona Heights (Draft EIR Figure IV.B-15, Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan, p. IV.B-22, and Figure IV.B-16, Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan and Cumulative, p. IV.B-23), a potential 160-foot-tall building mass that would be permitted by the revised Height and Bulk Map would not have substantially greater visual effects than analyzed in the Draft EIR because this taller building would be shorter than the 240-foot-tall building at the corner of Fourth and Harrison streets, which would partially obscure the 160-foot-tall building further east. Also, the 160-foot-tall building would not be readily apparent from this distant viewpoint because the 160-foot-tall building permitted by the revised Height and Bulk Map would be shorter than the 240-foot-tall building immediately to its west, as well as Plan buildings up to 350 feet in height on the block to the east. Therefore, the 160-foot-tall building would tend to blend in with surrounding proposed development. In views from both of these viewpoints, the 240-foot-tall tower at the southeast corner of Fourth and Harrison streets would be the predominant visual element in the immediate vicinity, and the increase in building heights from 130 feet and 85 feet to 160 feet on Harrison Street just east of this tower would not substantially change the view. Accordingly, no revision to the visual simulations in Figures IV.B-13 through IV.B-16 is required. In the view from westbound I-80 (Draft EIR Figure IV.B-19, Mid-Range Visual Simulation: Interstate 80 Westbound: Existing Conditions Plus Plan, p. IV.B-26), the potential 160-foot-tall building mass that would be permitted by the revised Height and Bulk Map would be nearer to the viewpoint than in Figures IV.B-13 through IV.B-16. This potential building mass would extend east from the proposed 240-foot-tall tower at Fourth and Harrison streets, towards the three towers that could be developed on Harrison Street between Second and Third streets, but would not obscure any open sky or buildings otherwise seen from this viewpoint because the four towers that could be developed already fill the sky, as shown in the visual simulations. Accordingly, the change in view from this viewpoint would be minor, and no revision to the visual simulation in Figure IV.B-19 is required. The location of the potential 160-foot building based on the proposed revised Height and Bulk Map is not visible in the Draft EIR's other visual simulations due to intervening existing building masses proposed under the Plan. The building masses used in the Draft EIR visual simulations, while they include basic setbacks above 85 feet, do not incorporate all potential massing reduction that would be required under the Plan, either for the changed Height and Bulk Map location or for any other building masses shown. For example, no reduction of building masses was made to account for the "skyplane" controls, which would require additional setbacks beyond what was modeled in the visual simulations. Therefore, the simulations are conservative (i.e., worst case).

As with the Height and Bulk Map analyzed in the Draft EIR, the proposed changes to the Height and Bulk Map would not affect any natural scenic resources as none exist in the Plan Area, and existing scenic resources identified in the Draft EIR would not be directly affected as the location of the Height and Bulk Map revisions was assumed to be developed in the Draft EIR. Accordingly, the changes to the Height and Bulk Map would result in no new significant impacts on scenic resources. Light and glare impacts would be similar to those discussed in the Draft EIR because the proposed changes to the Height and Bulk Map are consistent with other heights analyzed in the Draft EIR.

Based on the foregoing, the revisions to the Draft EIR Height and Bulk Map (Draft EIR Figure II-7, p. II-19) would not result in any new or substantially more-severe significant aesthetic impacts than identified in the Draft EIR.

Wind

Analysis in the Draft EIR

The Draft EIR found that development anticipated under the Plan could alter wind in a manner that substantially affects public areas. This was found to be a significant effect of the Plan. Although mitigation in the form of building setbacks and other wind-reduction measures are identified in the Draft EIR, the Draft EIR concluded that, absent project-specific wind-tunnel testing that would be required for taller subsequent projects in the Plan Area, it could not be stated with certainty that each subsequent development project would be able to comply with the Draft EIR's significance criterion without substantial modifications to the project's design and program such that the project would not be able to be developed to allowable building heights proposed by the Plan. Therefore, this impact was identified as significant and unavoidable.

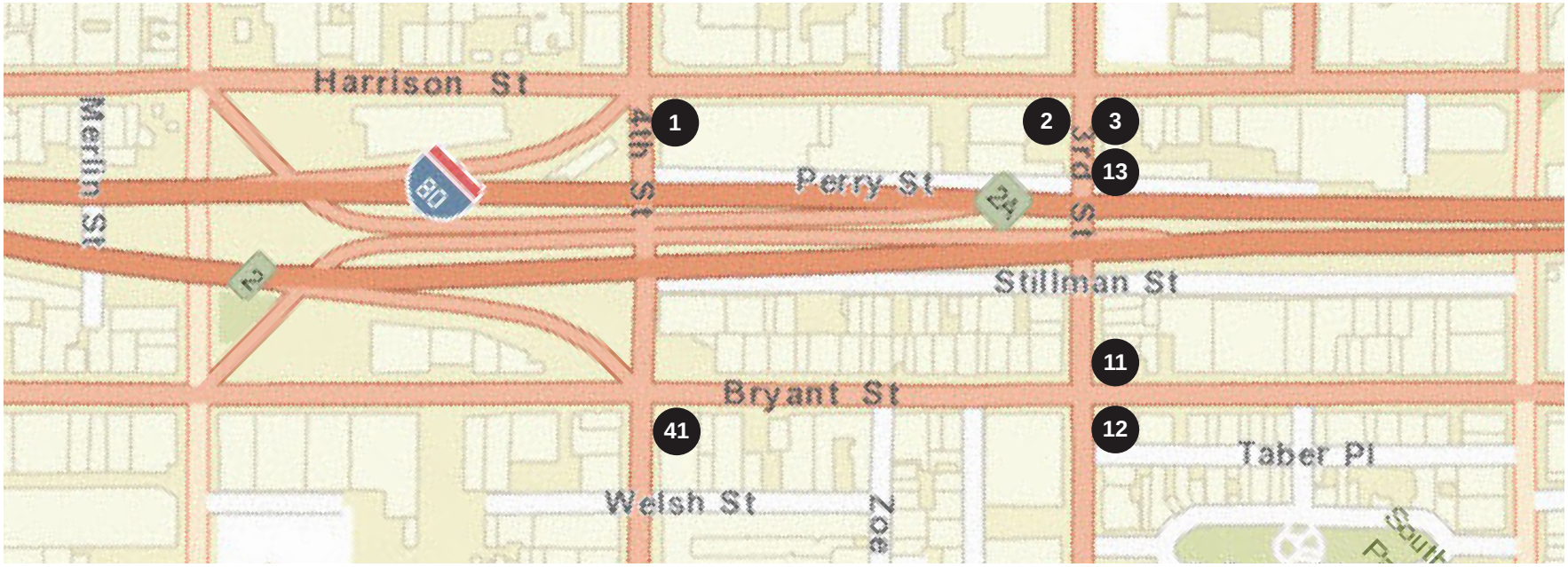
Analysis of Proposed Changes to the Draft EIR Height and Bulk Map

Programmatic wind-tunnel testing for the Draft EIR was undertaken at the Plan level, based on the same building masses as evaluated in the visual simulations, including the revised simulations presented in this RTC document.[7] In the vicinity of the proposed changes to the Height and Bulk Map, wind test points were located at the following seven locations[8] (see **Figure RTC-2, Wind Tunnel Test Points near Block 3762**):

- The southeast corner of Fourth and Harrison streets (at the base of the aforementioned proposed 240-foot-tall tower), Test Point 1;
- The southwest and southeast corners of Third and Harrison streets, Test Points 2 and 3, respectively;
- The northeast and southeast corners of Third and Bryant streets, Test Points 11 and 12, respectively;
- The southeast corner of Third and Perry streets, Test Point 13; and
- The southeast corner of Fourth and Bryant streets, Test Point 41.

No test points were immediately adjacent to the Harrison Street frontage where the Height and Bulk Map changes are proposed; the closest points are those at Fourth and Harrison and at Third and Harrison streets. Existing conditions at the seven test points noted above are moderately windy, with the wind speed that is exceeded 10 percent of the time, or wind comfort speed, ranging from 6 miles per hour (mph) to 19 mph.[9] (In general, conditions in SoMa are less windy than in very windy locations in San Francisco, such as the Van Ness and Market area.) Of the seven test points, the Draft EIR wind-tunnel testing found that Plan Area development would alter the wind comfort speed by 1 to 5 mph. Wind speed would decrease at five of the seven points and would increase at two locations—the southwest and southeast corners of Third and Harrison streets—by 3 mph. Wind speeds do not currently exceed the Planning Code's hazard criterion of 26 mph for one full hour of the year at any of the seven locations under existing conditions and would not do so under conditions with Plan development.

[7] The wind-tunnel testing properly included a 240-foot-tall building at the southeast corner of Fourth and Harrison streets.
[8] For a complete map of the wind test points in the Plan Area, refer to Figure VI.G-2 in the Draft EIR on page IV.G-8.
[9] The wind speed that is exceeded 10 percent of the time (with turbulence factored into the speed) is the speed relied upon in the Planning Code for evaluation of pedestrian comfort. This "wind comfort speed" is useful as a general measure of typical maximum wind speeds, since winds are at or below this speed 90 percent of the time.



Comfort Analysis for Wind Tunnel Test Points Near Block 3762

Test Location Number	Wind Comfort Criterion Speed, (mph)	Existing Conditions		Existing plus Plan Conditions		
		Equivalent Wind Speed Exceeded 10% of Time (mph)	% Time Wind Speed Exceeds Criterion	Equivalent Wind Speed Exceeded 10% of Time (mph)	% Time Wind Speed Exceeds Criterion	Speed Change Relative to Existing (mph)
1	11	15	27	10	8	-5
2	11	6	0	10	5	3
3	11	7	1	10	5	3
11	11	16	29	11	12	-4
12	11	13	18	12	14	-1
13	11	13	17	10	8	-4
41	11	19	38	16	30	-2

Figure RTC-2
Wind Tunnel Test Points Near Block 3762

N Not to Scale

The following analysis specifically addresses potential new wind impacts associated with the increase in height from 85 feet to 160 feet on a portion of Lot 116, and the increase in height from 130 feet to 160 feet on a portion of Lot 112 and all of Lot 113. The proposed changes to the Height and Bulk Map would not be anticipated to substantially alter the above results for the following reasons:

- For the closest test point to the proposed changes (Test Point 1, at Fourth and Harrison streets), the 240-foot-tall proposed tower would have a much greater influence on pedestrian-level winds than the potentially 160-foot-tall adjacent buildings. The 240-foot-tall tower would also have a greater influence on pedestrian-level winds at the test point at Fourth and Bryant streets (Test Point 41). This is because Test Point 41 is downwind with respect to northwest winds (one of the prevailing wind directions) from the location of the 240-foot-tall tower, but is not downwind from the potential 160-foot-tall building mass with respect to any prevailing winds (which originate from a 90-degree range of directions from northwest to southwest). Therefore, increasing a portion of Lot 112 and Lot 113's height by 30 feet would result in a negligible change in wind conditions at Test Points 1 and 41.
- The two test points at Third and Harrison streets (Test Points 2 and 3) are located a minimum of 300 feet northeast of the potential 160-foot-tall building. Generally, the geographic limit for potential horizontal wind effects is two times a building's height. Therefore, any change in wind speed at these two test points resulting from the changes to the Height and Bulk Map is likely to be minimal, compared to wind speeds reported in the Draft EIR.
- The other three test points (11, 12, and 13), while downwind from the location of the proposed Height and Bulk Map changes with respect to west or northwest winds, are all at least 300 feet from the potential 160-foot-tall building. Moreover, the test point on Third Street between Harrison and Bryant streets (Test Point 13) is partially sheltered by the adjacent elevated I-80 freeway (approximately 50 feet in this location), which would further limit any effect of the potential 160-foot-tall building mass that could be built at the location of the Height and Bulk Map revisions. Therefore, wind speeds at these three points also would be only minimally altered by the potential 160-foot-tall building mass, as compared to wind speeds reported in the Draft EIR.

Based on the foregoing, the revisions to the Draft EIR Height and Bulk Map (Draft EIR Figure II-7, p. II-19) would not result in any new or substantially more-severe significant wind impacts than identified in the Draft EIR.

Shadow

Analysis in the Draft EIR

The Draft EIR found that development under the Plan would not create new shadow in a manner that substantially affects existing outdoor recreation facilities or other public areas. This impact was determined to be less than significant, and no mitigation measures were identified. The Draft EIR found that Plan Area development would add new shadow to three parks (South Park, Victoria Manalo Draves Park, and Gene Friend Recreation Center) under the jurisdiction of the Recreation and Park Commission and, therefore, is subject to Planning Code Section 295. However, the Draft EIR found that the relatively minimal new shadow would not be anticipated to adversely affect the use of these parks, and the effect was, therefore, found to be less than significant. The Draft EIR also found that Plan Area development would add new shadow to two non-Planning Code Section 295 open spaces—the Alice Street Community Garden and the Yerba Buena Center Children's Garden. Again, however, the relatively small shadow increment was determined not to adversely affect the use of these spaces, and the effect

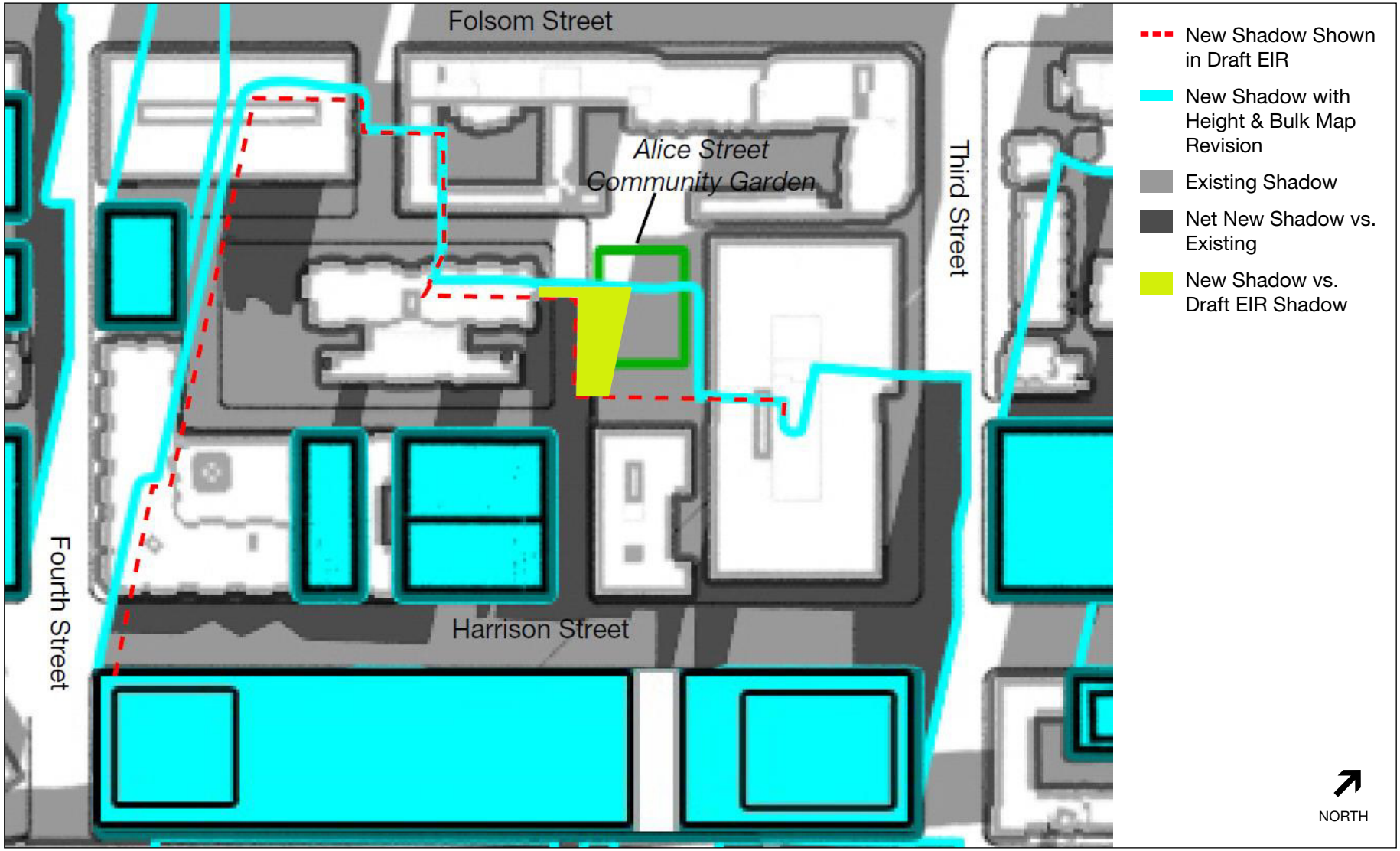
was found to be less than significant. Likewise, Plan-generated shadow was found to result in less-than-significant impacts on nearby privately owned public open spaces (POPOS).

Analysis of Proposed Changes to the Draft EIR Height and Bulk Map

The Draft EIR employed programmatic shadow modeling in support of its analysis, based on the same building masses as evaluated in the visual simulations and wind-tunnel testing.[10] This analysis specifically addresses potential new shadow impacts associated with the increase in height from 85 feet to 160 feet on a portion of Lot 116 and the increase in height from 130 feet to 160 feet on a portion of Lot 112 and all of Lot 113. To evaluate the potential for the proposed Height and Bulk Map changes to result in new or more-severe shadow effects, the modeling was revised to incorporate the potential 160-foot-tall building mass that could be built at the location of the Height and Bulk Map revisions. The results of the modeling show that the only open space for which shadows would be different than those reported in the Draft EIR is the Alice Street Community Garden, where new shadow would be increased at mid-morning and would occur earlier (10 a.m.) around the time of the winter solstice, compared to those reported in the Draft EIR (see **Figure RTC-3, Comparison Between Draft EIR Shadow and Potential New Shadow, Alice Street Community Garden, December 20, 10 a.m.**). However, the increase in new shadow at this time would cover less than 20 percent of the garden, along its western extent, adjacent to Lapu Lapu Street, and this new shadow would leave the garden by 11 a.m., whereas the Draft EIR showed that a new shadow would just reach the southwest corner of the garden at 11 a.m. around the winter solstice. No new shadow, compared to that reported in the Draft EIR, would affect the Alice Street Community Garden at the spring or fall equinoxes or at the summer solstice. Given the very limited new shadow compared to that reported in the Draft EIR, use of the Alice Street Community Garden would not result in substantially more-severe adverse impacts than those reported in the Draft EIR. Compared to existing conditions, the Plan with the changed height limits would cast a small amount of new shadow on the garden late in the afternoon around the spring and fall equinoxes, as well as in mid-morning and at the end of the day around the winter solstice, as reported in the Draft EIR (p. IV.H-36). Therefore, shadow effects would remain less than significant with the revised height and bulk limits, as was reported in the Draft EIR.

The revised Height and Bulk Map, including the potential 160-foot-tall building mass that could result, would increase shadow on Harrison Street and its sidewalks proximate to the site of the map changes (i.e., the block between Third and Fourth streets), as well as on Lapu Lapu Street north of Harrison Street year round. However, this incremental increase in shading would be consistent with typical urban shadows, including in other parts of the Plan Area where new buildings could be constructed, and would not be anticipated to adversely affect the use of nearby sidewalks, given that sidewalks are typically used for pedestrian travel from one location to another. With the change in the Height and Bulk Map, and similar to conditions without the change, shadows upon streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby property may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA. This conclusion would hold true both with and without the revised Height and Bulk Map.

[10] Like the wind-tunnel testing, the Draft EIR shadow analysis properly included a 240-foot-tall building at the southeast corner of Fourth and Harrison streets.



SOURCE: Fastcast

Case No. 2011.1356E: Central SoMa Plan

Figure RTC-3

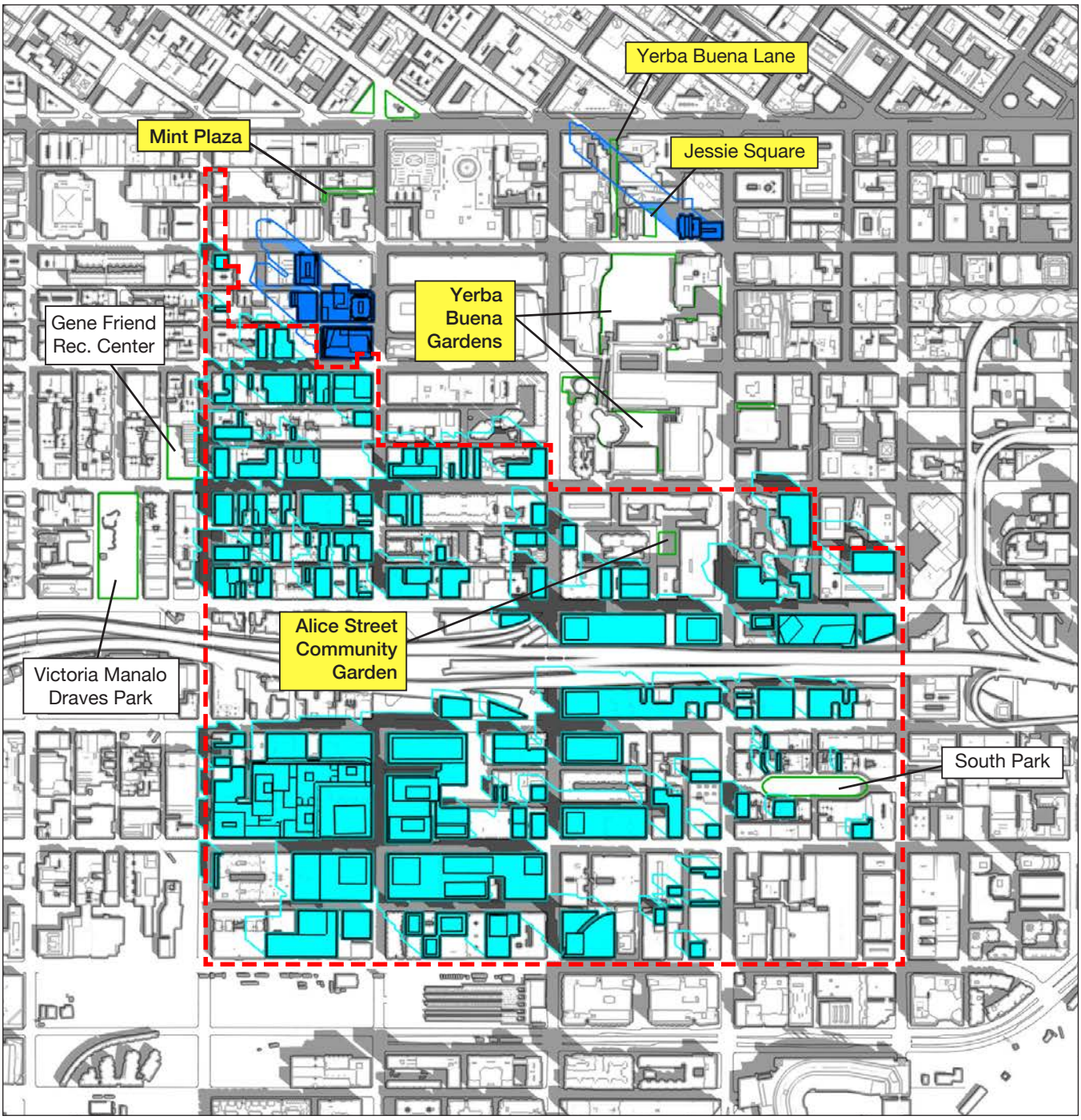
Comparison Between Draft EIR Shadow andPotential New Shadow, Alice Street Community Garden, December 20, 10 a.m.

Based on the foregoing, the revisions to the Draft EIR Height and Bulk Map (Draft EIR Figure II-7, p. II-19) would not result in any new or substantially more-severe significant shadow impacts than identified in the Draft EIR.

To incorporate the shadow effect of changes in the Height and Bulk Map, Draft EIR Figure IV.H-2 through Figure IV.H-10, pp. IV.H-12 through IV.H-20, and Figure IV.H-17 through Figure IV.H-22, pp. IV.H-23 through IV.H-34, have been revised and are presented here. In many cases, there is no change to the shadow patterns depicted in the Draft EIR because the change in the Height and Bulk Map would not result in new or different shadows. As with the Draft EIR, the complete set of figures produced by the computer modeling is included in a revised Draft EIR Appendix E, which is included in this RTC document.

Conclusion

The proposed revisions to the Draft EIR Height and Bulk Map on Block 3762, Lots 112, 113, and 116, would not result in any new or substantially more-severe significant impacts with respect to aesthetics, wind, or shadow, or any other CEQA topic, than those that were identified in the Draft EIR.

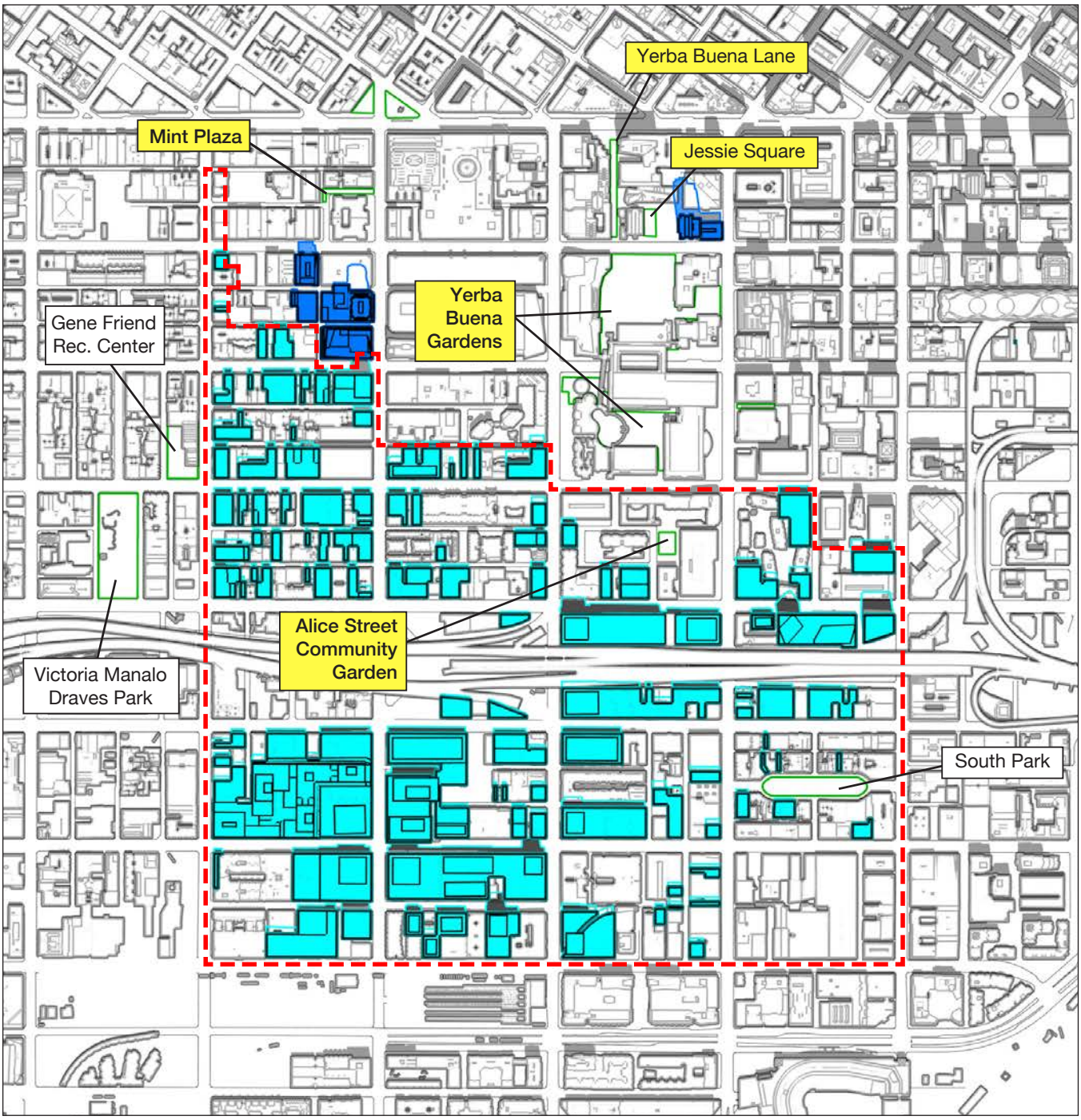


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-2

Shadows: June 21 (Summer Solstice) 9:00 a.m. [Revised]

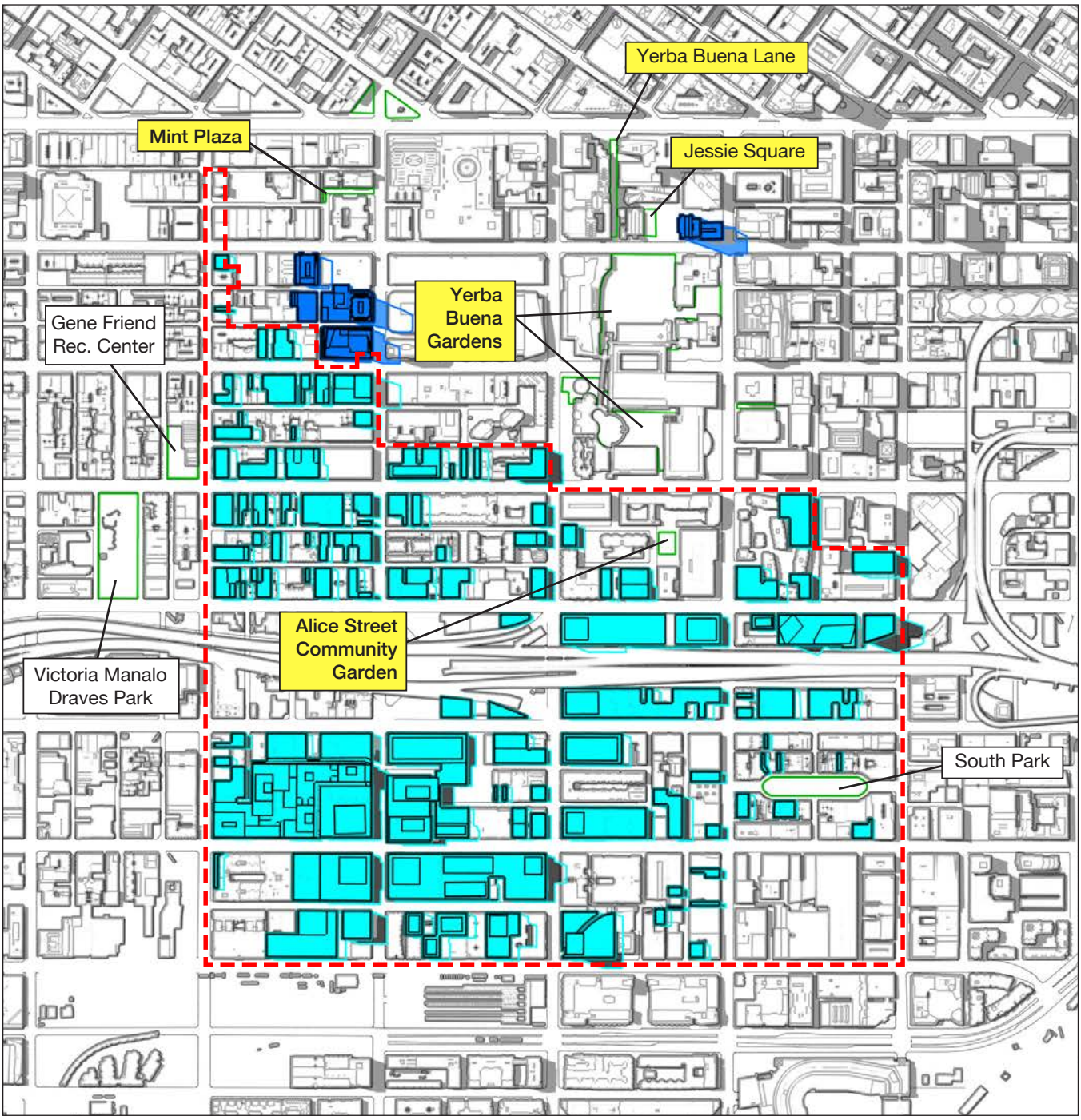


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-3

Shadows: June 21 (Summer Solstice) 12:00 noon [Revised]

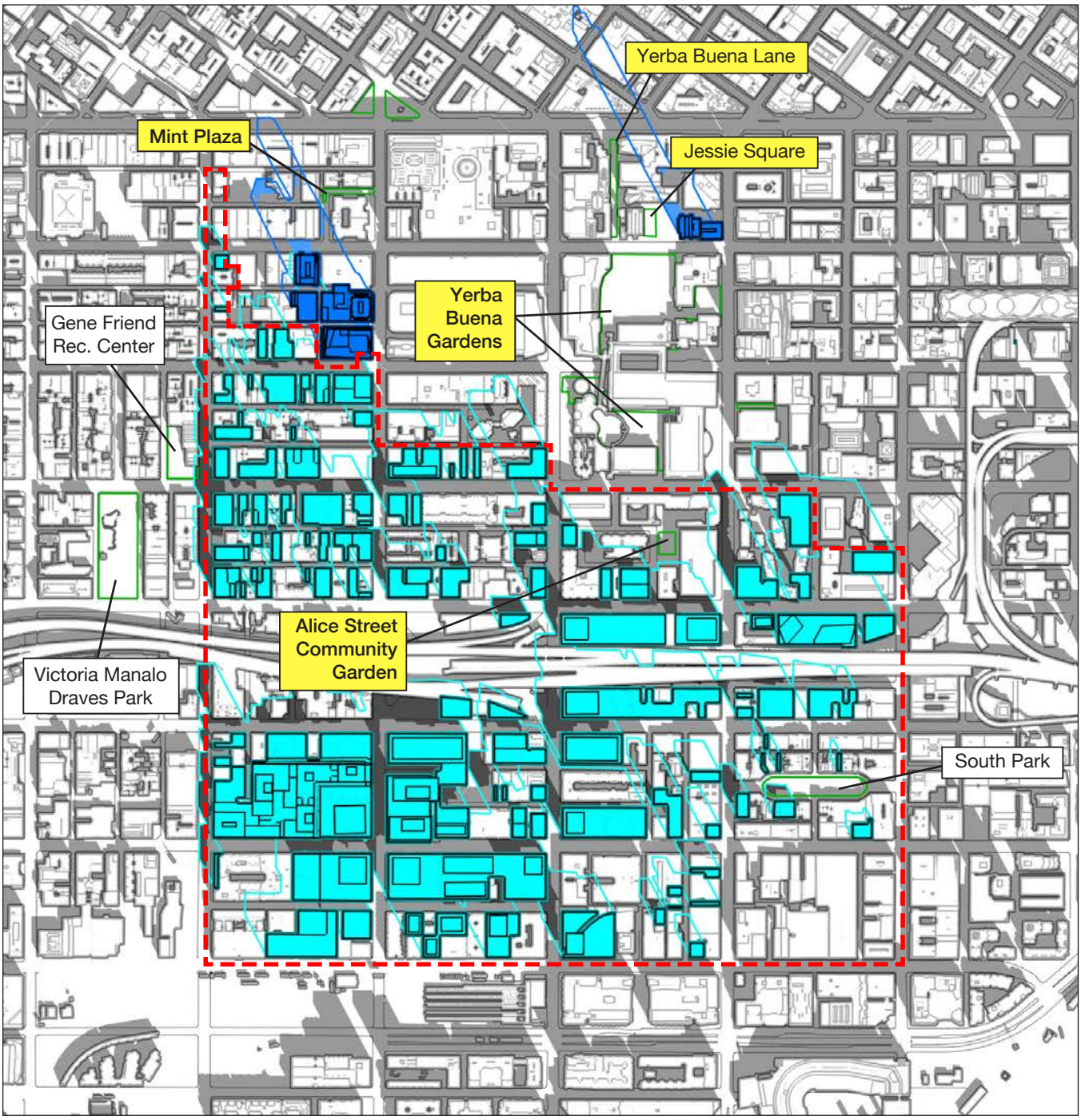


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-4

Shadows: June 21 (Summer Solstice) 3:00 p.m. [Revised]

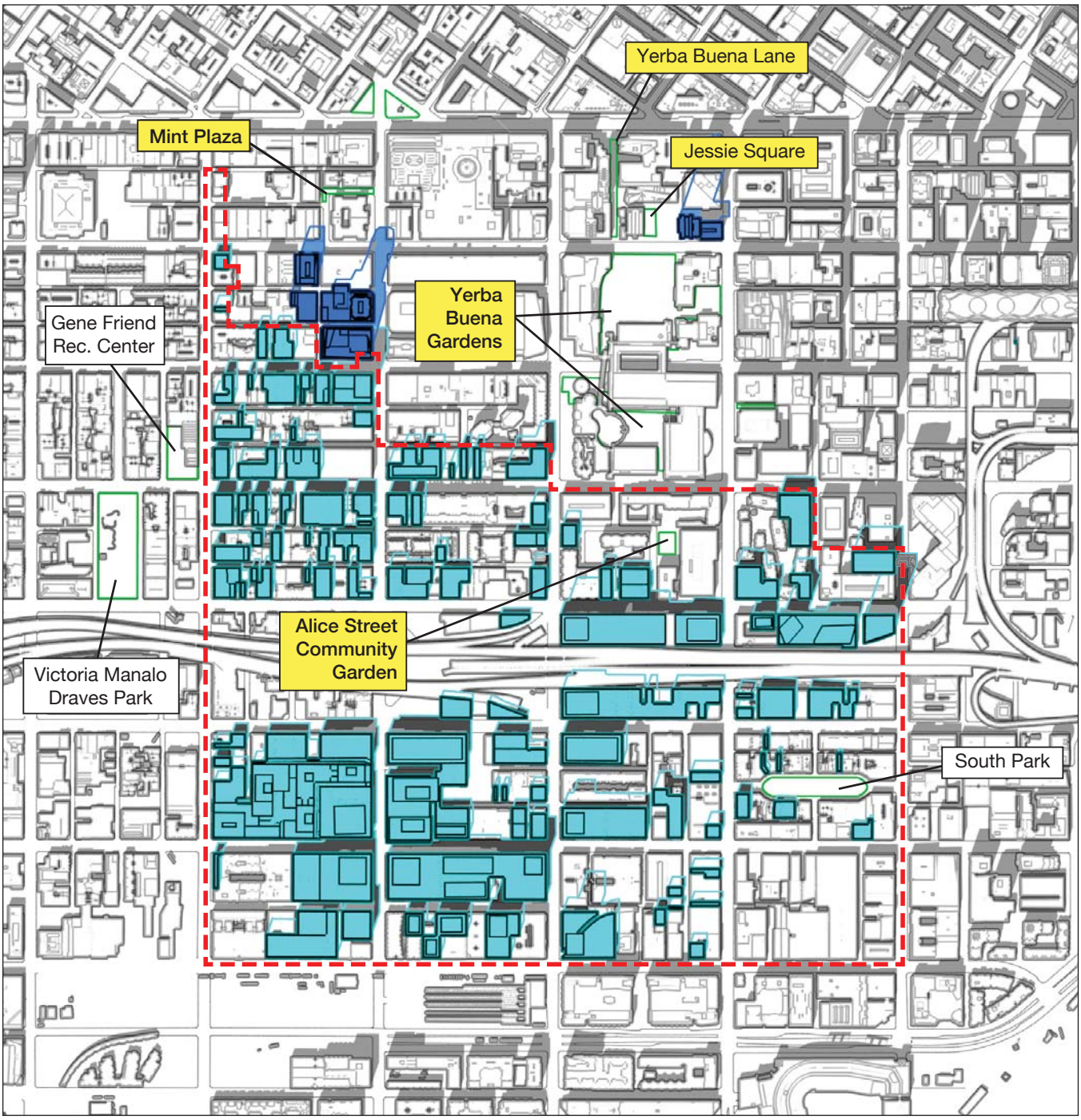


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-5

Shadows: September 20 (Fall Equinox) 9:00 a.m. [Revised]

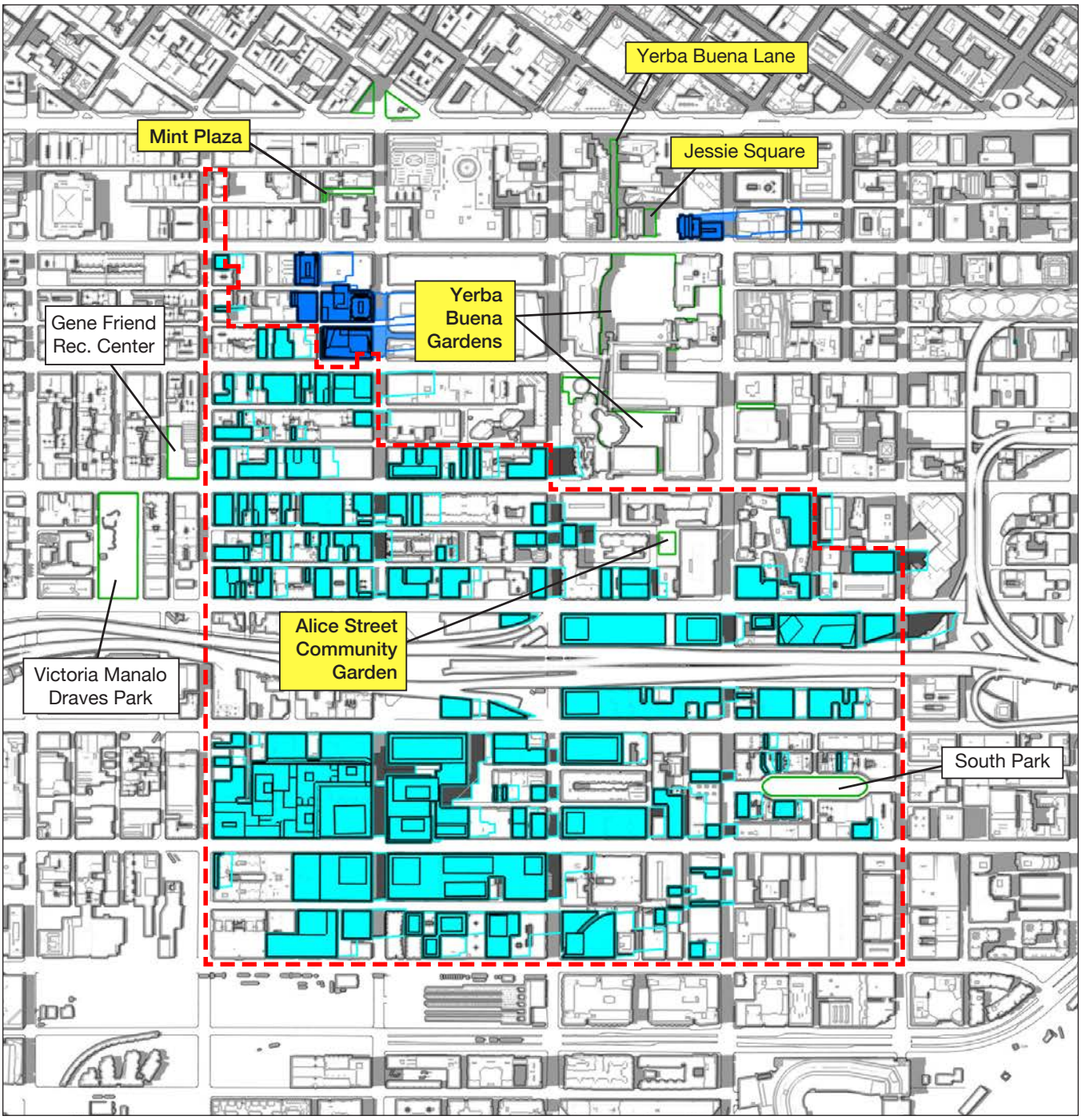


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-6

Shadows: September 20 (Fall Equinox) 12:00 noon [Revised]

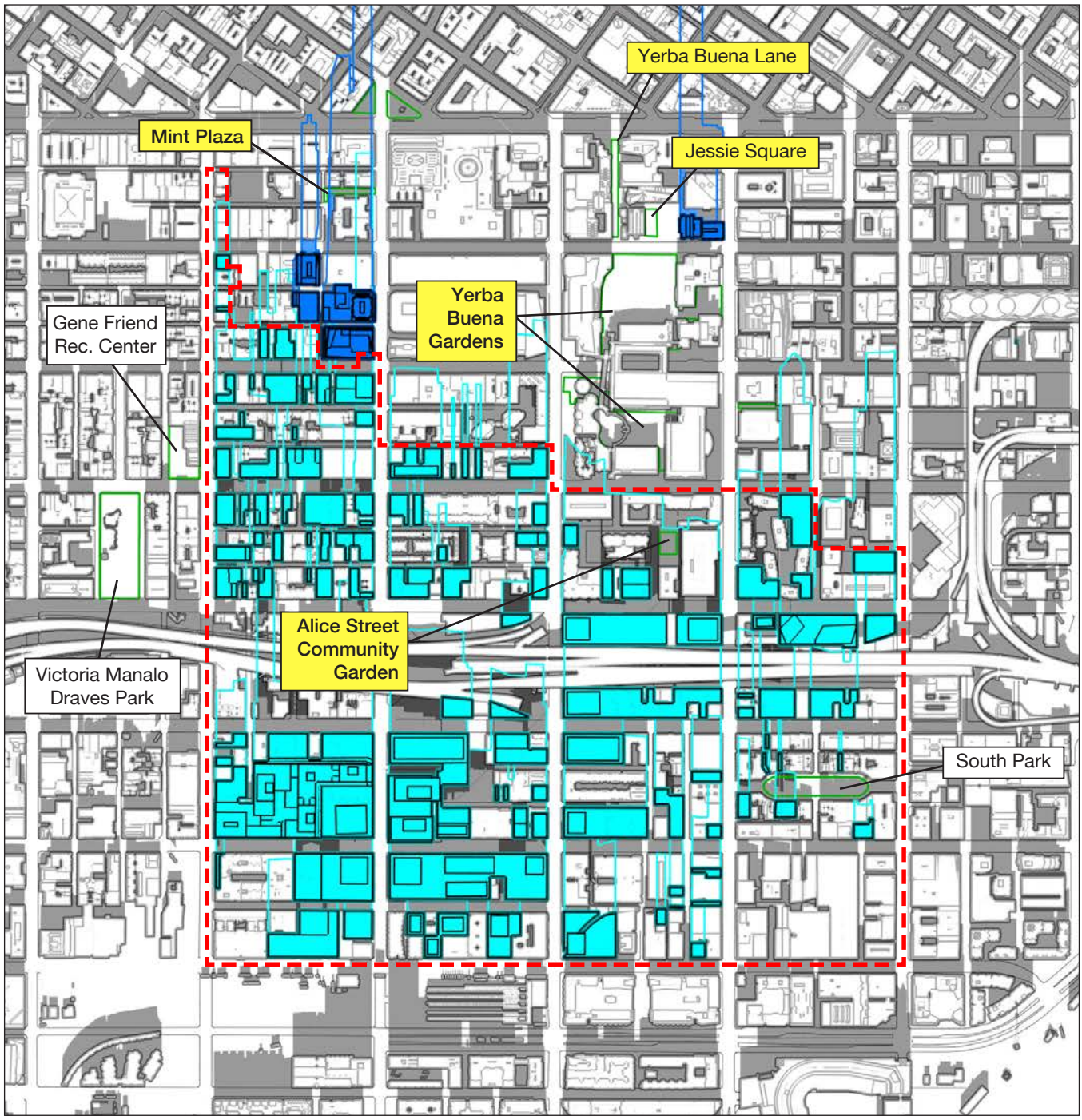


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-7

Shadows: September 20 (Fall Equinox) 3:00 p.m. [Revised]

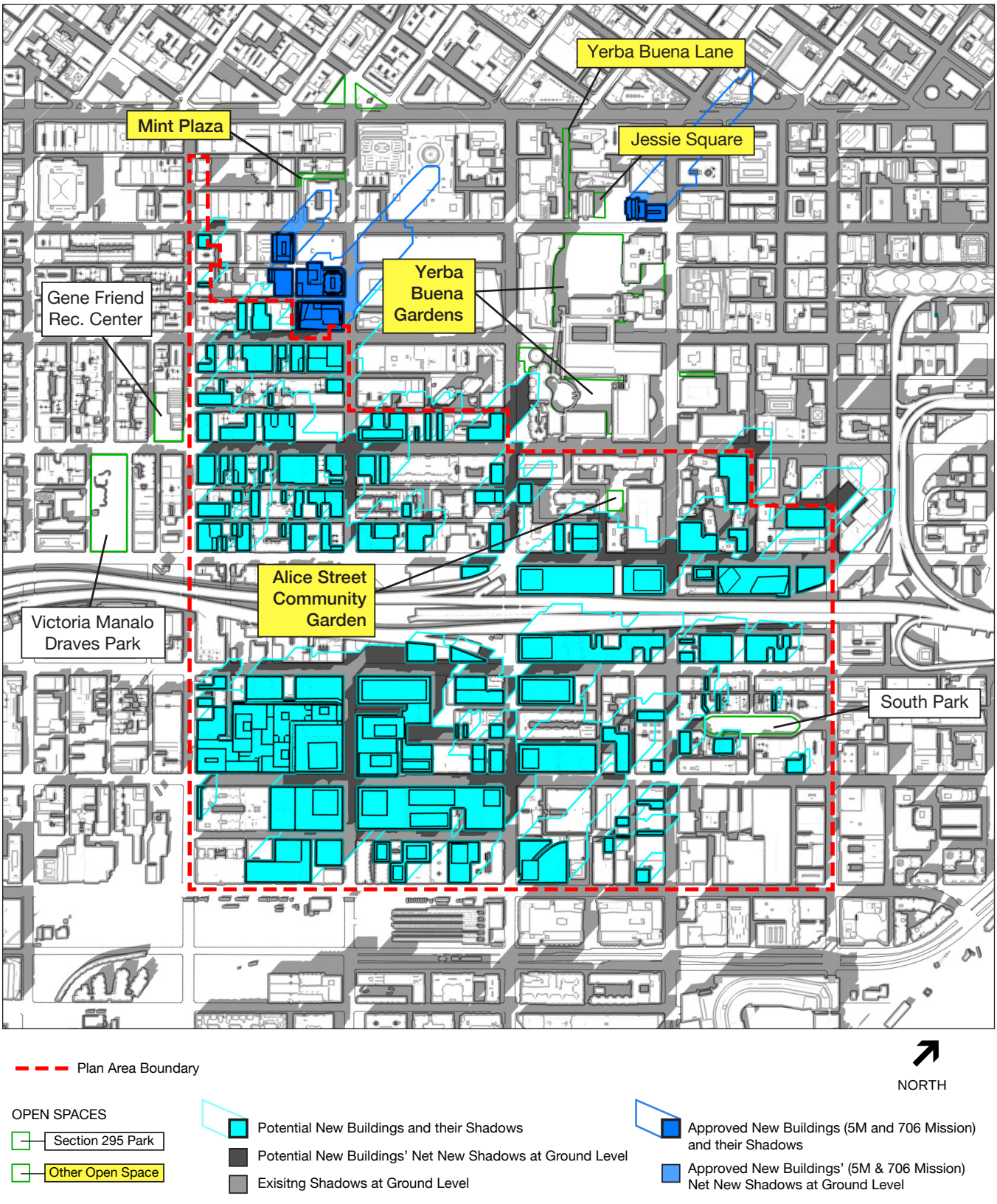


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-8

Shadows: December 20 (Winter Solstice) 9:00 a.m. [Revised]

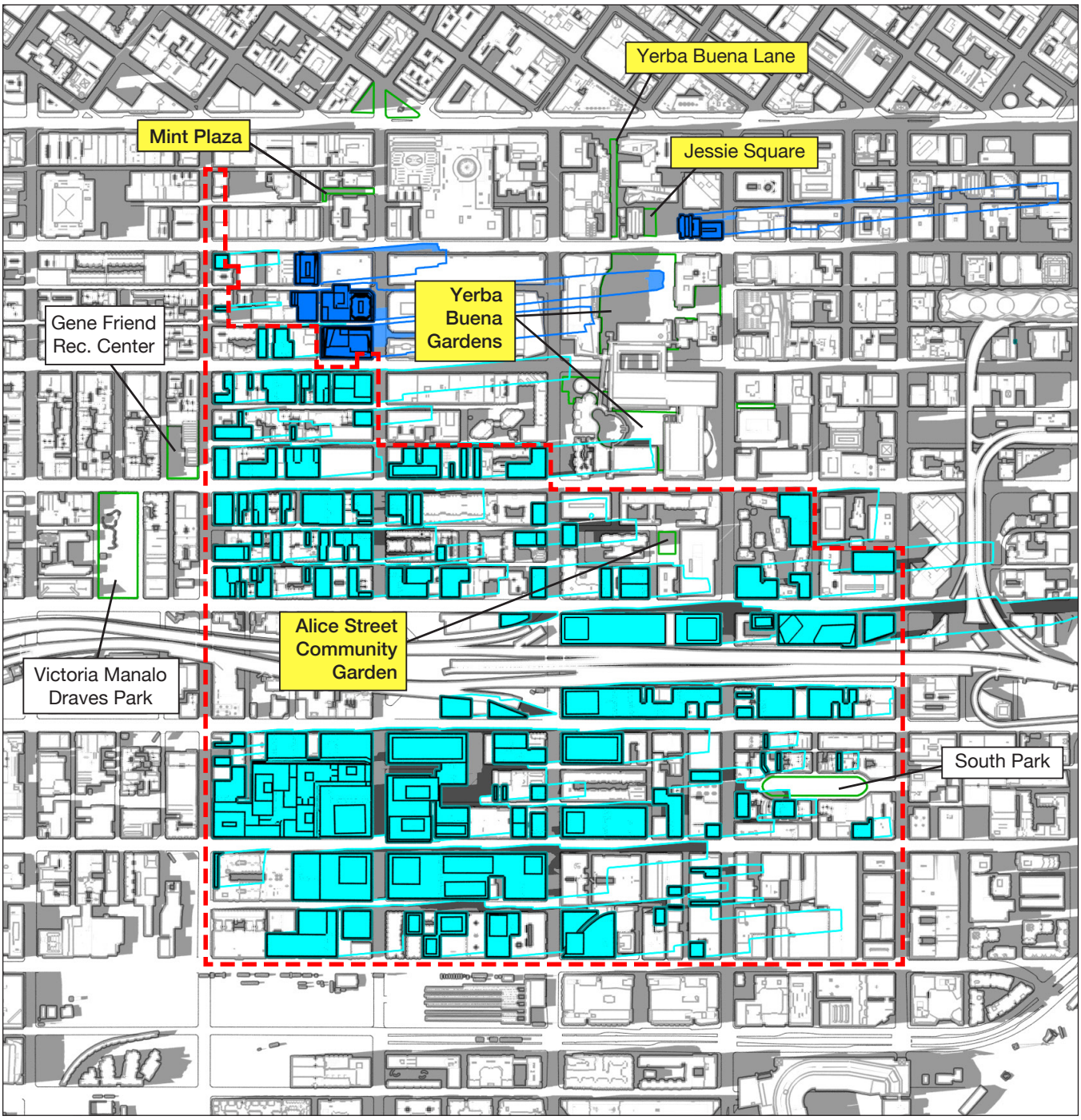


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-9

Shadows: December 20 (Winter Solstice) 12:00 noon [Revised]

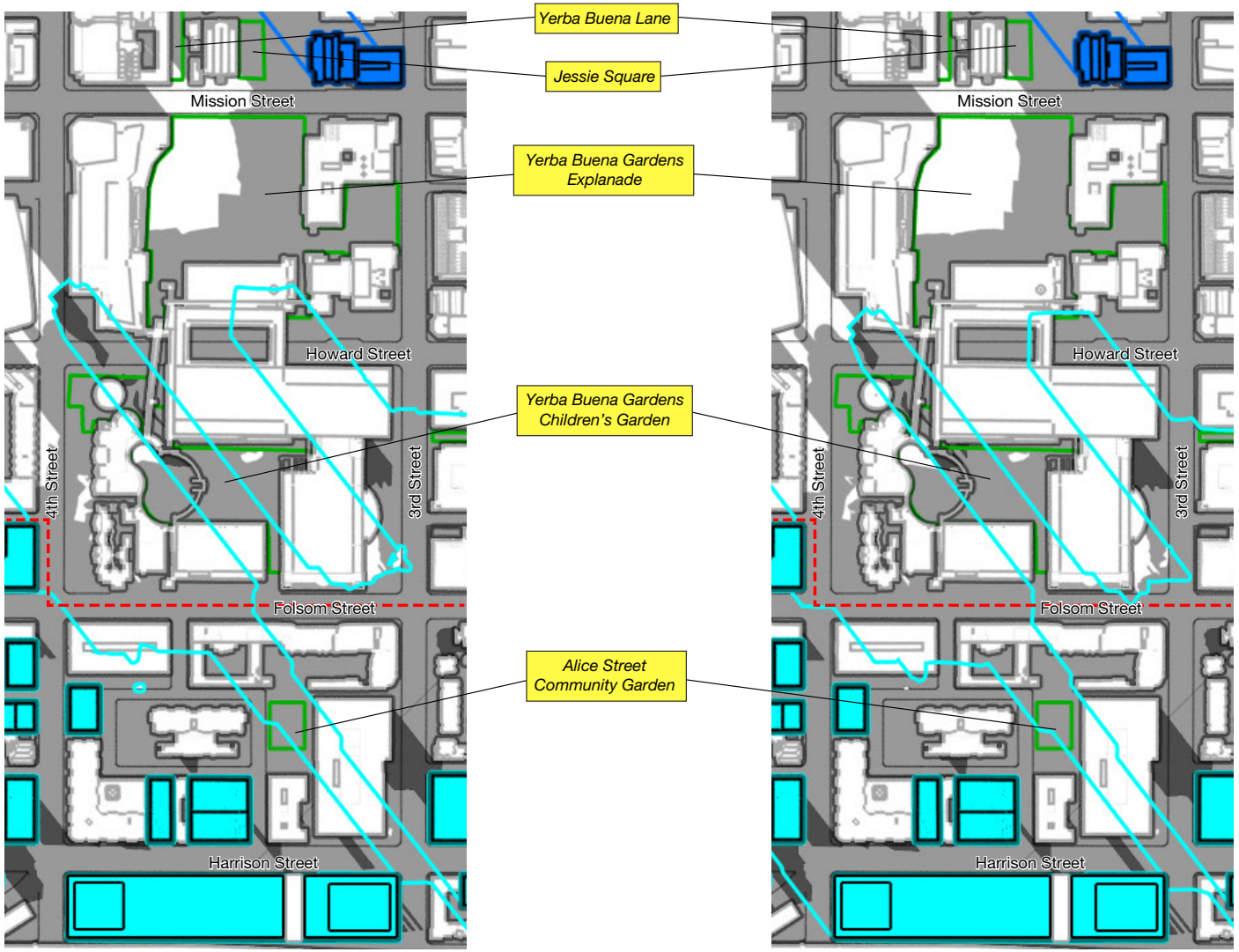


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-10

Shadows: December 20 (Winter Solstice) 3:00 p.m. [Revised]

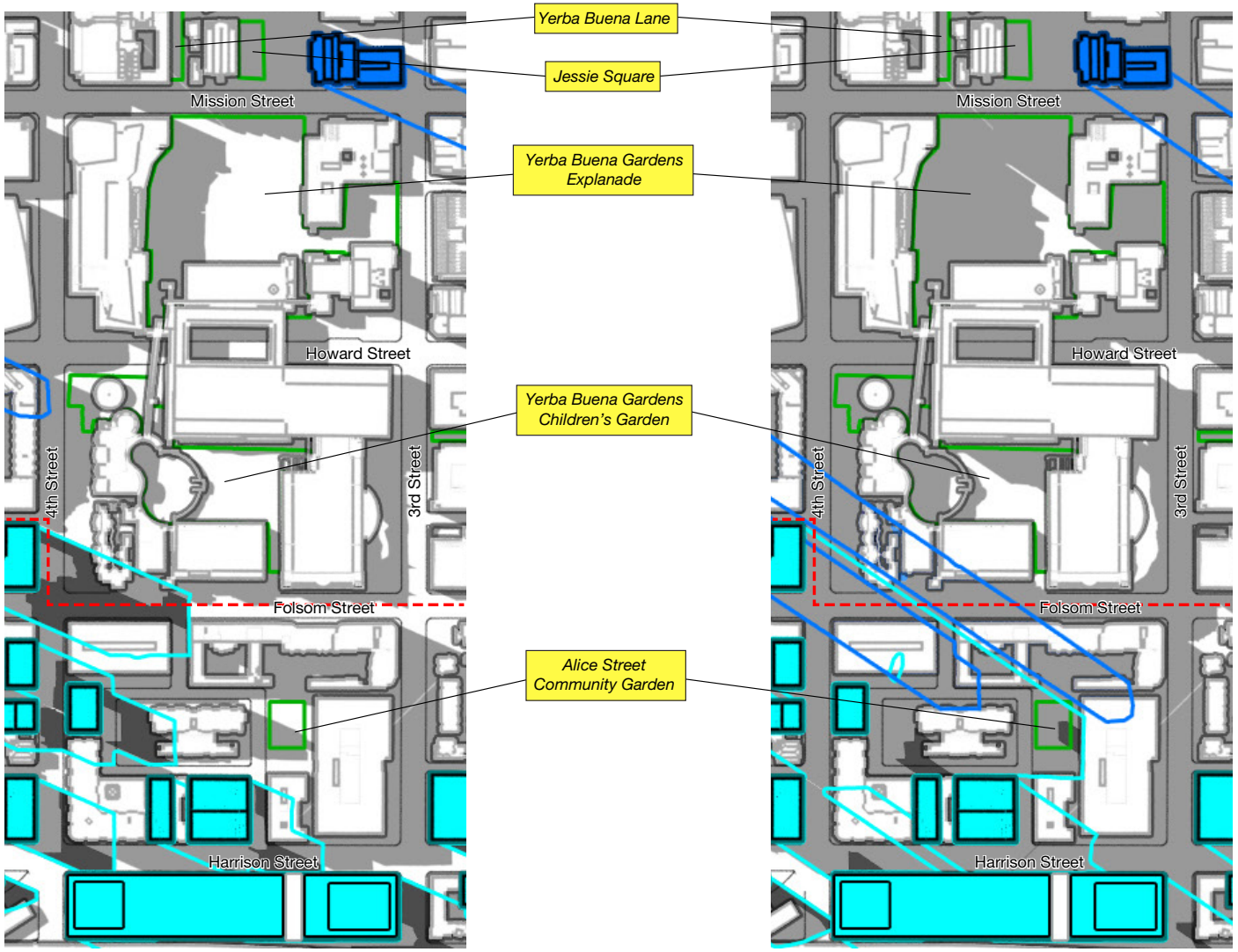


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-17

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, September 20 (Fall Equinox) [Revised]

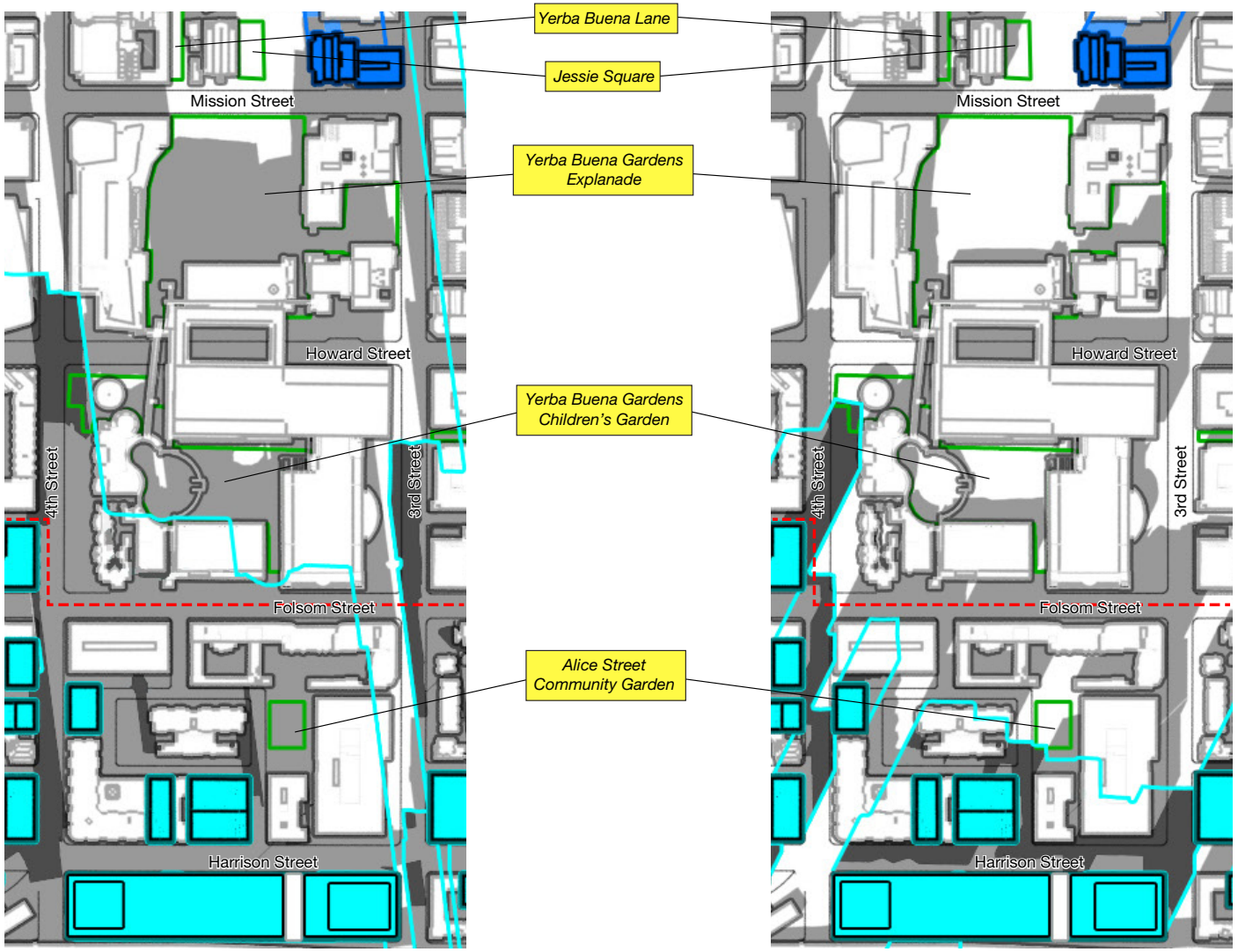


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-18

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, September 20 (Fall Equinox) (continued) [Revised]

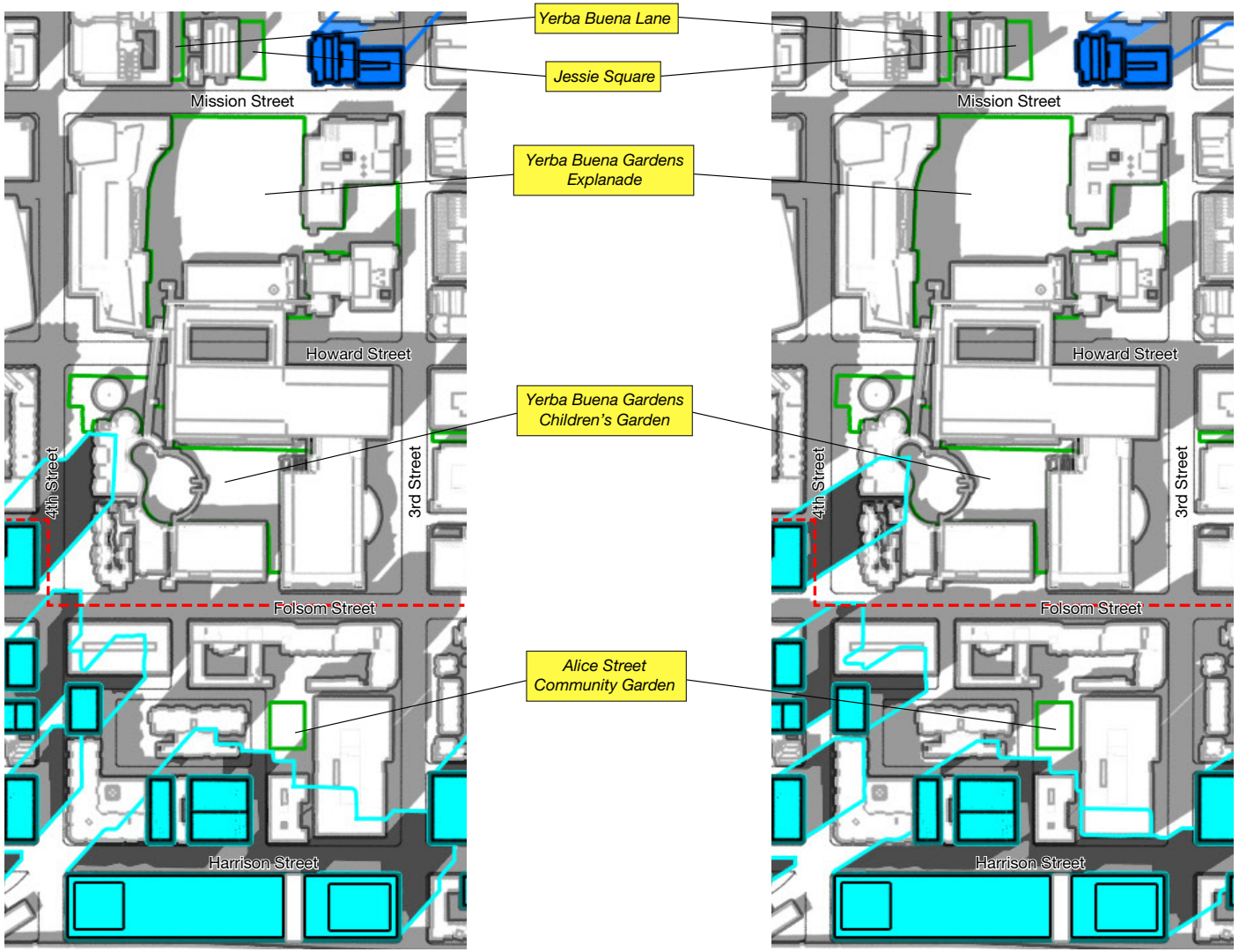


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-19

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) [Revised]

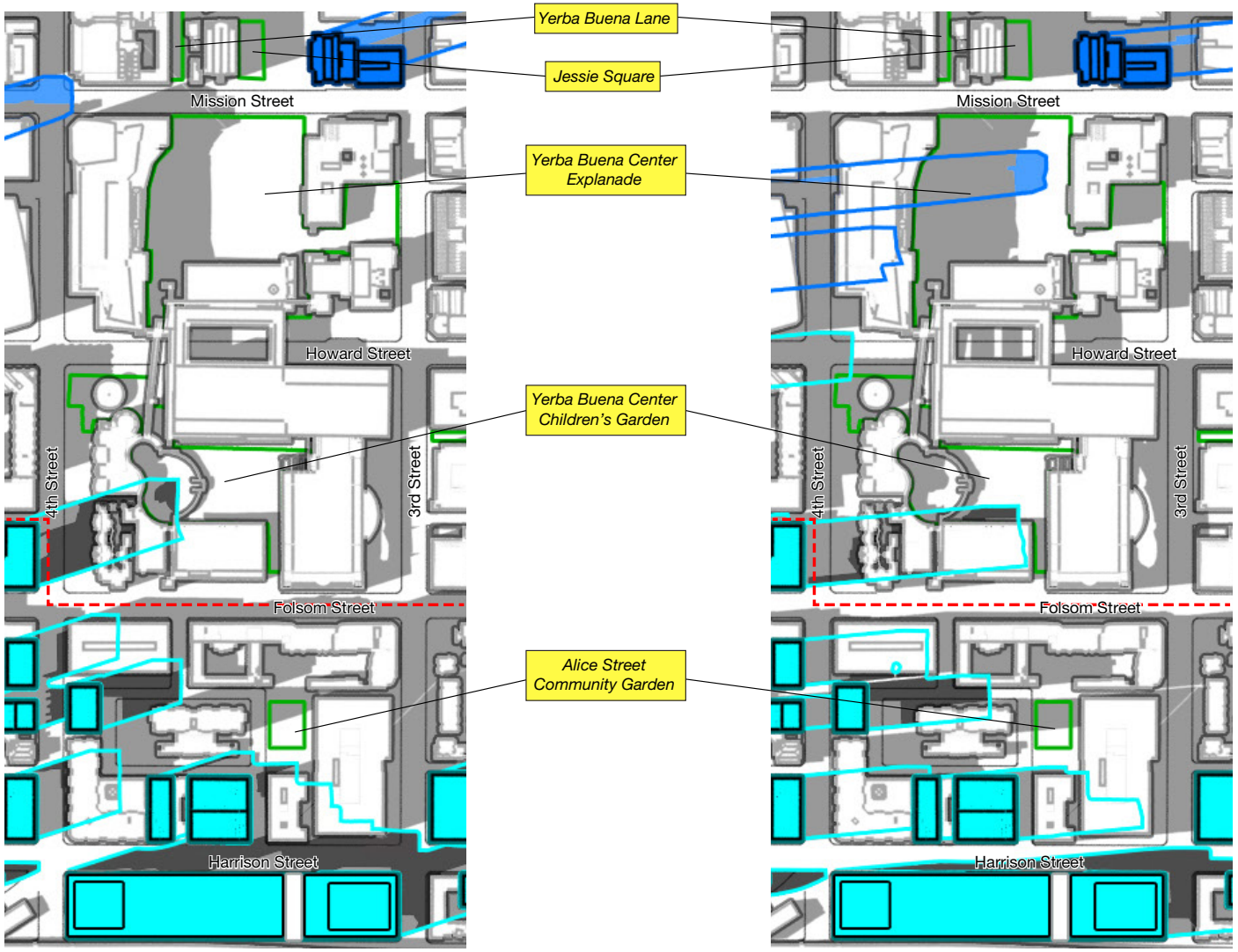


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-20

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]

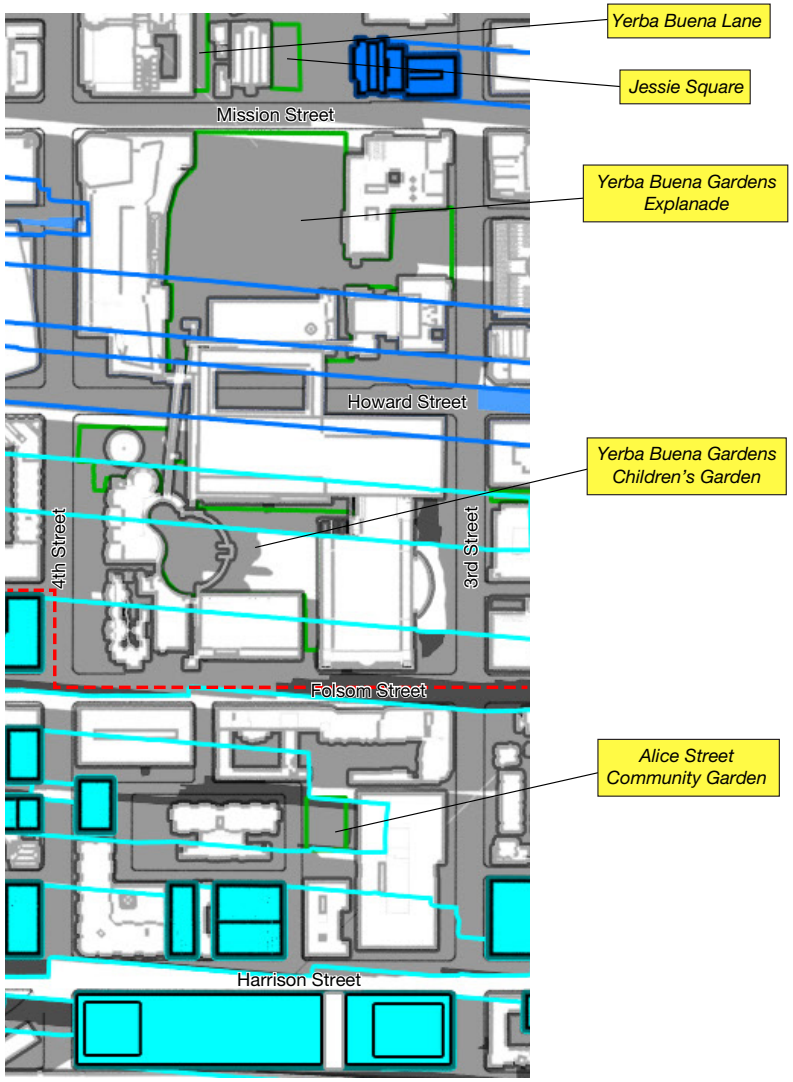


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-21

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]



SOURCE: CADP

Figure IV.H-22

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]

C. List of Persons Commenting

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

In this RTC document, each commenter is assigned a unique commenter code in the following manner:

- Commenters from agencies are designated by "A-" and the agency's name or acronym thereof. In each case where multiple commenters from the same agency provided separate comments, the acronym is followed by each commenter's last name.
- Commenters from organizations are designated by "O-" and the organization's name or acronym thereof. In each case where multiple commenters from the same organization provided separate comments, the acronym is followed by each commenter's last name.
- Commenters as individuals are designated by "I-" and the commenter's last name.

Subsequently, each comment is assigned a number ("#"), which is preceded by the commenter code. For example, the second comment received from a representative of an organization known as "Friends of Friends" would be designated "O-FOF.2," while the third comment received from an individual named Smith would be designated "I-Smith.3." In cases where a commenter has provided both written and oral comments, each set of comments is assigned a "-1" or "-2" to distinguish between written and oral comments, respectively. For example, the third comment from individual Hestor's written comments would be designated "I-Hestor-1.3," while the fifth comment from her oral comments would be designated "I-Hestor-2.5." In this way, the reader can locate a particular comment in a comment letter or the public hearing testimony by referring to the comment's designation.

TABLE RTC-1 PERSONS COMMENTING ON THE DRAFT EIR

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-BART	Val Joseph Menotti, Chief Planning & Development Officer	San Francisco Bay Area Rapid Transit District	Letter	February 14, 2017
A-CPC-Johnson	Christine Johnson, Commissioner	San Francisco Planning Commission	Hearing Transcript	January 26, 2017
A-CPC-Melgar	Myrna Melgar, Commissioner	San Francisco Planning Commission	Hearing Transcript	January 26, 2017
A-CPC-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Hearing Transcript	January 26, 2017
A-CPC-Richards	Dennis Richards, Vice President	San Francisco Planning Commission	Hearing Transcript	January 26, 2017
A-SFMTA	Charles Rivasplata, Senior Transportation Planner	San Francisco Municipal Transportation Agency	Letter	February 10, 2017
Organizations				
O-B505	John Kevlin, Attorney	B505 Industries, LLC	Letter	February 13, 2017
O-CSN-1 O-CSN-2	Richard Drury, Attorney	Central SoMa Neighbors, S.F. Blu	Letter Hearing Transcript	February 13, 2017 January 26, 2017
O-CSPO	Melinda A. Sarjapur, Attorney	Various Central SoMa Property Owners	Letter	February 13, 2017
O-FADF	Bernadette Sy, Executive Director	Filipino-American Development Foundation	Letter	February 13, 2017
O-Freeman	Bill Kuehnle, Vice President and General Manager	Freeman Expositions, Inc.	Letter	June 27, 2017
O-MPHA	Jim Bourgart, Board President	Museum Parc Homeowners Association	Letter	February 10, 2017
O-One Vassar	Melinda A. Sarjapur, Attorney	One Vassar, LLC	Letter	February 13, 2017
O-SDA	Tony Robles, Housing Organizing Director	Senior and Disability Action	Letter	February 13, 2017
O-SFBC	Janice Li, Advocacy Director	San Francisco Bicycle Coalition	Letter	February 14, 2017
O-SFHAC	Corey Smith, Community Organizer	San Francisco Housing Action Coalition	Hearing Transcript	January 26, 2017
O-SFRG-1 O-SFRG-2	John Elberling, Member	San Franciscans for Reasonable Growth	Letter Hearing Transcript	February 13, 2017 January 26, 2017
O-SOMCAN-Cabande	Angelica Cabande, Organizational Director	South of Market Community Action Network	Letter	February 13, 2017
O-SOMCAN-Rogge	Andrew Rogge, Workforce Development Coordinator	South of Market Community Action Network	Hearing Transcript	January 26, 2017

TABLE RTC-1 PERSONS COMMENTING ON THE DRAFT EIR

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
O-SPG	Steven L. Vettel, Attorney	Solbach Property Group	Letter	February 13, 2017
O-Tishman	Melinda A. Sarjapur, Attorney	Tishman Speyer	Letter	February 13, 2017
O-UNITE Here	Cynthia Gómez, Research Analyst	UNITE Here, Local 2	Hearing Transcript	January 26, 2017
O-VEC	Chris Durazo, Coordinator	Bill Sorro Housing Program Veterans Equity Center	Letter	February 13, 2017
O-YBCBD	Scott Rowitz, Vice Chair	Yerba Buena Community Benefit District	Letter	February 13, 2017
O-YBNC-Light-1 O-YBNC-Light-2	Alice Light, TODCO, Director of Community Planning	The Yerba Buena Neighborhood Consortium	Letter Hearing Transcript	January 19, 2017 January 26, 2017
O-YBNC-Elberling	John Elberling, Chair	The Yerba Buena Neighborhood Consortium	Letter	February 13, 2017
Individuals				
I-Brennan	Nicole Brennan		E-Comment	February 13, 2017
I-Camp	Daniel Camp		Email	February 13, 2017
I-Cerles	Marty Cerles Jr.		E-Comment	December 16, 2016
I-Domalewski	Armand Domalewski		Email	February 13, 2017
I-Ferro, A.	Angelo Ferro		Letter	January 26, 2017
I-Ferro, M.	Mike Ferro		Hearing Transcript	January 26, 2017
I-Goldstein	Joshua Goldstein		E-Comment	January 1, 2017
I-Hestor-1 I-Hestor-2	Sue C. Hestor, Attorney		Letter Hearing Transcript	February 13, 2017 January 26, 2017
I-Hong	Dennis Hong		Email	February 13, 2017
I-Margarita	Margarita (no last name given)		Hearing Transcript	January 26, 2017
I-Meader	Arthur Meader		Hearing Transcript	January 26, 2017
I-Nagy	Tamas Nagy		E-Comment	December 18, 2016
I-Patterson	Richard North Patterson		E-Comment	December 18, 2016
I-Renee	Denise Renee		Hearing Transcript	January 26, 2017
I-Rosenberg	Isaac Rosenberg		E-Comment	January 23, 2017

TABLE RTC-1 PERSONS COMMENTING ON THE DRAFT EIR

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
I-Schuttish	Georgia Schuttish		Email	February 13, 2017
I-Schwark-1 I-Schwark-2	Jon Schwark	San Francisco Bay Area Renters Federation	Hearing Transcript Letter	January 26, 2017 February 13, 2017
I-Su	Justin Su		Email	February 13, 2017
I-Weel	Jaap Weel		Email	February 13, 2017
I-Whitaker	James Whitaker		Email	February 12, 2017
I-Zhang	Jingzhou Zhang		E-Comment	December 16, 2016

D. Comments and Responses

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

Project Description [PD]
Plans and Policies [PP]
Overview [OV]
Land Use and Land Use Planning [LU]
Aesthetics [AE]
Cultural and Paleontological Resources [CP]
Transportation and Circulation [TR]
Noise and Vibration [NO]
Air Quality [AQ]
Wind [WI]
Shadow [SH]
Hydrology (Sea Level Rise and Combined Sewer System) [HY]
Other CEQA Considerations [OC]
Alternatives [AL]
Cumulative Impacts [CU]

Initial Study Topics
Population and Housing [PH]
Recreation [RE]
Public Services [PS]
Biological Resources [BI]
Geology and Soils [GE]

Plan Merits [PM]
General Comments (GC)

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

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

D.1 Project Description

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

- Comment PD-1: 636–648 Fourth Street Project
- Comment PD-2: Address Potential Maximum Building Heights and Potential Modified Massing Requirements
- Comment PD-3: Building Heights On and Near Flower Mart Site
- Comment PD-4: Folsom/Howard Streetscape Project Analysis Is Not Clear
- Comment PD-5: Impact of Plan on Production, Distribution, and Repair (PDR) Uses
- Comment PD-6: Initial Study Describes a Different Project than the Draft EIR and the Initial Study Is Inadequate
- Comment PD-7: Pedestrian and Bicycle Improvements
- Comment PD-8: Request for Park on Second Street
- Comment PD-9: Revise Maximum Height Proposed for Parcels North of I-80 Freeway and East of Fourth Street
- Comment PD-10: State Density Bonus Program
- Comment PD-11: Street Network Changes
- Comment PD-12: Tower Separation Policy
- Comment PD-13: Proposed Changes to 330 Townsend and 636–648 Fourth Streets

Note: Comments stating that the Plan should facilitate more residential development than is proposed are responded to in Section D.14, Alternatives, along with similar comments calling for alternative(s) with more housing.

Comment PD-1: 636–648 Fourth Street Project

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

O-SPG.1

"On behalf of Solbach Property Group ('Solbach'), we submit the following comments on the Draft Environmental Impact Report ('DEIR') for the Central So Ma Plan ('Plan'), Planning Department Case No. 2011.1356E.

"Solbach is the owner of 636-648 Fourth Street (Block 3786 / Lot 035), a 17,406 square foot parcel at the northwest corner of Fourth and Bluxome Streets within the proposed Plan area located ½ block from the Caltrain Station and one block from the Bryant Street Central Subway stop. The property is currently within the MUO zoning

district and 85-X height and bulk district, and is within a subarea of Plan proposed for intensive commercial and residential development and substantial height limit increases.[1]

"Solbach has submitted an Environmental Evaluation application to the City and County of San Francisco ('City') for a proposed mixed use development project ('Project') at the property, consistent with the objectives of the Plan. The Project proposes to demolish two existing non-historic one- and two-story commercial buildings[2], a parking lot and a general advertising sign structure, and construct a primarily residential tower with ground floor commercial space. Solbach's preferred development scenario for the Project is a not less than 350-foot tall tower containing not less than 392 dwelling units, of which approximately 18% (at least 71 units) are proposed to be on-site affordable units. The tower would have maximum floor plates of approximately 10,785 square feet and be spaced more than 115 feet away from any adjacent towers, consistent with the bulk limits proposed in the Plan. At the proposed height, the Project would need to construct off-site open space by developing much of the Bluxome Linear Park, proposed in the Bluxome Street right-of-way between Fourth and Fifth Street adjacent to the Project site (DEIR at II-31), whereas a smaller project could fulfill almost all of its open space requirement on-site.

"The preferred Project is fully consistent with the objectives and goals of the Plan, including:

- Objective 1 ('Increase the capacity for jobs and housing');
- Objective 5 ('Offer an abundance of parks and recreational opportunities'); and
- Objective 8 ('Ensure that new buildings enhance the character of the neighborhood and the City').

"See DEIR at II-5 to II-6.

"The Project is among the several dozen 'Subsequent Development Projects' that are described as projects that would proceed under the Plan, if approved. On page IV-8, the DEIR indicates that these projects are analyzed not as cumulative developments, 'but rather in the Plan analysis, as the proposed uses and intensity of development would be allowed under the Plan.' The Project is described as including 'a 350-foot-tall primarily residential tower with 427 units.' This scale and density of development, consistent with Solbach's proposed Project, was therefore included in the DEIR's analysis of potential physical impacts of the Plan.

"However, elsewhere in the DEIR, this intensity of development for the Project site appears not to be properly analyzed. For example, the proposed height map at Figure II-7 of the DEIR shows a proposed height limit of 250 feet for the property, not 350 feet. Height limits of 400 feet and 300 feet are proposed on sites on which residential towers are proposed immediately adjacent to the Project site. A 250-foot height limit on a 17,406 square foot site cannot accommodate anything close to the 427 units that the DEIR states was analyzed in the Plan DEIR.

"The DEIR is therefore inadequate for its failure to fully examine at least 350 feet as the preferred height limit for the Project site, despite (1) the DEIR stating that intensity of development is analyzed in the DEIR, (2) the policies of the Plan being more fully implemented by a development of 350 feet at the Project site, (3) higher height limits on adjacent residential sites, and (4) the lack of any significant differences in environmental impacts between a 250-foot tall structure and a 350-foot tall structure at the site, as discussed in further detail below. The Final EIR should provide a consistent analysis of the physical impacts associated with a height limit of at least 350 feet at the Project site.

"Notably, such a clarification in the Final EIR is permissible without the need to recirculate the DEIR. Recirculation is only required where significant new information is added, which includes the following situations: (1) a new significant environmental impact from the project or from a new proposed mitigation measure; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the significant environmental impacts of the project but is not adopted; or (4) the DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. See 14 C.C.R. § 15088.5(a). On the other hand, recirculation is not required where the new information added to the EIR 'merely clarifies or amplifies.' See 14 C.C.R. § 15088.5(b). Here, Solbach merely seeks clarification as to the potential impacts of a 350-foot height limit at the project site and amplification of the potential impacts associated with development at that height.

"Moreover, any such analysis will establish that there is no significant difference in terms of environmental impacts between 250 feet (the height limit indicated in Figure II-7) and at least 350 feet (the proposed height for the Project as described on page IV-8) and will not change the conclusions of the DEIR.

- Visual Impact. A preliminary visual simulation analysis was completed in December 2016 for the proposed Project at various heights, from 250 feet to 450 feet, attached hereto as Exhibit A. The visual simulations establish little to no change in aesthetic impacts between 250 feet and 450 feet in height. This is further supported by the conclusions of the DEIR itself, which found that taller buildings 'would alter or partially obscure long-range views of the Bay … but not to the extent that any view would be substantially impaired.' (DEIR at IV.B-38). The Plan already proposes 400-foot and 300-foot height limits for sites in the immediate vicinity of the Project site. The DEIR concluded that development pursuant to the Plan would have a less-than-significant impact on views and scenic vistas. In any event, skyline and other visual impacts are not considered significant effects for urban infill projects: 'Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.' (Pub. Resources Code, § 21099(d)(l).)
- Transportation. The Project is located in TAZ 644, where vehicle miles traveled are substantially less than the regional average for both residential and retail land uses (DEIR Table IV.D-7), such that the Project will have no significant traffic impacts at the density proposed, particularly because the Project will be subject to the newly enacted TDM ordinance. Transit, pedestrian, bicycle, emergency vehicle and construction impacts of a 392-unit project at the Project site would not differ significantly from those analyzed in the DEIR should the transportation analysis for the DEIR have assume less than that density of development for the site.
- Shadows. Pre Vision Design prepared a shadow screening analysis, taking into account existing buildings, for a 350-foot tower at the Project site, attached as Exhibit B. The initial analysis finds no new shading from a 350-foot project would be cast on any Recreation and Park Department properties or any of the other open spaces listed in Table IV.H-1 and analyzed in the DEIR. A 350-foot tower would cast some minor new shading on China Basin Park (a park under the jurisdiction of the Port of San Francisco) and the privately owned publically-accessible Willie Mays plaza in front of AT&T park during limited hours of the year. Both open spaces are outside the Plan area. As discussed in the DEIR, a detailed shadow analysis and compliance with Planning Code Sections 295 and 148 will be required for the proposed Project at any height, including 350 feet (or higher). (DEIR at IV.H-9 and -10).
- Wind. With respect to wind, the DEIR concluded that wind hazard criterion were not exceeded with existing plus Plan conditions in the area of the proposed Project. (DEIR at IV.G-11). Thus the proposed

Project, even assuming a 350 foot (or higher) height limit, would be unlikely to create wind hazards. Additionally, a detailed wind analysis specific to the Project will be completed for the Project's site specific CEQA analysis pursuant to DEIR Mitigation Measure M-WI-1, which requires further analysis of potential wind impacts for each tower proposal and compliance with the comfort criteria of Planning Code Section 148.

- Noise and Air Quality. The Project at 350 feet in height (or higher) would have similar noise and air quality impacts as a shorter building and be subject to the same Noise and Air Quality ordinances and Mitigation Measures that would reduce potential impacts to less-than-significant.

"Should the Planning Department believe that a 250-foot height limit for the Project site also be analyzed in the Final EIR, such a lower scale of development is already analyzed in the DEIR as an element of the Reduced Heights Alternative (see DEIR at Figure VI-1).

"Finally, the proposed height limit of 350 feet or higher better implements the policies of the Plan than a lower height limit. This is particularly true with respect to increasing the capacity for housing, one of the Plan's eight overall goals. Among the stated policies or objectives of the Plan are (1) increasing the area where space for housing can be built, (2) increasing how much space for housing can be built, and (3) increasing height limits on parcels. Each of these is better served by allowing increased height on the proposed Project, which allows for increased residential space.

"We appreciate the opportunity to present these comments, and to request that the FEIR be amended to incorporate them prior to certification."

Footnotes:

[1] DEIR at IV-22: "Substantial height increases would also be concentrated south of Bryant Street, from east of Fourth Street to Sixth Street. Many sites within this area would increase from the current height limit of 30-85 feet to 130-400 feet."

[2] Neither on-site building is a designated or eligible historic resource. DEIR at Figure IV.C-2.

(Steven L. Vettel, Solbach Property Group, Letter, February 13, 2017 [O-SPG.1])

Response PD-1

The comments address the 17,406-square-foot parcel located at 636–648 Fourth Street (northwest corner of Fourth and Bluxome streets) within the Plan Area. The comments state that a mixed-use project has been proposed for the parcel that includes a not less than 350-foot-tall tower containing not less than 392 dwelling units. Draft EIR p. IV-8 identifies the mixed-use project as a subsequent development project that would include a 350-foot-tall, primarily residential tower with 427 units. However, it also identifies a proposed height limit of 250 feet for the parcel per the proposed height map in Figure II-7, Proposed Plan Area Height and Bulk Districts, p. II-19. The commenter states that the Draft EIR is inadequate because it does not fully examine at least 350 feet as the preferred height limit for the project site; and requests that the Draft EIR incorporate the development project as it is described in the comment, along with the additional impact analysis.

The Draft EIR incorrectly included the project at 636–648 Fourth Street in a list, on p. IV-8, of Subsequent Development Projects "that would occur under the Plan, if approved." The development project described in the comment letter and in the list of Subsequent Development Projects in the Draft EIR would not be consistent with the Central SoMa Plan as proposed. With implementation of the Plan, the parcel described in the comment would have a 250-foot building height limit; as indicated by the comment, a 350-foot building height would not

be appropriate for the parcel. The Draft EIR analyzed development on a slightly larger site (620–648 Fourth Street) site at a height of ranging from 85 feet at Fourth and Bluxome streets to 250 feet at Fourth and Brannan streets, consistent with the Plan's proposed height and bulk map. It is noted that the project sponsor's September 4, 2015, environmental evaluation application includes a variant that would be consistent with the Plan. Accordingly, the fifth bulleted paragraph on Draft EIR p. IV-8 is revised as follows to replace the 350-foot-tall project with the 250-foot-tall variant (deleted text shown in ~~strikethrough~~; new text is double-underlined):

- 636–648 Fourth Street: The proposed project variant (to a non-Plan-compliant submittal) would include a ~~350~~250-foot-tall primarily residential tower with ~~427~~ approximately 270 units and approximately ~~3,200~~4,500 square feet of ground floor commercial space. Two existing one and two story commercial buildings and a general advertising billboard would be demolished.

If the Plan is approved as proposed, the 250-foot-tall project variant at 636–648 Fourth Street could be approved as consistent with the Plan, assuming that the Planning Department were to determine that the variant is consistent with the development density in the Plan. However, the 350-foot-tall proposal would require a site-specific re-zoning and an analysis of any environmental impacts associated with the project that were not otherwise described in the Draft EIR. It would be speculative to assume that a project in the Plan Area would be granted a site-specific rezoning for greater height immediately following adoption of the Plan. Therefore, the 350-foot-tall project is not considered reasonably foreseeable pursuant to CEQA Guidelines Section 15355 and was not included as part of the cumulative impact analysis.

Comment PD-2: Address Potential Maximum Building Heights and Potential Modified Massing Requirements

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

O-CSPO.9
O-CSPO.10
O-Tishman.1

"Page: **Comment:**

"II-22 Please ensure that the current draft Plan Implementation Measure 8.5.1.2 is addressed in the discussion of maximum building heights under this section. That measure provides that 'An additional 25 feet of height may be permitted on sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow.'

In addition, the first full paragraph in this section states that 'the project would allow for … five 160-foot buildings and about a half dozen buildings of 130 feet in height in the area south of Harrison Street… '

However, the Plan identifies at least nine areas south of Harrison Street that would be zoned 130-CS. These areas incorporate multiple parcels, and therefore development in this height range may not be

limited to 6 buildings." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.9])*

"**Page:** **Comment:**
"II-23 Objective 8.3 and Objective 8.4. These objectives address potential height limits and massing restrictions for development within the Plan area. To provide a more accurate scope for analysis, each should reference (l) the potential for modification of massing requirements on key development sites; and (2) the potential for an additional 25 feet in height on certain sites within the Plan area, as discussed in Objective 8.5." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.10])*

"**Page:** **Comment:**
"II-22 The first full paragraph on this page states 'the project would allow for … five 160-foot buildings and about a half a dozen buildings of 130 feet in height in the area south of Harrison Street…'

In discussing allowable development heights in this area, the DEIR should address draft Central SoMa Plan Implementation Measure 8.5.1.2, which states that 'An additional 25 feet of height may be permitted on sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow.' This could be done by referencing the DEIR discussion in Objective 8.5, which occurs on page II-23. It is feasible for the 598 Brannan Project may include buildings up to 185 feet in height along Brannan Street, and up to 155 feet in height along Bryant Street.

In addition, the draft Plan identifies at least 9 areas south of Harrison that would be zoned 130-CS. These areas incorporate multiple parcels, and many therefore contain [t]he capacity for development of more than the 'half a dozen' buildings of 130-feet or less that the DEIR indicates." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Tishman Speyer, Letter, February 13, 2017 [O-Tishman.1])*

Response PD-2

The comments state that the Draft EIR Chapter II, Project Description, should discuss the potential for an additional 25 feet in height on certain parcels in the Plan Area, should clarify the number of buildings that could reach 130 feet in height in the Plan Area, and should include the potential for modification of massing requirements pursuant to Objectives 8.3 and 8.4.

Additional 25 Feet in Height on Parcels in Plan Area

Regarding the potential for an additional 25 feet in permitted building height, this is discussed on Draft EIR p. II-23, where it states that the Plan "would provide greater flexibility for large development sites in return for improved design and additional public benefits." As further stated on p. II-23, this could mean that "an additional 25 feet of height would be allowed on sites where such flexibility in height would facilitate the provision of affordable housing and/or public open space beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow."

The potential for an additional 25 feet in height is not contained within the Plan's policy language (Part I of the Plan), but rather within the Plan's Implementation Strategy (Part II of the Plan). Specifically, Section A of Plan Part II, Implementation Matrix, lists implementation measures, implementation mechanisms, timelines, and responsibilities for implementation of the Plan's objectives and policies. Under Objective 8.5 ("Ensure that Large Development Sites Are Carefully Designed to Maximize Public Benefit") and Policy 8.5.1 ("Provide greater direction and flexibility for large development sites in return for improved design and additional public benefits"), Implementation Measure 8.5.1.2 states, "An additional 25 feet of height may be permitted on sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow."

In practice, this additional height is likely to be granted only to project sponsors with sites that are large enough to allow flexibility in site planning and building massing to allow for a portion of the site to be dedicated to affordable housing or park land beyond that otherwise required. For this reason, the potential for added height is included in the Plan's Implementation Matrix under Objective 8.5, which concerns large development sites. Objective 8.5 of the Plan states, "Central SoMa includes a number of large, underutilized sites (parcels or groups of adjacent parcels that are 30,000 to well over 100,000 square feet) that represent a substantial portion of the overall development in the Plan Area. Because of their size, these sites have the potential to deliver substantial public benefits if carefully designed." In addition to the Implementation Matrix, Part II of the Plan includes draft Key Development Site Guidelines (Section E of Part II), where the potential for an additional 25 feet in height is specifically identified for three larger sites in the Plan Area: Site 2, the "4th and Harrison" site; Site 5, the "Park Block"; and Site 7, "88 Bluxome/Tennis Club." It is not possible, in a programmatic analysis such as this EIR, to evaluate every potential design permutation that could be permitted under the Plan. Subsequent analysis of specific projects in the Plan Area would evaluate the potential for additional height on these sites, if applicable. However, as stated in the implementation measure, such additional height must not result in significant wind or shadow impacts. Any specific proposal that would increase the Plan's overall development potential or result in significant wind or shadow impacts would be ineligible for the 25-foot height limit increase. As noted, the additional 25 feet in height, while likely to be limited in application to larger sites, potentially could be granted in connection with any site where affordable housing or open space is proposed in excess of required amounts. For clarification, the third sentence of the paragraph of text following the heading introducing Objective 8.5 on Draft EIR p. II-23 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> ~~For example, a~~An additional 25 feet of height would be allowed on sites where such flexibility in height would facilitate the provision of affordable housing and/or public open space beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow.

See also Response WI-2 on p. RTC-215 and Response AE-1 on p. RTC-118 for discussion about potential effects of the 25 feet in added building height that may be possible on certain sites.

Clarification of Height Limits of 130 Feet and 160 Feet in the Plan Area

Regarding height limits of 130 feet and 160 feet, the fifth and sixth sentences of the first paragraph of text beneath the bullet list on Draft EIR p. II-22 are revised to clarify that certain height limits less than 200 feet would apply

to portions of the Plan Area and not to specific building sites. Revisions are as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

… In addition, the Plan would allow for:

- ~~five~~ four areas with a 160-foot height limit ~~buildings~~ and ~~about half a dozen buildings~~ seven areas with a height limit of 130 feet in height in the area south of ~~Harrison Street~~ the I-80 freeway;~~, as well as~~
- a 115-foot-tall building on the northwest corner of Brannan and Ritch Streets, between Third and Fourth Streets;~~. The project would also allow for~~
- four towers of 200, 240, 350, and 350 feet on the south side of Harrison Street between Second and Fourth streets (interspersed on the north side with a height limit of 130 feet and on the south side with height limits of 130 feet and 160 feet);~~ and~~
- towers of 200 feet on the northeast corner of Third and Harrison Streets and the northwest corner of Second and Harrison streets; and~~, as well as~~
- a 300-foot tower on the southwest corner of Fifth and Howard Streets, where the Tenderloin Neighborhood Development Corporation (TNDC) has proposed a residential project.

Potential Modification of Massing Requirements

Concerning the potential modification of massing requirements, the draft Key Development Site Guidelines (Section E of Part II of the Plan; see Figure 1, p. 171) identifies the potential for modification of Plan massing requirements for each of eight large sites for which the Plan provides guidance. These sites include Site 1, "5th and Howard"; Site 2, "4th and Harrison"; Site 3, "2nd and Harrison"; Site 4, "Flower Mart"; Site 5, "Park Block" (between Bryant and Brannan and Fourth and Fifth streets); Site 6, "Wells Fargo" (Brannan and Fourth streets); Site 7, "88 Bluxome/Tennis Club"; and Site 8, "4th and Townsend." As with the potential added height, it is unknown whether any of these sites would be granted modifications with respect to Plan massing requirements and in what manner, if any, the requirements would be altered. As such, it is not possible, in a programmatic analysis such as this EIR, to evaluate every potential design permutation that could be permitted under the Plan. Furthermore, subsequent development projects that are consistent with the development density in Central SoMa Plan would be required to undergo a project-level analysis, as applicable, to determine whether the proposed project would result in significant environmental effects that (1) are peculiar to the project or parcel on which the project is located; (2) were not analyzed as significant effects in the Central SoMa Plan EIR; (3) are potentially significant off-site or cumulative impacts which were not disclosed in the Central SoMa Plan EIR; or (4) are more severe than disclosed in the Central SoMa Plan EIR. Therefore, any project-specific significant effects resulting from an additional 25-foot height increase or a project's massing would be addressed during the environmental reviews of subsequent development projects, pursuant to CEQA Guidelines Section 15183.

Comment PD-3: Building Heights On and Near Flower Mart Site

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

I-Ferro, A.1

"I own properties on Sixth Street between Bryant and Brannan Streets and generally support height increases and more intensive use of the Central So Ma Plan area. However, review of the proposed project's land use and height/bulk limitations reflect several proposed projects. An example of this is the proposal to reclassify the height/bulk and use district of the Flower Market site from 40/55X to 270-CS and 160-CS, while the height of the adjacent parcels is proposed to be limited to 55' along Sixth and Bryant Streets, and the parcel at the north west corner of Bryant and Fifth Street is proposed to be changed to 85'." *(Angelo Ferro, Letter, January 26, 2017 [I-Ferro, A.1])*

Response PD-3

The comment includes a statement of support for the height increases and increased intensity of uses that would be implemented under the Plan. The comment appears to indicate some height and bulk limitations proposed within the Plan Area (along Sixth and Bryant streets and the parcel at the northwest corner of Bryant and Fifth streets) are not consistent with other parts of the Plan Area. As discussed on Draft EIR p. II-22, the Plan Area is currently characterized by mid-rise buildings. While the proposed changes to height and bulk limits proposed in the Plan seek to maintain this general character, the Plan would allow for approximately eight towers of between 200 and 400 feet in height on certain sites south of Bryant Street. These include three towers of between approximately 220 and 270 feet in height on the site of the existing San Francisco Flower Mart, which are the parcels to which the commenter is referring. While the 270-foot height limit that would be allowed for the Flower Mart site under the Plan would be taller than adjacent parcels to the north and across Brannan Street to the south, the height would be consistent with increased height limits proposed on nearby parcels along Fifth Street between Brannan and Townsend streets under the Plan. However, the comment pertains more to the merits of the Plan and does not address the adequacy or accuracy of the environmental analysis provided in the Draft EIR. Therefore, revisions to the Draft EIR to address the comment are not required. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PD-4: Folsom/Howard Streetscape Project Analysis Is Not Clear

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

O-SFRG-1.1
O-YBNC-Light-1.1
O–YBNC-Light-1.3

"After adoption of the City's Downtown Plan rezoning in 1995, SFRG [San Franciscans for Reasonable Growth] brought suit challenging the DTP's EIR legal adequacy. Following negotiations this case was settled several years later by agreement between SFRG and CCSF. I was a member of the SFRG board of directors at the time and a member of its negotiating team. The Settlement Agreement addressed three topics: future City EIR methodology for cumulative impact analyses (which was implemented), updating of the Seismic Safety Element of the City Master [Plan] (which was completed), and a commitment for the City to henceforth prepare 'readable' EIR's whose analyses could be readily understood by members of the general public with[out] technical backgrounds.

"In recent years the Department's standard for EIR's readability has clearly decayed in general, becoming progressively more technocratic in nature. But as detailed in the attached CSP DEIR comments by Alice Light, which are hereby included as comment here, the Central SOMA Plan's DEIR's discussion of the setting and impacts of its project-level-analysis of the Folsom/Howard Streetscape Project - several very complex alternative re-configurations of the traffic patterns for these and adjacent streets that could have huge practical impacts on the everyday lives of all SOMA residents - has crossed the line into sheer incomprehensibility. If not corrected, this will be a direction violation of the Settlement Agreement between the City and SFRG.

"To comply with the City/SFRG Agreement the CSP EIR discussion of the setting/impacts for the Folsom/Howard Streetscape Project must be completely rewritten as a discrete separate section of the EIR - a variant? - with all relevant information presented in maps and tables so as to be readily understandable by the general public without reference to other documents, such as the EIR Appendix." *(John Elberling, San Franciscans for Reasonable Growth, Letter, February 13, 2017 [O-SFRG-1.1])*

"The discussion of the Howard/Folsom street project in the DEIR is incomprehensible, and therefore inadequate. The convoluted and fractured way the information is presented makes it impossible for anyone who is not a transit engineer to understand.

"Figure 11-15 and Figure 11-16 are insufficient in depicting the consequences of the alternatives. They show the one-way and two-way proposals, but critical information is missing. Given the complexity and scope of the changes proposed, clear graphics are needed to consolidate and clearly present the changes and their impacts. As it is, the information is confusing and incomplete, broken up, and at times leaves out key information. It requires the reader to dissect various sections, compare them, and digest large amounts of information that should be clearly summarized in easy to understand graphics. *(Alice Light, The Yerba Buena Neighborhood Consortium, Letter, January 19, 2017 [O-YBNC-Light-1.1])*

"The proposed changes to Folsom and Howard need to be detailed in a single section with full graphic display of the impacts. Without that, we cannot understand what is going to happen to our neighborhood." *(Alice Light, The Yerba Buena Neighborhood Consortium, Letter, January 19, 2017 [O–YBNC–1.3])*

Response PD-4

The comments refer to San Franciscans for Reasonable Growth's (SFRG's) lawsuit challenging the adequacy of the City's Downtown Plan rezoning action adopted in 1995, and the resulting settlement agreement that addressed a provision requiring the City to provide readable EIRs with analyses that could be readily understood by members of the general public without technical backgrounds. The comments also state the Draft EIR's discussion of the proposed street network changes is in contradiction with the Settlement Agreement between the City and SFRG because it is not easily understandable to the reader, and that the Draft EIR should be revised to present the setting and analysis of the proposed street network changes in a stand-alone section. The comments express concern over the clarity of the graphics presented in the EIR for the Howard and Folsom streets network changes. The comments contend that Figure II-15, Howard/Folsom One-Way Option: Existing and Proposed Number of Travel Lanes, p. II-36, and Figure II-16, Howard/Folsom Two-Way Option: Existing and Proposed Number of Travel Lanes, p. II-37, are insufficient to illustrate the proposed network changes.

The Initial Study for the Plan included a number of figures to illustrate the proposed street network changes. During preparation of the Draft EIR, these figures were moved to Appendix F specifically to aid the reader in understanding the Draft EIR's project description, which could then be read without interruption of multiple pages of figures. The Draft EIR adequately identifies the potential impacts of the proposed street network changes as they relate to each of the nine individual category evaluations in the Transportation and Circulation section: Vehicle Miles Traveled (VMT) Impacts, Traffic Impacts, Transit Impacts, Pedestrian Impacts, Bicycle Impacts, Loading Impacts, Parking Impacts, Emergency Vehicle Access Impacts, and Construction-Related Transportation Impacts. The Draft EIR setting/impact analysis is not separated out by the individual components of the Plan, but addresses the entire action proposed under the Plan, which aids the reader's review of the impact analysis for each of the nine individual categories because it is located in the same place in the document. The Draft EIR's Table of Contents on p. vi lists Appendix F as including Proposed Street Network Changes Detail Drawings. However, to clarify this point, the first paragraph on Draft EIR p. II-35 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> The street network changes described below represent major investments that would be implemented gradually over time. Reconfigurations to street operations (such as conversion from one-way to two-way operation, installation of transit and bicycle facilities, and changes in the number of travel lanes) could be initially implemented on a street-by-street or block-by-block basis using roadway striping, traffic signal modifications, corner bulb-outs, and other low-cost tools. However, sidewalk widening (and the removal of some on-street parking in order to widen sidewalks) is a more substantial capital expense, and therefore sidewalk widening is expected to be implemented gradually as funding becomes available over time. In addition, some new developments would be required to widen sidewalks in front of their respective buildings per the City's Better Streets Plan. On blocks without development opportunity sites, sidewalk widening may need to be undertaken by the City, and would have to be prioritized among other transportation funding priorities. A complete set of figures illustrating the proposed street network changes is included in Draft EIR Appendix F.

The comments do not state what further graphics are needed and/or what other text changes should be made to aid comprehension of the proposed changes to Folsom and Howard streets. Therefore, no changes are possible or warranted.

Comment PD-5: Impact of Plan on Production, Distribution, and Repair (PDR) Uses

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

O-SOMCAN-Cabande.12

"**9. Consideration of Continued PDR Uses in Central SoMa is Inadequate**

"Page S-4 of the DEIR clearly indicates that Planning has not created an actual plan for Production, Distribution and Repair (PDR) uses in its vision for Central SoMa. This has historically been one of San Francisco's most important areas for PDR uses, which ensured a diversification of the economic base of the city and job opportunities for people with trade credentials, not just advanced university degrees.

"The DEIR indicates that it is removing 'protective zoning' for PDR, but there is no complete report of how much PDR has been lost since the implementation of the Eastern SoMa Plan, which was in part intended to protect against the loss of PDR. Creating 'incentives to fund, build, and protect PDR uses' is problematic since features that appear to be incentives today will quickly not be incentives tomorrow depending on land use, financial, and capitalization macro conditions that are driving the development market at any particular time.

"There are many innovative mixed-use building types, but the prospect of 'require(ing) PDR space as part of large commercial developments' seems to be a limited application. It would be important to understand what precedent there is for such a mix of uses in new developments and how likely it would be to have PDR on the ground level of a large commercial tower. What kind of PDR would it be? Who would be employed?

"For all PDR, we are concerned that there be increasing job opportunities for SoMa residents and diversification of San Francisco's economy. This will protect San Francisco against 'boom and bust' cycles; it will ensure that there is less regional impact on the environment that comes when sectors of the economy are segregated geographically; and will therefore result in less 'Vehicle Miles Traveled.'

"The Plan calls for adding technology jobs to SoMa, yet these jobs are largely inaccessible to existing community residents. SoMa needs a diversity of job types in the neighborhood that are not only accessible to community residents but provide a living wage that can support workers to stay in the neighborhood. This is highlighted especially in the types of jobs provided by production, distribution, and repair businesses that provide jobs for working class residents and are jobs that cannot afford to be lost. PDR businesses also provide essential support to other industries and sectors so should be proximate to those other functions for them to be viable and effective. More consideration of continued PDR use is required in the DEIR." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-*Cabande*.12])*

Response PD-5

The comments express concern regarding the loss of Production, Distribution, and Repair (PDR) uses under the proposed Plan. The comments question the effectiveness of the methods proposed to protect PDR uses in the Plan, including creating incentives to fund, build, and protect PDR uses and requiring large commercial developments to include PDR space. The comments also incorrectly assert that there is no report identifying the loss of PDR uses since implementation of the Eastern Neighborhoods Plan, as well as note the importance of protecting PDR uses to ensure diversification of San Francisco's economy and provide job opportunities for existing residents in Central SoMa.

Overall, these comments do not address the adequacy or accuracy of the Draft EIR. As such, the comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. Furthermore, Eastern Neighborhoods Monitoring Report 2011–2015 pp. 4 to 6 report on the loss of PDR uses since implementation of the Eastern Neighborhoods Plan.[11] A detailed list of implementation measures designed to protect PDR uses is also provided on Draft EIR p. II-14.

[11] San Francisco Planning Department, Eastern Neighborhoods Monitoring Reports 2011–2015, undated, *http://sf-planning.org/implementing-our-community-plans*, accessed August 5, 2017.

Concerning the comment addressing PDR jobs and VMT, see Response TR-3, p. RTC-139, which discusses VMT. As noted in Response TR-3, the relatively low VMT per person within the Plan Area means that overall regional VMT would be less for a given number of new jobs in the Plan Area, compared to the same amount of employment growth elsewhere in the Bay Area.

Comment PD-6: Initial Study Describes a Different Project than the Draft EIR and the Initial Study Is Inadequate

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

O-CSN-1.9
O-CSN-1.41
O-CSN-1.43
O-CSN-1.7
O-CSN-2.2
I-Margarita.2

"**V. THE EIR AND INITIAL STUDY HAVE AN INCONSISTENT AND INADEQUATE PROJECT DESCRIPTION.**

"**A. Initial Study is Inadequate Because it Describes an Entirely Different Project than in the DEIR.**

"The Initial Study is patently inadequate because it describes an entirely different project from the Plan set forth in the DEIR. The Initial Study must accurately describe the Project in order to identify impacts to be analyzed in the EIR. The Initial Study fails to perform this task because it does not describe the Plan at all. The Initial Study was prepared in 2014. It describes a rectangular project area that extends from Market Street to Townsend and from Second Street to Sixth Street. The Plan set forth in the DEIR is entirely different, with most of the three blocks from Market Street to Folsom excluded from the Plan area. Clearly the Plan will have entirely different impacts than the project described in the Initial Study in all respects, including, but not limited to, traffic, air quality, pedestrian safety, jobs-housing balance, etc. A new initial study is required to analyze the Project actually proposed by the City and to identify impacts requiring analysis in an EIR. The DEIR relies on the Initial Study to conclude that eleven environmental impacts are less than significant. This makes no sense. The City may not rely on an Initial Study prepared for one project to conclude that a very different project has less than significant impacts. (See, Terrell Watt, AICP, Comments).

"The purpose of an initial study is to briefly describe the proposed project and its impacts, and to identify significant impacts requiring analysis in an EIR. 14 CCR §15063. The initial study must contain an accurate description of the proposed project. 14 CCR §15063(d), 15071(a); *Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180. For example, in *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (2013), the court found an initial study to be inadequate because it did not disclose the number of football games to be held at a proposed stadium and it was therefore impossible to calculate the amount of traffic that would be generated by the project. ('Without a reasonable determination of the expected attendance at Hoover evening football games on completion of the Project, District may be unable to adequately

compare the baseline attendance to expected attendance in determining whether there is a fair argument the Project may have a significant impact on traffic and/or parking.n22 (Guidelines, §§ 15125, subd. (a), 15126.2, subd. (a); *Communities*, at p. 320 & fn. 5.)')

"The project description must include a description of the environmental setting of the Project. A CEQA document 'must include a description of the environment in the vicinity of the project, as it exists before the commencement of the project, from both a local and a regional perspective.' 14 CCR § 15125; see *Environmental Planning and Info. Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354. 'An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient [CEQA document].' *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (initial study must describe baseline conditions).

"[T]he Guidelines contemplate that 'only one initial study need be prepared for a project. If a project is modified after the study has been prepared, the [lead] agency need not prepare a second initial study.' *Gentry v. City of Murrieta*, 36 Cal. App. 4th 1359, 1384 (1995), citing, 1 Kostka & Zischke, supra, § 6.15, at p. 263; see also *Uhler v. City of Encinitas* (1991) 227 Cal. App. 3d 795, 803, disapproved on other grounds in *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal. App. 4th 1597, 1603; Guidelines, § 15063, subd. (a), 15070. However, when changes are made to a project after the initial study, the agency must have substantial evidence to show that the changes are not significant. *Building Code Action v. Energy Resources Conservation & Dev. Com*., 102 Cal. App. 3d 577, 592 (1980). The City lacks substantial evidence to support its conclusion that a second initial study is not required.

"**1. The DEIR Project Has a Vastly Different Geographic Scope, Populations and Jobs Projections, and Other Elements than the Initial Study.**

"In this case, the 2014 Initial Study does not describe the Project at all. It describes an entirely different project with different project boundaries that is 11 square blocks larger than the Project set forth in the EIR. The project described in the Initial Study clearly has a different baseline than the Project set forth in the EIR, including population, traffic, existing office space, transit ridership, pedestrian safety history, etc. The project described in the Initial Study will also have different impacts in all respects from the Project set forth in the EIR. The Initial Study therefore fails to perform its basic function to describe the Project and its impacts and to identify issues requiring study in the EIR.

"Urban Planner Terrell Watt, AICP, describes major differences between the various iterations of the project description. (Watt Comment, p. 5). Growth assumptions in the DEIR, Initial Study and Central SOMA Plan are vastly different:

> Table IV-1, Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ('buildout year' or 'planning horizon'). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. DEIR at page IV-5.
>
> Growth projected in the Initial Study includes up to 13,200 housing units (IS at page 85) and 56,400 new jobs (IS at page 81). In contrast, the Central SOMA Plan states: 'With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing.' Central SOMA Plan at page 7. The Financial Analysis of San Francisco's

> Central Soma Plan[12] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: 'The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years.'

"Clearly, the population, jobs and growth projections are entirely inconsistent throughout the environmental analysis. Will the Plan results in 7,500 housing units (Central SOMA Plan, p.7), or 14,400 (DEIR, p. IV-5), or 13,200 (IS, p. 85)? Will it create 40,000 new jobs (Financial Analysis), or 63,600 jobs (DEIR, p. IV-5), or 56,400 jobs (IS, p. 81)? Since these figures are fundamental to analysis of almost all other impacts (air pollution, traffic, public services, etc.), this wildly inconsistent project description renders the entire CEQA analysis inadequate. The City simply cannot rely on an Initial Study that assumed 56,400 new jobs, to conclude that a Plan that creates 63,600 new jobs has insignificant impacts.

"**2. The DEIR Project Has Entirely Different Goals than the Initial Study.**

"Also, the project described in the Initial Study has very different project goals.

> The Initial Study project has five project goals:
>
> 1. Support transit-oriented growth, particularly workplace growth, in the Central SoMa area.
>
> 2. Shape the Central SoMa's urban form recognizing both city and neighborhood contexts.
>
> 3. Maintain the Central SoMa's vibrant economic and physical diversity.
>
> 4. Support growth with improved streets, additional open space, and other elements of 'complete communities.'
>
> 5. Create a model of sustainable growth.

"(Central SOMA Plan Initial Study, p.3, http://sfmea.sfplanning.org/2011.1356E_IS.pdf).

"By contrast, the DEIR Project has eight very different goals:

> 1. Increase the capacity for jobs and housing;
>
> 2. Maintain the diversity of residents;
>
> 3. Facilitate an economically diversified and lively jobs center;
>
> 4. Provide safe and convenient transportation that prioritizes walking, bicycling, and transit;
>
> 5. Offer an abundance of parks and recreational opportunities;
>
> 6. Create an environmentally sustainable and resilient neighborhood;
>
> 7. Preserve and celebrate the neighborhood's cultural heritage; and
>
> 8. Ensure that new buildings enhance the character of the neighborhood and the city.

"(Central SOMA DEIR, p. S-2, http://sfmea.sfplanning.org/CentralSoMaPlanDEIR_2016-12-14.pdf).

"Nowhere does the DEIR explain why the Project goals were so dramatically changed. Nor does the DEIR explain why the Project boundaries were so drastically altered. Clearly, the two projects are entirely different

given that the basic project goals differ. A new Initial Study is therefore required to properly describe the Project and its impacts and to identify issues for analysis in a recirculated draft EIR.

"**3. The DEIR Eliminates the Mid-Rise Option that was Favored by the Central Corridor Plan.**

"The DEIR also differs from the 2013 Draft Central Corridor Plan in that it eliminate[s] the "mid-rise" height limit option (Option A); this option is considered in this EIR as the Reduced Heights Alternative.' (DEIR p. II-4). The Mid-Rise Option limited building heights to no more than 130 feet throughout most of the plan area. By contrast, the DEIR Project allows building heights of 350 feet or more at many areas that were formerly limited. This is a drastic change from the Initial Study and Central Corridor Plan since those prior documents strongly favored the Mid-Rise Option. Indeed, in 2013 when the Plan was known as the Central Corridor Plan, City Planning staff articulated all of the right reasons for supporting the Mid-Rise Alternative. The Central Corridor Plan stated:

> Urban design experience shows that people feel most comfortable on urban streets where the height of buildings is between ¾ and 1 ¼ times the width of the street, creating an 'urban room' that has a pleasing, but not overwhelming, sense of enclosure and intimacy. The Plan proposes that the base height limits along all major streets in the Plan area should be 85 feet, lowering to 65 feet toward the western edge of the Plan area and in historic areas, such as the South End and near South Park. While in some areas the Plan proposes to allow buildings to rise above the 85-foot base height (generally to 130 feet), these upper stories would be required to set back by at least 15 feet in order to maintain the perception of the lower streetwall…. This scale is also consistent with both the traditional form and character of SoMa's significant commercial and industrial buildings as well as aligning with the desire for larger floorplate, open floorplan, mid-rise buildings most desired by contemporary new economy companies.[13]
>
> PRINCIPLE 2: ***The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.***
>
> The South of Market sits at a critical location in the city's landscape. SoMa is a large expanse of flat land at the center of the east side of the City, sitting as an important balance and counterpoint to the dramatic hills that surround it, including the man-made 'hill' of the downtown high-rise district, creating a dramatic amphitheater.
>
> With relatively low buildings in comparison to the hills and high-rises around it, the South of Market allows expansive and cherished views to extend across it to and from the surrounding hills, districts and the major features of the region beyond. In order to preserve this essential characteristic and preserve views across the area, height limits taller than 130 feet are generally kept to the southern portion of the Plan Area (Brannan Street southward), limited in distribution and widely spaced. It is important to note that mid-rise buildings are not necessarily synchronous with low densities… Because the number of potential buildings taller than 130 feet is limited to strategic locations adjacent to transit stations and their locations generously spaced, these buildings will be prominent from all directions and serve as local landmarks.[14]"

Footnotes:

[12] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

[13] Central Corridor Plan, p. 30.

[14] Id. p. 32.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.9])

"The Project (Plan) is described in many different documents and in each differently. Thus, it is difficult to fully understand the Project and impossible for the DEIR to adequately analyze the Project. Making it even more challenging to get a clear understanding of the Project are the numerous plan provisions that provide flexibility for future development of the Project Area such as transfer of development rights and state density bonus law as well as other considerations that could allow more development in the Area than reflected in the Project description or impact discussions. For these and other reasons below, there is no complete, stable and finite description of the Project (Plan) to guide the DEIR's analysis of impacts." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.41])*

"A. The DEIR Provides an Incomplete and Inconsistent Description of the Project and the Project Setting (Baseline)

"A fundamental requirement of CEQA is that an EIR contain an accurate and complete project description. Without a complete project description, an agency and the public cannot be assured that all the project's environmental impacts have been revealed and mitigated. Further, CEQA and the CEQA Guidelines mandate that an EIR include a description of the 'physical environmental conditions . . . from both a local and a regional perspective. . . Knowledge of the regional setting is critical to the assessment of environmental impacts.' CEQA Guidelines Section 15125(a) and (c). This requirement derives from the principle that without an adequate description of the project's local and regional context, the EIR – and thus the decision makers, agencies and public who rely on the EIR – cannot accurately assess the potentially significant impacts of the proposed Project.

"The Project in this case is the Central SOMA Plan (formerly the Central Corridor Plan), which purports to be a comprehensive plan for the area including important local and regional transit lines and hubs connecting Central SOMA to adjacent neighborhoods including Downtown, Mission Bay, Rincon Hill, Mission District as well as the broader region via freeways and the light rail that will link to the Caltrain Depot. The Plan's goals are laudatory including Central SOMA becoming a sustainable neighborhood, accommodating anticipated population and job growth, providing public benefits including parks and recreation, respecting and enhancing neighborhood character, preserving the neighborhoods cultural heritage, and maintaining the diversity of residents. DEIR at page S-1 and Goals S-2. Unfortunately, the Project's approach to achieving these goals -- including but not limited to emphasizing office uses, increasing heights throughout the neighborhood, and removing restrictions in the current Central Corridor Plan, accepting in-lieu and community benefits fees instead of requiring new parks, affordable housing and essential services and infrastructure be provided in the Plan Area concurrent with or prior to non-residential and market rate development -- will result in significant impacts to the Central SOMA Neighborhood and take the community farther from these goals.

"1. Incomplete and Inconsistent Project Description

"CEQA requires an EIR to be based on an accurate, stable and finite project description: 'An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.' *County of Inyo v. City of Los Angeles* (1977), 71 Cal.App.3d 185. The DEIR lacks a complete and consistent description of the Project in numerous respects.

"First, the DEIR relies on the Initial Study for the analysis of 11 environmental topics even though the DEIR and Initial Study contain two distinctly different descriptions of the Project. The Initial Study was published on February 12, 2014 (Appendix B to the DEIR). According to the DEIR, based on the Initial Study, the Project (Plan) could not result in significant environmental impacts for the following topics:

- Population and Housing
- Greenhouse Gas Emissions
- Recreation
- Utilities and Service Systems (except for wastewater treatment and storm drainage addressed in the DEIR)
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality (except for sewer system operations and sea level rise addressed in the DEIR)
- Hazardous Materials
- Mineral and Energy Resources
- Agricultural Resources

"See DEIR at page I-2. Based on the Initial Study, the DEIR provides no further substantive analysis of these impacts despite significant changes to the Project (Plan) summarized below.

"The DEIR explains:

> 'Because the Initial Study analysis was based on a previous draft of the Plan circulated for review in 2013, the current 2016 draft of the Plan has been reviewed to ensure the Initial Study's conclusions reached on the 2013 draft remain valid. No new information related to the draft 2016 Plan has come to light that would necessitate changing any of the Initial Study's significance conclusions reached for the 11 topics that would be less than significant or less than significant with mitigation measures, which are included in the topical sections of Chapter IV, Environmental Setting, Impacts and Mitigation Measures, of this EIR. **As such, no further environmental analysis of these Initial Study topics is required in this EIR.' [emphasis added].**

"This approach is fatally flawed since the 2014 Initial Study does not describe the current proposed Project (Plan) that is the subject of the DEIR. In addition to completely different project boundaries,[8] the Initial Study describes an entirely different project with respect to baseline (setting) than the current Project (Plan), and Project in terms of growth, employment and housing. Baseline data in the Initial Study is woefully out of date with respect to population and housing, traffic, air pollution as well as regional conditions. Also, the project described in the Initial Study has very different project goals. The Initial Study project has five goals:

1. Support transit-oriented growth, particularly workplace growth, in the Central Soma area.
2. Shape the Central SoMa's urban form recognizing both City and neighborhood contexts.
3. Maintain the Central SoMa's vibrant economic and physical diversity.

4. Support growth with improved streets, additional open space, and other elements of 'complete communities.'
5. Create a model of sustainable growth.

"By contrast, the DEIR Project has eight goals:

1. Increase the Capacity for Jobs and Housing
2. Maintain the Diversity of Residents
3. Facilitate an Economically Diversified and Lively Jobs Center
4. Provide Safe and Convenient Transportation that Prioritizes Walking, Bicycling and Transit
5. Offer an Abundance of Parks and Recreational Opportunities
6. Create an Environmentally Sustainable and Resilient Neighborhood
7. Preserve and Celebrate the Neighborhood's Cultural Heritage
8. Ensure that New Buildings Enhance the Character of the Neighborhood and the City

"The Projects described respectively in the Initial Study and DEIR are entirely different given that the basic project goals are plainly different in respects that implicate substantively different physical and policy objectives.

"Second and compounding the situation is that almost no two descriptions of the Project are the same in the documents in the Project record (e.g., Central SOMA Plan, DEIR, Initial Study, Policy Papers, Financial Analysis). Topical sections of the DEIR thus are based on inconsistent descriptions of the Project. Examples include, but are not limited to, the growth assumptions that are essential to accurately analyzing Project impacts across all environmental topics. Growth assumptions in the DEIR, Initial Study, Central SOMA Plan and Financial Analysis are vastly different:

> Table IV-1 [DEIR], Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ('buildout year' or 'planning horizon'). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. DEIR at page IV-5.
>
> Growth projected in the Initial Study includes up to 13,200 housing units (IS at page 85) and 56,400 new jobs (IS at page 81). In contrast, the Central SOMA Plan states: 'With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing.'
>
> Central SOMA Plan at page 7. The Financial Analysis of San Francisco's Central Soma Plan[9] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: 'The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years.'

"Different growth assumptions are but one example of vastly different Project description information throughout the DEIR record. A revised DEIR must be completed with topical discussions based on a complete,

finite and stable description of the Project. Ideally, the revised DEIR would be preceded by a revised NOP and Initial Study so that all descriptions of the Project in the record are the same.

"Finally, the Project Description section of the DEIR is incomplete and lacks details critical to supporting adequate impact analyses including but not limited to information about the type of housing and jobs the Project will allow. To compensate for the lack of detail, some topical discussions essentially create Project description details to support analysis. Examples include the spatial representation of growth in the Shadow analysis, TAZ detail in the Transportation section and the prototypical development projects invented in the Financial Analysis. These more detailed topical representations of the Project also vary from one another. A revised DEIR with a complete description of the Project is essential to support revised topical analyses. The revised Project description should also describe in detail the policy and financial (community benefits) proposals in the Plan that the DEIR and Initial Study rely on to reach conclusions concerning impact significance. For example, the DEIR and Initial Study conclude that impacts associated with displacement of units and households will be less than significant based on a suite of affordable housing programs that purportedly will offset what otherwise would be a significant impact. (e.g., Project Area tailored fees, offset requirements, among others included in the proposed community benefits program for the Project and in the Plan). These are not described in the Project description, nor is there any analysis to demonstrate exactly how these programs and fees will result in mitigating Project impacts associated with growth inducement and jobs-housing imbalance, among other significant impacts of the Project."

Footnotes:

[8] The Initial Study describes a rectangular project area that extends from Market Street to Townsend and from Second Street to Sixth Street. The Central SOMA Plan and DEIR exclude about 11 square blocks and therefore completely different assumptions concerning growth and development, among other fundamental differences in Project description.

[9] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.43])

"The Central SoMa Plan (formerly, Central Corridor Plan) is a comprehensive plan for the area surrounding much of southern portion of the Central Subway transit line. The Plan Area includes roughly 230 acres that comprise 17 city blocks, as well as the streets and thoroughfares that connect SoMa to its adjacent neighborhoods: Downtown, Mission Bay, Rincon Hill, and the Mission District. The Plan Area is bounded by Second Street on the east, Sixth Street on the west, Townsend Street on the south, and by an irregular border that generally jogs along Folsom, Howard and Stevenson Streets to the north (see DEIR Figure II-1, Central SoMa Plan Area Boundaries, in Chapter II, Project Description).

"The Plan would fundamentally transform the Central SoMa area. It would ***triple*** the resident population of the area from a current population of 12,000 to 37,500[3] -- an increase of 25,500 additional residents. It would more than ***double*** employment in the area from a current level of 45,600 jobs to 109,200 -- an increase of 63,600 additional jobs. (DEIR, pp. IV-6, IV-5).

"For at least three years, the City presented a plan to the public that extended from Market Street to Townsend and from Second Street to Sixth Street. The plan was called the Central Corridor plan. The plan proposed a Mid-Rise option, in which almost all buildings would be capped at no more than 130 feet or less. The plan also

included a High-Rise option. Then, in late 2016, without explanation, the City drastically altered the plan, lopping off 11 blocks at the north from Folsom to Market (with a narrow exception from Fifth to Sixth Street). Critically, at the same time the City dropped the Mid-Rise option and included only the High-Rise option in the analysis. The Mid-Rise Option was relegated to a small section at the back of the alternatives analysis of the DEIR, and renamed the 'Reduced-Height Alternative. The City released the DEIR for the completely new project just before the Christmas and New Year holidays, on December 14, 2016."

Footnote:

[3] Actual current population is closer to 10,000, so the Plan will almost quadruple resident population. This points out the importance of using an accurate baseline population number.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.7])

"And I want to emphasize that this Draft EIR is a radical departure from a document issued by the Planning Department in 2013.

"In 2013, the Planning Department issued the Central Corridor Plan, which strongly favored the mid-rise alternative and said that the mid-rise character of the neighborhood should be retained.

"For some reason, in three short years, the Department is now favoring the high-rise alternative. And we think it's inappropriate and will -- for a marginal increase in jobs and housing, will deprive the neighborhood of the livability and the human scale that is essential to a mixed-use neighborhood. We don't want to see a second Financial District South of Market." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Hearing Transcript, January 26, 2017 [O-CSN-2.2])*

"As you're well aware, the Central Corridor Plan 2013 included changes to the Area Plan with two proposed alternative heights, a mid-rise option and a high-rise option. In the final Central SoMa Plan released last summer, the mid-rise option was erased without an explanation, and a significantly higher high-rise option was proposed.

"The proposed higher high-rise option directly catered to existing developer proposals on sites of their choosing, concentrating development in areas far from transit, for example, proposing 350-foot heights right along the highway south of Harrison Street. How does this make any sense?" *(Margarita, Hearing Transcript, January 26, 2017 [I-Margarita.2])*

Response PD-6

The comments generally refer to Draft EIR Chapter II, Project Description, and discuss differences between the Plan as described in the Initial Study (Draft EIR Appendix B) and the Draft EIR. The comments allege that the Draft EIR and the Initial Study are inadequate because the project description in each of these documents differs as to the geographic area of coverage and the project goals. In addition, the comments note that the growth projections in the Draft EIR, the Initial Study, and the Plan itself are different, and that the Plan and its accompanying financial analysis identify further different growth projections. The comments further state that the 2016 Central SoMa Plan analyzed in the Draft EIR differs substantially from the 2013 Central Corridor Plan, in that the 2013 Plan included both a mid-rise and a high-rise height option, while the 2016 Plan includes only

a single height and bulk map that is more akin to the earlier Plan's high-rise option. Additionally, the comments state that the project description lacks certain details, such as the type of housing and jobs to be permitted, and states that "some topical discussions essentially create Project description details to support analysis," such as the massing models used in Section IV.H, Shadow, and transportation analysis zone (TAZ) detail in Section IV.D, Transportation and Circulation. Comments also state that the Plan would allow for developer payment of in-lieu and community-benefits fees instead of requiring new parks. Finally, the comments state that the project description lacks a discussion of "policy and financial (community benefits) proposals in the Plan" that the Draft EIR and Initial Study rely on to determine that residential displacement would result in less-than-significant impacts.

First and foremost, the project description as analyzed in the Draft EIR and described beginning on Draft EIR p. II-7 includes some variations from the 2016 Plan. The Draft EIR clearly sets forth the project description analyzed in the EIR, including specific components that are not part of the 2016 Plan. For example, the project description in the Draft EIR analyzes higher heights on seven blocks than what the 2016 Plan proposes based on specific proposals from developers that would like the Plan to include even higher heights on certain sites. Therefore, the growth projections in the Draft EIR are different and greater than the Plan's growth projections.

Differences Between the 2013 Plan and the 2016 Plan

The following discussion examines the differences between the goals contained in the 2013 and 2016 Plans, as well as the differences between the geographic area covered by each Plan and the differences in growth projections as set forth in the Initial Study and the Draft EIR.

Difference Between Plan Goals Set Forth in the EIR and Initial Study

In terms of Plan goals, the comments inaccurately state that the "DEIR Project Has Entirely Different Goals than the Initial Study." The same underlying concepts and principles support both the 2013 and 2016 Plans, and the current draft Plan, which proposes to "accommodate growth, provide public benefits, and respect and enhance neighborhood character" (2016 Plan p. 5) is a refinement of the 2013 Plan, which aimed to "support transit-oriented growth" (2013 Plan Goal 1) while "respecting the rich context, character and community of SoMa, providing benefits for its existing residents and workers as well as the services needed for new ones, and growing sustainably" (2013 Plan p. 6). **Table RTC-2, Comparison of Goals, 2013 and 2016 Plan Drafts**, compares the goals of the 2013 and 2016 draft Plans side-by-side, along with explanatory text from each plan. While the precise wording and the order in which the goals are presented has changed between the 2013 Plan and the 2016 Plan, there is strong concordance between the objectives that support each draft of the Plan.

TABLE RTC-2 COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS

2013 Plan	2016 Plan
Goal 1: Support transit-oriented growth, particularly workplace growth, in the central corridor area. The Central Corridor area lies just south of Market Street, San Francisco's main drag, adjacent to existing centers of commerce, housing, and visitor activity in Downtown and Mission Bay. It is linked regionally and locally by a strong and diverse transportation network including BART, Caltrain, MUNI and the coming Central Subway. And it is already an area of demonstrated demand, in a part of SoMa that has seen more	**Goal 1: Increase the Capacity for Jobs and Housing** Central SoMa is an appropriate location for such development. The area is served by some of the region's best transit, including BART and Caltrain, Muni Metro and many bus lines, in addition to the Central Subway currently under construction. Flat streets and a regular grid pattern can make destinations easy to reach for people walking and bicycling (as facilitated by improvements discussed in Goal 4). There is already an incredibly strong cluster of technology companies that new and growing companies want

TABLE RTC-2 COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS

2013 Plan	2016 Plan
growth and economic activity than any other city neighborhood in the last ten years. From a location, transit, and market demand perspective, it is a logical growth center. Allowing a wide and flexible range of uses, increasing allowed densities, and strategically raising height limits are the Plan's key strategies to enable increased development potential. However, any increases in development capacity need to be balanced with other Plan goals - respecting the rich context, character and community of SoMa, providing benefits for its existing residents and workers as well as the services needed for new ones, and growing sustainably. [p. 6]	to locate near. There is also a diversity of other uses, including thousands of residential units, local- and regional-serving retail, cultural and entertainment facilities, hotels, and production/ distribution/repair businesses. Simultaneously, there is substantial opportunity to increase density in Central SoMa. There are numerous undeveloped or underdeveloped sites, such as surface parking lots and single-story commercial buildings. [p. 13] **Goal 3: Facilitate an Economically Diversified and Lively Jobs Center** Moving forward, Central SoMa is also well positioned to be a center for job growth. As discussed in Goal #1, it is well located, being served by some of the region's best transit and having a lot of developable land. Much of that demand will be for office-oriented jobs, particularly in the "knowledge-sector" industries that drive our economy. However, in allowing for that growth it is important that the neighborhood maintains and grows its other sectors to sustain its unique diversity of economic activities and the liveliness that SoMa is known for. [p. 35]
Goal 2: Shape the area's urban form recognizing both city and neighborhood contexts. As noted above, the Central Corridor area plays a significant role as a job hive, cultural center, and transit nexus in our city, but it also is a unique place with a rich history and a fabric of diverse buildings and mix of activities that give it its local and international dynamism. Famous for its brawny warehouses, eclectic mix of commercial buildings from throughout the 20th Century and fine-grained alleys, growth should reflect this character while accommodating the broader growing needs of tomorrow and the next generation. Urban design provides a tool to address overall neighborhood livability and character, particularly regarding the scale of the streetwall, lot fabric, sunlight to open space, and historic resources. This Plan sets forth a proposal for a mostly mid-rise district, based on an overall base height set by the width of the area's streets. The Plan uses a number of urban design strategies, from lowering heights to preventing lot mergers, to protect assets like existing open spaces, residential enclaves, small-scale neighborhood commercial clusters and historic districts. [p. 6]	**Goal 8: Ensure that New Buildings Enhance the Character of the Neighborhood and the City** While many existing residential, historic, public, and large commercial buildings in Central SoMa are likely to remain in the foreseeable future, there is also a substantial amount of land on which new development is likely to occur. New buildings and landscapes will change the neighborhood in many ways. The design of ground floors can control how interesting and safe a street will be for people walking. The size and massing of buildings as perceived from the street can be inviting if scaled appropriately, alienating if too small or too far removed, or intimidating if too large, looming or impervious. The collection of the buildings as viewed from the distance can either enhance or detract from the overall skyline and sense of the city's landscape. The architecture of a building can either engage people with intimate details and support a feeling of a cohesive and dynamic neighborhood or only coolly express its own internal interests without enriching its context. Within the existing neighborhood, there are already numerous good and bad examples for each of these issues. The goal of the Central SoMa Plan is to ensure that each new building enhances the character of the neighborhood and the city as a whole by having engaging ground floor, appropriate scale, great architecture and a beneficial contribution to the skyline. [p. 95] *Note: Objective 8.3 reads, "Reinforce the character of Central SoMa as a mid-rise district with tangible 'urban rooms.'"*
Goal 3: Maintain the area's vibrant economic and physical diversity. SoMa is one of the most vibrant areas of the city. The Central Corridor Plan Area incorporates an incredibly diverse cross-section of San Francisco's population, uses and buildings. Within the Plan Area there are multiple mini-neighborhoods where one use might be more predominant than others, numerous	**Goal 2: Maintain the Diversity of Residents** SoMa has an incredibly diverse population, in terms of race, income, and unit size. This diversity is a critical part of its neighborhood character. Respecting this neighborhood character requires that the variety provided by the existing residents should be maintained, and that future development would replicate this pattern to the highest degree possible. [p. 27]

TABLE RTC-2 COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS

2013 Plan	2016 Plan
communities with longstanding heritage in the area, and a wide range of residents, from singles to families, at a range of incomes. A key goal of this Plan is to maintain this vibrancy through land use strategies that support and build upon existing diversity, by protecting existing residential areas from major change or displacement, by fostering the continued mix of uses – offices, housing, retail, hotels, industrial, and entertainment -- sitting side by side, by preserving important historic buildings, and guiding the sensitive design of new ones. [p. 7]	**Goal 3: Facilitate an Economically Diversified and Lively Jobs Center** SoMa has been a commercial center for San Francisco for well over a century. Historically an industrial district, such businesses now sit cheek by jowl with offices, retail, hotels, and entertainment venues. This combination creates an environment that is both incredibly lively and unique in San Francisco. [p. 35]
Goal 4: Support growth with improved streets, additional open space, and other elements of "complete communities." The healthiest kind of neighborhood is one where people can live, work, move, and thrive. As a neighborhood that has been in transition for a number of years, SoMa still lacks many of the kinds of services and amenities that would make it a truly "complete" community for its residents and workers. For example, the Central Corridor area is currently served by a diverse set of public open spaces and facilities, particularly surrounding Yerba Buena Gardens. But the uneven distribution of these community assets leaves portions of the area underserved, and the Plan proposes a number of strategies to provide new public open space. Its large blocks, poor pedestrian conditions, few biking facilities and fast moving traffic are proposed to be transformed into complete streets that support walking, biking, and transit, and function as a welcoming component of public realm. In addition to public realm and circulation improvements that address the area's needs for physical infrastructure, the Plan also includes consideration of programs that can enhance access to community services, affordable housing and work opportunities. Impact fees will fund not just open space and street improvements, but also child care and library facilities. Increased housing requirements will expand the amount of affordable housing in the area, and citywide economic development tools will help broaden access to the area's jobs. [p. 8]	**Goal 5: Offer an Abundance of Parks and Recreational Opportunities** Central SoMa currently suffers from a shortage of public parks and recreational opportunities relative to number of residents, workers and visitors to the area. This is largely due to its industrial history. Within the Plan Area there is only one outdoor recreational space: South Park. There are also smaller indoor and outdoor passive spaces as well as private indoor gyms. There are also three large public facilities just outside the Plan Area that serve the people of Central SoMa: Yerba Buena Gardens, Gene Friend Recreation Center, and Victoria Manalo Draves Park. Given the superior public transit in Central SoMa, area residents have access to a broad range of other recreational opportunities in the city. However, given the length of blocks and limited number of facilities, substantial portions of the Plan Area lack easy access to playgrounds, public sports courts, and quiet spaces for more contemplative activities. By increasing the population in Central SoMa, the need for parks and recreational opportunities will only increase. Fortunately, the Central SoMa Plan presents an excellent opportunity to build new parks and recreational facilities, provide the funding to maintain them, and the activity to keep them well used. Seizing these opportunities will require dedicated and strategic focus. [p. 59] **Goal 4: Provide Safe and Convenient Transportation that Prioritizes Walking, Bicycling, and Transit** Central SoMa is served by a widely spaced grid of major streets that form large blocks, often subdivided by narrow streets and alleys in patterns that vary from block to block. While the narrow streets and alleys typically serve only very local needs, the continuous grid of major streets connects city neighborhoods and links the city to the region via I-80, I-280 and U.S. 101. The major streets in SoMa have multiple lanes, widely spaced traffic signals, and are often one-way – all strategies to move automobiles and trucks through the district at rapid speeds. While the existing street pattern still works for traffic circulation in off-peak hours, as traffic congestion has worsened over the decades, these streets are now often snarled with automobiles, trucks, transit, and taxis/ridesharing services. The resulting traffic is a substantial source of air and noise pollution and disproportionate rates of traffic injury, degrading the quality of life for residents, workers and visitors to the area. Whether at congested times or not, the present design of the major streets does not serve pedestrians well and will certainly not accommodate the pedestrian needs of the new residents, workers and visitors contemplated by this Plan. Design that primarily

TABLE RTC-2 COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS

2013 Plan	2016 Plan
	accommodates the needs of motor vehicles relegates the needs of people walking to a secondary status. The result is unsafe and unpleasant conditions for pedestrians: many sidewalks do not meet minimum city standards; signalized or even marked crosswalks are few and far between; many crosswalks at major intersections are closed to pedestrians; and long crossing distances increase exposure to traffic. The combination of high traffic speeds and volumes and poor pedestrian infrastructure is reflected in the high rate of pedestrian injuries seen throughout the Plan Area. The existing conditions are also quite poor for people riding bicycles, and discourage others from cycling in this neighborhood. On most streets, bicycles are expected to share lanes with much heavier and faster moving motor vehicles. Where bicycle lanes exist, they place cyclists between moving traffic and parked cars and do not protect cyclists from right-turning vehicles at intersections. Insufficient facilities for people riding bicycles are reflected in the high rate of injuries to bicyclists seen throughout the Plan Area. [p. 43]
Goal 5: Create a model of sustainable growth. At the same time that new growth adds demand to our water, energy and waste systems, state and local environmental goals mandate that we reduce greenhouse gas emissions, energy use and stormwater output. Eco-Districts provide a way of looking at water and energy conservation and waste reduction on a neighborhood or district level, by bringing neighbors, community institutions, and businesses together with the public sector to develop innovative projects to reduce the ecological footprint of the neighborhood. A pilot Eco-District in the Central Corridor can illustrate how a significant rezoning effort can be linked to sustainable growth. Several of the components planned for the Central Corridor can support Eco-District development – new infrastructure in the area can be designed to assist in achieving energy, water or ecosystem goals; new buildings can be designed to the highest level of environmental sustainability; and eco-friendly behavior can be supported by the Plan Area's new uses, improved streets, and new communities. [p. 8]	**Goal 6: Create an Environmentally Sustainable and Resilient Neighborhood** Central SoMa is poised to become a truly sustainable (healthy, green, efficient), resilient, and regenerative neighborhood—an "Eco-District" where urban development gives more to the environment than it takes. In such a community, buildings use 100 percent greenhouse gas-free energy (much of it generated within the neighborhood); carbon emissions and fossil fuels are completely eliminated; non-potable water is captured, treated, and re-used within the district to conserve potable water and eliminate waste; nature is a daily experience, with greening and biodiversity thriving on streets, buildings, and parks; and zero solid waste is sent to the landfill. To achieve this bold vision, the Central SoMa "Eco-District" is committed to advancing livability and environmental performance through innovative and neighborhood-scale systems, projects, and programs. Creative partnerships between residents, organizations, businesses, and government entities help ensure sustainability targets are achieved and progress is tracked over time. The results will be palpable to the daily experiences of people living, working, and visiting the neighborhood, and will place Central SoMa at the forefront of action on global climate change. [p. 69]
Chapter 6 – Historic Resources & Social Heritage SoMa has developed an eclectic mix of commerce, industry, and increasingly, entertainment and residential living spaces. Within this diverse mix of land uses, SoMa and the Central Corridor Area is distinguished by the existence of individually significant properties. Within the Central Corridor Area Plan there are a number of City Landmarks, generally in the northern edge of the Plan Area, including St. Patrick's Church (Landmark No. 4), the Jessie Street Substation (Landmark No. 87), and the Old U.S. Mint (Landmark No. 236), and one locally-designated historic district, the South End Historic District. Various other significant properties and districts relating to the Filipino and gay "leather" communities have been identified through informational surveys	**Goal 7: Preserve and Celebrate the Neighborhood's Cultural Heritage** SoMa has … developed an eclectic mix of commerce, industry, and increasingly, entertainment and residential living spaces. Within this diverse mix of land uses, there are historically and culturally significant properties and districts. SoMa is an important center for two culturally important communities: Filipinos and the lesbian, gay, bisexual, transgender, and queer (LGBTQ) community. SoMa is home to the largest concentration of Filipinos in San Francisco, and is the cultural center of the regional Filipino community. The Filipino community has deep roots in the neighborhood, beginning in the 1920s and becoming a predominant presence in the 1960s. The LGBTQ community also has a long-standing presence in SoMa. By 1956, the two most prominent national

TABLE RTC-2 COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS

2013 Plan	2016 Plan
and inventories within the boundaries of the Central Corridor Plan Area. The Plan Area's built fabric, and the social role of those buildings, play a key role in its unique character. The historic preservation objectives and policies of the Central Corridor Plan provide for identification, retention, reuse, and sustainability of these unique properties. As the area changes and develops, historic features and key properties that define it should not be lost or their significance diminished through demolition or inappropriate alterations. New construction in designated historic districts should respect and relate to their contexts. The Plan supports sound treatment of historic resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, encourages rehabilitation of resources for new compatible uses, and it allows for incentives for qualifying historic projects. [p. 82]	organizations dedicated to improving the social status of gays and lesbians were both headquartered within the Central SoMa. Beginning after World War II and to present day, various LGBTQ-oriented business establishments have located to SoMa's industrial areas. The Plan Area's cultural heritage is a valuable historical, social, and economic resource that requires thoughtful management to safeguard the city's unique identity and to ensure a high quality-of-life for its current and future inhabitants. Retaining the city's architectural heritage builds an inimitable sense of place and a tangible connection to its past. Sustaining the traditions, businesses, arts, and practices that compose San Francisco's social and economic fabric preserves experiences that can be shared across generations. And, protecting the city's archeological sites and artifacts provides increasing insight into the story of its past inhabitants. Conservation of our cultural heritage encourages a deeper awareness of our shared and multi-faceted history while facilitating sustainable economic development. As the area changes and develops, key elements of the historic built environment should not be lost or diminished through demolition or inappropriate alterations. The City supports preservation and sustainable rehabilitation of historic resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties and encourages the introduction of new compatible uses, and allows for preservation incentives for qualifying projects. Moreover, new construction in identified historic districts should respect and relate to its architectural context. The City also supports stabilization, promotion, and increased visibility of the area's living heritage, which includes businesses, organizations, traditions, and practices associated with the Filipino and LGBTQ communities. [p. 84]

As shown above, the 2016 Plan merely repackages and rewords the primary goals of the 2013 Plan. The overall intent of the Plan goals, as they may relate to physical environmental effects, remains the same. The change in the wording of Plan goals between publication of the Initial Study and publication of the Draft EIR does not result in any inadequacy in either document, does not set forth substantial new information, and does not require recirculation of either the Initial Study or the Draft EIR.

Difference in the Geographic Area of the Plan Between the Draft EIR and Initial Study

As noted in the comments, the 2013 draft Central Corridor Plan analyzed in the Initial Study encompassed the 28-block area from Market Street south to Townsend Street, between Second and Sixth streets. As currently proposed and as set forth in the Draft EIR, the 2016 draft Central SoMa Plan includes all or parts of 17 city blocks bounded by Second Street on the east, Sixth Street on the west, Townsend Street on the south, and an irregular border that generally jogs along Folsom, Howard, and Stevenson streets to the north. The change in geographical extent between the 2013 Plan and the 2016 Plan equals the removal of about 35 percent of the 2013 Plan at its northernmost portion.

The areas within the 2016 Plan are all part of the Eastern Neighborhoods Plan Area (including East SoMa and Western SoMa). By contrast, the areas removed from the 2016 Plan are outside of the Eastern Neighborhoods

Plan Area, the vast majority of which are in the Downtown Plan Area and zoned one of four C-3 (Downtown Commercial) Use Districts. The exceptions include five parcels near the northwest corner of Fifth and Howard streets;[12] a single large parcel zoned RC-4 (Residential-Commercial, High-Density) in the block bounded by Howard, Fourth, Folsom, and Fifth streets; and two sites zoned for P (Public) use—the Old Mint at Fifth and Mission streets and the Fifth and Mission Parking Garage.

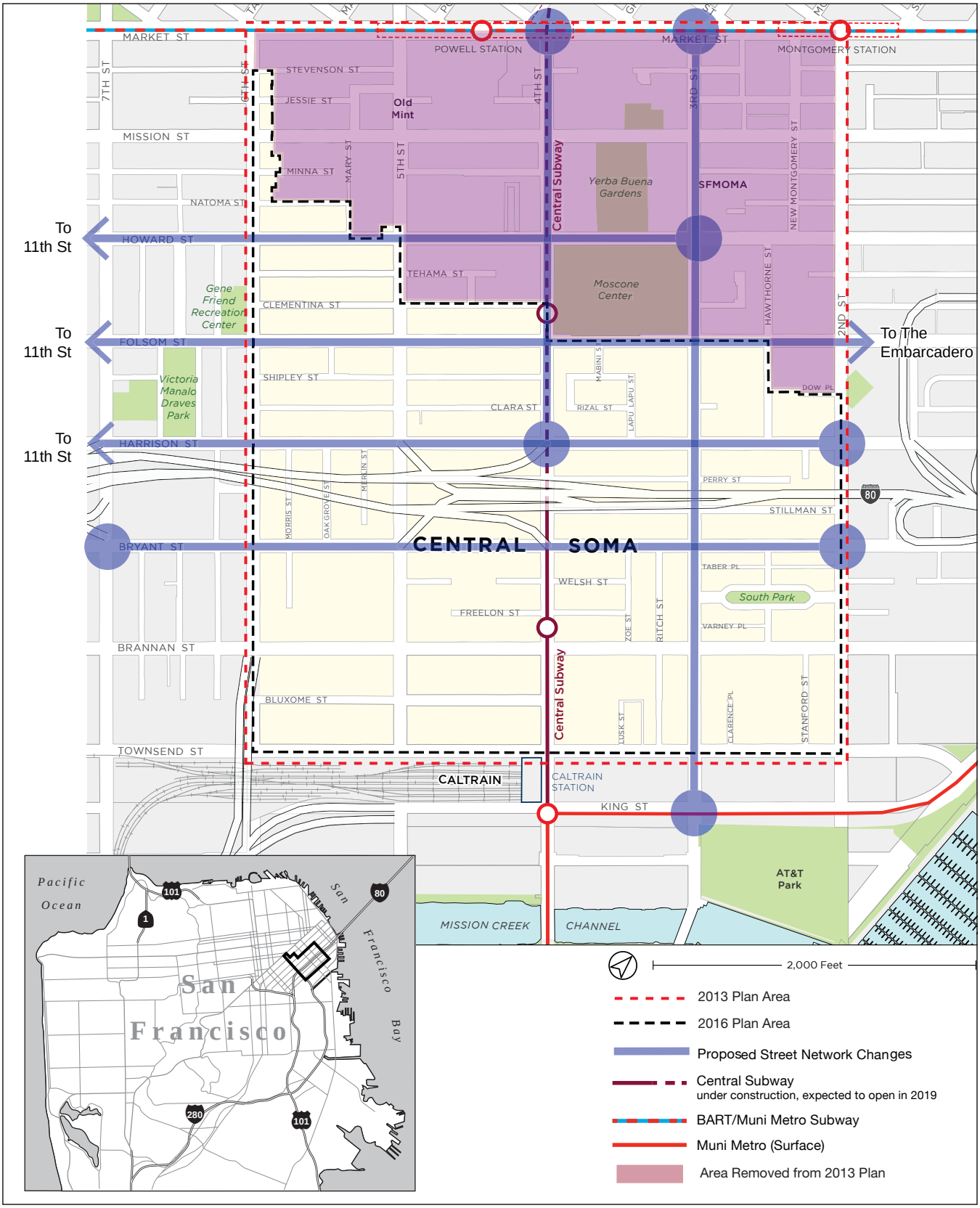
Under the 2013 Plan, none of the parcels outside of the Eastern Neighborhoods Plan Area were proposed for rezoning to a different use district, with the exception of the RC-4 parcel, occupied by three affordable housing buildings owned and operated by TODCO and the Tenderloin Neighborhood Development Corporation, which was proposed for rezoning to C-3-S (Downtown Commercial Support) for consistency with the surrounding area. However, this zoning revision was not anticipated to result in any physical change or change in use, given that TODCO's mission is the provision of affordable housing and enhancing socioeconomic conditions for the poor, disadvantaged, and working-class people in SoMa. Moreover, should this site be sold in the future, the regulatory constraints to removal or demolition of affordable residential units in San Francisco would limit potential changes. Moreover, no changes in height limits were proposed under the 2013 Plan on any of the parcels now no longer within the 2016 Plan Area, save for a *decrease* in height limit that had been proposed on the blocks occupied by the Moscone Convention Center. Accordingly, while the Initial Study analyzed physical effects of development subsequent to the Plan in the approximately 30-acre area that is no longer included in the 2016 Plan, the 2013 Plan would not have substantially increased the foreseeable amount of development in this area because the 2013 Plan did not propose changes to use districts or height limits that would have the potential to increase the projected amount of development and this development could occur pursuant to existing zoning, whether or not the Plan is adopted. It is for these reasons that the Plan Area boundaries were modified in the 2016 Plan. The adoption of the 2013 Plan would not have facilitated any additional development that could not already occur on the parcels removed from the Plan Area (see **Figure RTC-4, Revision to Plan Area Boundaries**, p. RTC-67).

In light of the foregoing, the geographical change in the Plan Area between publication of the Initial Study and publication of the Draft EIR does not result in any inadequacy in either document, does not set forth substantial new information, and does not require recirculation of either the Initial Study or the Draft EIR.

Difference Between the Draft EIR and the Initial Study Growth Projections

As discussed in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, under Approach to Analysis on p. IV-5, and elsewhere in the Draft EIR, the Plan is a regulatory program, not a physical development project or set of development projects (other than changes to streets and potential open space improvements). The Plan, if adopted, would allow for accommodation of additional jobs and housing in the Plan Area, but would not result in direct physical changes. To analyze the potential indirect physical effects of a regulatory program, it is necessary to develop a set of reasonable assumptions concerning the future physical development that could be constructed under the proposed Plan. This is then compared with future development that could be constructed under the existing zoning and land use policies in the Plan Area. These assumptions are set forth in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, under

[12] These parcels, within a RSD (Residential/Service Mixed) Use District at the time the Initial Study was published, have since been rezoned to C-3-S (Downtown Commercial Support) as part of approval of the 5M Project (Case No. 2011.0409).



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure RTC-4

Revision to Plan Area Boundaries

Analysis Assumptions and Growth Assumptions beginning on Draft EIR p. IV-4. These assumptions are not part of the description of the proposed Plan; rather, they are the basis of the analysis of several Draft EIR topical sections, particularly those that require quantification of impacts related to the intensity of development, such as Transportation and Circulation, Noise and Vibration, and Air Quality, as well as the analysis in the Hydrology section of combined sewer discharges as a result of increases in Plan Area wastewater generation. Each of these issues was analyzed in the Draft EIR. Other topics that incorporate quantification related to the intensity of development that were analyzed in the Initial Study include Recreation, Utilities and Service Systems, and Public Services.

As described on Draft EIR p. IV-5, the Draft EIR growth forecasts are based on the Planning Department's citywide allocation of Association of Bay Area Governments' (ABAG) growth projections. The ABAG projections are developed as part of the regional planning process undertaken by ABAG and the Metropolitan Transportation Commission (MTC) in preparation of *Plan Bay Area*, which is the Bay Area's Sustainable Communities Strategy (prepared consistent with Senate Bill 375 [2008]), as well as the regional transportation plan. The Planning Department allocates the regional growth forecasts to 981 Traffic Analysis Zones (TAZs)[13] in San Francisco, accounting for already anticipated growth and allocating residual ABAG-forecast growth based on factors including development capacity and existing development patterns, as well as proposed changes such as the Plan. These growth forecasts are provided by the Planning Department to the San Francisco County Transportation Authority for use in the San Francisco Chained Activity Modeling Process (SF-CHAMP) travel demand model, the output from which serves as the basis for the Plan transportation analysis.[14]

As shown in **Table RTC-3, Comparison of Growth Projections, Draft EIR and Initial Study**, the growth forecasts used in the Draft EIR are larger than those presented in the Initial Study. The reason for this is two-fold. First, as explained in footnote 3 on Draft EIR p. IV-5, subsequent to publication of the Initial Study, Plan development assumptions were modified to add development capacity to a portion of Assessor's Block 3778 (bounded by Bryant, Fifth, Brannan, and Sixth Streets, the location of the San Francisco Flower Mart) and to allow for additional housing on Block 3732, at Fifth and Howard Streets. The change on Block 3778 is anticipated to allow for approximately 4,500 mostly office jobs (about 960,000 sq. ft. of built space) beyond the amount of development previously assumed, while the change on Block 3732 is anticipated to accommodate up to approximately 430 units of affordable housing, or about 400 more units (about 480,000 sq. ft.) than previously assumed. In addition, development forecasts were adjusted to move the approved 5M Project and the under-construction Moscone Center Expansion from Plan-induced growth to cumulative and cumulative-with-Plan growth, which resulted in a change in the No Project growth forecasts. (The 5M and Moscone Center Expansion projects were moved to the cumulative analysis because they had undergone their own project-specific environmental review and are not dependent upon the Central SoMa Plan's proposed zoning.) These changes were made by the EIR transportation consultants by manually adjusting the SF-CHAMP output to account for the changes.

The second factor in the Draft EIR forecasts being larger than those in the Initial Study is because of a difference in the methodology by which the forecasts were prepared. As stated above, the Draft EIR's growth forecasts were derived from the Planning Department's citywide growth forecasts that, in turn, are based on the ABAG

[13] TAZs are the smallest geographic units of measurement associated with existing job and household counts.

[14] The SF-CHAMP model is discussed in detail in Section D.7, Transportation and Circulation, of this Responses to Comments document, notably in Responses TR-2 and TR-3.

regional housing and employment growth projections. The Department allocates the regional growth forecasts within San Francisco. In contrast, the growth forecasts reported in the Initial Study relied upon a related but slightly different forecasting process by the Department that was specific to what was then the Central Corridor Plan Area. That approach considered development capacity given the existing and proposed zoning, identified specific sites with realistic potential as development sites, and accommodated known entitled and reasonably foreseeable projects. The difference in the two forecasting approaches (prior to the addition of added growth on Blocks 3778 and 3732) amounted to approximately 6 percent more residential growth (of the total of 9 percent shown in Table RTC-3) and about 5 percent more job growth (of the 13 percent shown in Table RTC-3).

TABLE RTC-3 COMPARISON OF GROWTH PROJECTIONS, DRAFT EIR AND INITIAL STUDY

	Baseline (2010)	Central SoMa Plan (2040)		Percentage Difference[b]
		EIR	Initial Study[a]	
Housing Units (Total)	**7,800**	**22,300**	**21,000**	**6%**
Change from Baseline	—	14,500	13,200	10%
Households (Total)[c]	**6,800**	**21,200**	**20,000**	**6%**
Change from Baseline	—	14,400	13,200	9%
Population (Total)[d]	**12,000**	**37,500**	**35,400**	**6%**
Change from Baseline	—	25,500	23,400	9%
Employment (Jobs) (Total)	**45,600**	**109,200**	**101,900**	**7%**
Change from Baseline	—	63,600	56,400	13%

SOURCE: San Francisco Planning Department, 2016; Fehr & Peers, 2015.

NOTES:

Numbers rounded to nearest 100; some columns and rows do not add due to rounding.

a. Initial Study projections are for what was at that time identified as the High-Rise Option (Option B), the more intensive of two options.

b. Percentage difference is the amount by which Draft EIR growth forecasts exceed those in the Initial Study.

c. Assumes 87 percent occupancy rate for 2010 Baseline based on 2010 Census; assumes a 95 percent future occupancy rate.

d. Assumes 1.77 persons per household.

The added growth on Blocks 3778 and 3732 and the different forecasting approaches used explain why the growth projections are slightly different, although as can be seen in Table RTC-2, the overall totals differ by no more than 7 percent and the increment from existing (baseline) conditions varies by 6 to 13 percent.

The growth projections in both the Draft EIR and the Initial Study attribute growth within the entirety of the original Plan Area as described in the 2013 Plan and in the Plan's Initial Study. That is, both growth forecasts assume that development in the area that was removed from the 2013 Plan Area would be attributable to the Plan. As stated on Draft EIR p. IV-6 in the notes of Table IV-1, Summary of Growth Projections, the reason why the growth forecasts for the Draft EIR were not modified based on the revised Plan boundaries was because 95 to 97 percent of the projected growth in residential and employment uses attributable to the 2013 Plan would occur within the 2016 Plan Area boundaries. Furthermore, as stated above, in fact, this development would occur regardless of whether the 2016 Plan (or the 2013) is adopted because growth projected for this area could occur under existing conditions and neither version the Plan would increase the potential foreseeable

development in this area. Therefore, both sets of growth forecasts are conservative with respect to the potential development that could occur under the Plan.

Concerning other growth forecasts cited in the comments, those from the Central SoMa Plan describe only anticipated growth from the Plan within the revised Plan Area (without the removed parcels at the northern portion of the 2013 Plan Area). As explained above, the Draft EIR conservatively includes the removed parcels in its analysis. The Draft EIR also conservatively assumes more workers per square foot than assumed in the financial analysis prepared for the Plan; thus, the EIR errs toward overestimating rather than underestimating environmental impacts related to employment growth. It is noted that the Draft EIR does not consider the financial analysis as part of its environmental analysis.

Because the Planning Department's citywide growth allocation, derived from ABAG and MTC regional projections and used in the Draft EIR transportation analysis was greater for the Plan Area than the Department's Plan-specific growth forecasts, and because—as described in detail below—the Initial Study's analyses were largely qualitative, it was determined that the Draft EIR should rely on the higher growth forecasts to achieve internal consistency between the transportation analysis and other portions of the Draft EIR. The growth estimates used in the Draft EIR mean that the Draft EIR analyzed about 15 percent more housing units than the Planning Department currently estimates would actually be developed under the proposed Plan. By using higher growth estimates (compared to the Initial Study, the 2016 Plan, or the financial analysis), the Draft EIR provides a conservative analysis based on a reasonable "worst-case" scenario so as to not underestimate potential physical environmental impacts of the Plan.

The commenters' focus on these small differences in growth projections appears to be based on an expectation that the projections used for the Draft EIR must achieve a level of precision that is neither feasible nor required under CEQA. As discussed above, population and employment growth projections involve numerous assumptions about future economic and social conditions, which results in a fairly wide margin of error. It is because of this unavoidable margin of error that projections developed for different purposes (e.g., financial analysis vs. environmental review) incorporate different assumptions to provide reasonably conservative analyses as appropriate for their intended purposes. For example, in response to the inherent uncertainty about future economic conditions, it is good practice to err on the side of underestimating employment growth for financial analysis to reduce the chance that future payroll tax revenues are not significantly lower than anticipated. It is also good practice to err on the side of overestimating employment growth for environmental review to reduce the chance that impacts on transit demand are not adequately mitigated. Thus, the commenters' observation that the employment growth projections used for the Draft EIR are higher than the projections used for the financial analysis does not reveal a flaw requiring recirculation of the EIR as claimed. On the contrary, this difference demonstrates that the Draft EIR provides a reasonable worst-case analysis that accounts for the uncertainty inherent in projecting future growth as appropriate under CEQA.

CEQA does not require the growth projections used to support the analysis of potential physical environmental impacts in the Draft EIR to achieve the level of precision demanded by the commenters. As stated in CEQA Guidelines Section 15151, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." In light of

the uncertainties inherent in predicting future economic and social conditions, the growth projections used in the Draft EIR meet the required standard of what is reasonably feasible.

Analysis of Changes to the Plan for Topics Covered in the Initial Study

As can be seen in Table RTC-3, the growth forecasts relied upon in the Draft EIR are greater in magnitude than those discussed in the Initial Study. (As noted above, the forecasts also include growth in the parcels removed from the original Plan Area.) The Draft EIR presented the bulk of the quantitative analysis of growth anticipated to be induced by Plan approval, including the topics of Transportation and Circulation, Noise and Vibration, Air Quality, and Hydrology (cumulative analysis of potential effects on discharges from the city's combined sewer system, which is based on a quantitative analysis of Plan Area wastewater generation). The Draft EIR also includes analyses of several topics for which the analysis is not based on quantification of population and employment growth, but rather is a function of changes in policy language and zoning controls (Land Use and Land Use Planning) or is a function of the location, footprint, and/or height and massing of anticipated development (Aesthetics, Cultural and Paleontological Resources, Wind, Shadow, Hydrology [risk of flooding]). Regarding the comment seeking clarification regarding the differences in impacts from those analyzed in the Initial Study with respect to traffic, air quality, and pedestrian safety, these issues were analyzed in the Draft EIR, not in the Initial Study, so there is no potential for differences in impacts from those presented in the Initial Study.

For the most part, the issues analyzed in the Initial Study were evaluated qualitatively and do not rely on quantification of population and employment growth; instead, they are a function of changes in policy language and zoning controls (Greenhouse Gas Emissions and Energy) or are a function of the location, footprint, and/or height and massing of anticipated development (Biological Resources, Geology and Soils, Hydrology and Water Quality (except for combined sewer discharges noted above), Hazards and Hazardous Materials, Mineral Resources, and Agriculture and Forest Resources). For each of these issues, the analysis in the Initial Study is not affected by the population and employment forecasts; rather, it is derived from the location of development. Therefore, the Initial Study's analysis of the above topics remains valid and, because it assumes development on the parcels removed from the original Plan Area, is also conservative.

There are four topic areas evaluated in the Initial Study that include population and employment forecasts as part of their assessments: Population and Housing, Recreation, Utilities and Service Systems, and Public Services. The following analysis evaluates the potential environmental effects to these resource topics using the Draft EIR's growth projections.

Population and Housing

The Initial Study finds that the Plan would result in less-than-significant impacts on population and housing. The Plan would not stimulate new population or job growth within San Francisco that is not already projected to occur by regional growth forecasts and regional air quality planning efforts. As stated on Draft EIR p. I-9, the Plan Area is located with the Eastern Neighborhoods and Downtown-Van Ness-Geary Priority Development Areas that are specified in *Plan Bay Area*, the Bay Area's Sustainable Communities Strategy. Thus, the Plan seeks to accommodate already-forecast growth in a part of the city that is easily accessible by transit, thereby contributing to a reduction in greenhouse gas emissions, compared to the same amount of development in a less-transit-accessible location. As stated in Draft EIR Table IV.D-4, Summary of Mode of Travel for Central

SoMa—Weekday PM Peak Period—Existing and 2040 Cumulative Conditions, p. IV.D-35, 30 percent of p.m. peak-hour travel in Central SoMa is currently by transit, and this percentage would increase to 32 percent by 2040 with Plan implementation. This compares to a 12 percent transit mode share for travel to work for the Bay Area as a whole.15 This conclusion that the Plan would not stimulate new unplanned growth remains valid and, in fact, becomes incrementally stronger, based on the greater growth forecasts presented in the Draft EIR. The Initial Study finds that the Plan would not generate housing demand beyond forecasts of projected housing, because San Francisco has already planned for a large increase in housing units, both within and outside the Plan Area. As stated on Initial Study p. 85, Plan-generated housing demand represents roughly 19 percent of the approximate 106,000-unit increase in housing units projected for the city through 2040. This conclusion, too, remains valid with the greater growth forecasts presented in the Draft EIR, given that, compared to the projections in the Initial Study, projected housing unit growth has increased by nearly the same percentage as projected job growth (10 percent versus 13 percent), meaning that the relative increase in jobs and housing units in the Plan Area would be essentially the same as assumed in the Initial Study analysis. Moreover, the 2016 Plan's forecast growth of 14,500 housing units and 63,600 jobs would remain within the population and employment forecasts contained in *Plan Bay Area*, the region's Sustainable Communities Strategy. Finally, the Initial Study finds that the Plan would not displace a large number of housing units or require construction of replacement housing. This conclusion also remains valid when considering the greater growth forecasts presented in the Draft EIR because the Plan does not anticipate removal of substantial numbers of existing housing units, which is strictly regulated and highly discouraged under Planning Code Section 317, as discussed in Response OC-1, p. RTC-248. To the extent that any existing housing units are anticipated to be removed, the Plan anticipates that they would be replaced with a larger number of new dwelling units.

Recreation

As described both in the Initial Study and the Draft EIR, the Plan proposes a number of new park and open space facilities. The projected increase of 7,300 jobs from growth reported in the Initial Study would be a daytime population that could use the recreation and open spaces during break or lunch times. However, the Plan requires office uses to provide open space such that any increase in daytime population demand is likely to be offset by an increased number of privately owned public open spaces. Regarding the residential population, the increase of 2,100 residents from growth reported in the Initial Study would represent 6 percent more growth. However, the Initial Study analysis of recreation and open space was not a quantified analysis because San Francisco has no applicable ratio of parks and open space per number of people. Rather, the General Plan Recreation and Open Space Element (ROSE) calls for a focus on acquisition of open space in underserved areas of the city (Policy 2.1), provision of a balanced recreational system (Policy 2.2), and recreational programs responsive to community needs and changing demographics (Policy 2.3), along with other priorities less applicable to the Plan Area, such as shoreline and civic-serving open spaces. The ROSE also recommends expanded provision of privately owned public open spaces (POPOS), particularly in denser neighborhoods such as the Plan Area. The Initial Study considered that the Plan proposes new publicly available open spaces as well as a comprehensive pedestrian-friendly network to increase access to existing, new, and improved spaces. In particular, the Plan would result in a new park on the block bounded by Bryant, Fourth, Brannan, and Fifth streets, a linear park on Bluxome Street, and numerous other open space improvements, along with, potentially,

[15] Metropolitan Transportation Commission, *Plan Bay Area 2020 Draft EIR*, April 2017; Table 2.1-7, p. 2.1-11. Available at http://2040.planbayarea.org/sites/default/files/2017-07/PBA%202040%20DEIR_0_1.pdf, accessed November 15, 2017.

the creation of a large new park within or near Central SoMa. It is also noted that the Plan Area, like the entirety of San Francisco, has easy access to recreational facilities: San Francisco is the only city in the United States where all residents have access to a park within a 10-minute walk.[16] Therefore, and in recognition of the Plan's proposals for increased open space, the Initial Study's conclusion that the Plan would not increase the use of existing neighborhood and recreational facilities such that substantial physical deterioration of such facilities would occur or be accelerated remains valid, even considering the greater growth forecasts presented in the Draft EIR.

Utilities and Service Systems

With respect to demand for Utilities and Service Systems, the Initial Study finds that the Plan would result in less-than-significant effects related to potable water demand. This conclusion remains valid considering the greater growth forecasts presented in the Draft EIR because the Initial Study estimated water demand of 2.8 million gallons per day using an older, more conservative (i.e., higher) calculation approach. In contrast the Draft EIR relied upon the San Francisco Public Utilities Commission's (SFPUC's) water use calculator, the accepted standard methodology as of December 2016. Based on the SFPUC calculator, the Draft EIR estimates water demand of 1.7 million gallons per day using the higher growth forecasts presented in the Draft EIR (p. IV.I-32). The Initial Study also found a less-than-significant effect with respect to solid waste generation. This conclusion remains valid in light of the greater growth forecasts presented in the Draft EIR because the generation figure of 20,000 tons per day (tpd) provided in the Initial Study (p. 116) was rounded up from a conservative calculation of 19,100 tpd.[17] The relatively small increase in growth projections would result in an increase of about 700 tpd, which would still be less than the 20,000 tpd analyzed in the Initial Study. (The Draft EIR analyzed wastewater and stormwater generation in the context of the potential for combined sewer discharges and are based on the Draft EIR growth projections.) It is noted that adequate provision of services is not the relevant standard for a physical impact under CEQA. The Initial Study evaluated utilities and service systems and determined that the Plan would not result in the need for new or expanded facilities, the construction of which could result in significant physical impacts on the environment, which is the question to be answered under CEQA.

Public Services

The greater growth forecasts presented in the Draft EIR could incrementally increase demand for police, fire/emergency medical services (EMS), parks, and school capacity, compared to that discussed in the Initial Study. Since publication of the Initial Study, new police and fire/EMS facilities have opened in Mission Bay, about 0.5 mile south of the Plan Area. The new Southern Police Station at Mission Bay serves the Plan Area, while the new Fire Station 4 responds to certain calls within the Plan Area. As explained in more detail in Response PS-2 in Section D.16, Initial Study Topics, the question to be answered under CEQA with respect to public services is whether a project would necessitate the construction of new facilities that could cause significant environmental impacts. The Initial Study determined that such a condition would not arise.

[16] Office of the Mayor, "San Francisco Becomes First City in Nation Where All Residents Live Within a 10-Minute Walk to a Park," May 16, 2017, *http://sfmayor.org/article/san-francisco-becomes-first-city-nation-where-all-residents-live-within-10-minute-walk-park*, accessed August 13, 2017.

[17] Solid waste generation estimated by ESA on the basis of consolidated generation factors from CalRecycle, the City of San Diego, and the CalEEMod air quality and greenhouse gas model. Generation factors conservatively assume diversion from landfill of approximately 50 percent of discarded materials.

However, should the Fire or Police departments (or another City agency) determine at some point that new facilities are needed, any potential effects from construction of such facilities would be similar to those already analyzed in the Draft EIR and the Initial Study in connection with growth anticipated under the Plan. Such impacts could include, for instance, construction noise, effects on historical and archeological resources, air quality impacts such as emissions of dust and other pollutants, and temporary street closures or other traffic obstructions. That is, construction of a new fire station, police station, or other comparable government facility would not result in new significant impacts not already analyzed; thus, the effects would already have been addressed in the Draft EIR and the Initial Study. Accordingly, the slightly greater growth forecasts presented in the Draft EIR, compared to those in the Initial Study, would not change the conclusion of the Initial Study, that the Plan "would not increase the demand for police service or fire protection service such that new or physically altered facilities, **the construction of which could cause significant environmental impacts**, would be required in order to maintain acceptable levels of service" [emphasis added].

Concerning school facilities, based on recent growth in public school enrollment and forecasts for continued growth, the San Francisco Unified School District is moving forward with plans for a new school in the Mission Bay South Redevelopment Area. (Development of this school was assumed in the Mission Bay Supplemental EIR of 1998.) Funding for this school could come, in part, from Proposition A school bonds passed by San Francisco voters in November 2016. As with utilities and service systems, the relevant inquiry with respect to public services is whether adverse physical impacts would result from construction of new facilities. To the extent construction of this or any other new school that the San Francisco Unified School District determines is needed to accommodate growing enrollment, the environmental effects of such facilities would be similar to that of subsequent development projects, which are disclosed in the Initial Study and Draft EIR. Regarding financial (socio-economic, as opposed to physical) effects, as with all development projects in San Francisco, development in the Plan Area would be assessed a per-gross-square-foot school impact fee, as stated on Initial Study p. 122. As stated on Initial Study p. 123, local jurisdictions are precluded under state law (Senate Bill 50) from imposing school-enrollment–related mitigation beyond the school impact fees. The collection of these fees fully mitigates any potential effects on schools associated with additional development resulting from Plan implementation; therefore, the Initial Study's less-than-significant conclusion remains valid.

Conclusion

The change in the growth projections between publication of the Initial Study and publication of the Draft EIR does not result in any inadequacy in either document and does not set forth new significant information. Therefore, the analyses in the Initial Study and the Draft EIR remain valid, and no revisions to the Initial Study or the Draft EIR are required. As stated in CEQA Guidelines Section 15088.5, recirculation of an EIR prior to certification is required when new information is added that reveals a new significant environmental impact, a substantial increase in the severity of a previously identified impact, a new alternative or mitigation measure that would reduce the severity of impacts but is not adopted, or the draft EIR was fundamentally inadequate and conclusory in nature that meaningful public review and comment were precluded. None of these is the case here, as explained above and therefore neither the Initial Study nor the Draft EIR requires recirculation.

Other Comments

One commenter incorrectly asserts that "[t]he Project Description must include a description of the environmental setting of the Project." CEQA does require discussion of a project's setting, but not necessarily

as part of the project description in an EIR or other CEQA document. This is evidenced by the fact that the requirements for an EIR project description are discussed in CEQA Guidelines Section 15124, while a separate section of the Guidelines, Section 15125, sets forth the requirement that an EIR include a description of the project's environmental setting. Guidelines Section 15125 does not require that the environmental setting description be located in any particular place within the EIR. Thus, here the environmental setting is discussed in the context of each environmental topic in Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures.

Another commenter states that the project description lacks certain details like the massing models used in the shadow (and aesthetics and wind) analyses and the TAZ detail provided in the transportation analysis. These features are not part of the project, but rather, are sets of reasonable assumptions that underlie the analysis in the Draft EIR. As described above in the discussion of growth projections, the Plan is a regulatory program, not a physical development project or set of development projects, and the Plan itself would not result in direct physical changes. Therefore, a set of reasonable assumptions concerning the future physical development that could be developed in the Plan Area was prepared, and these assumptions form the basis of the Draft EIR's analysis of physical environmental impacts. These assumptions, with respect to growth, are set forth in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, under the "Analysis Assumptions" and "Growth Assumptions" sections, beginning on Draft EIR p. IV-4. The growth forecasts presented in the Draft EIR for the Plan Area represent a summation of TAZ-level assumptions that must necessarily be employed in their disaggregated form in the analysis of local transportation impacts. With respect to the development massing assumptions employed in the aesthetics, wind, and shadow analyses, these are described in "Approach to Analysis" in the "Overview" section to Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, and are also appropriately described in those topical sections of the Draft EIR.

The same commenter also contends that the Draft EIR eliminated the mid-rise option favored by the previous version of the Plan. As noted on Draft EIR p. II-3, the "mid-rise" height limit option was considered as the Reduced Heights Alternative. Details regarding this alternative are discussed in Response AL-1, p. RTC-274, and Response AL-3, p. RTC-292. Therefore, the mid-rise height alternative analyzed in the Initial Study is included in the Draft EIR and decision makers may choose to adopt that alternative during its deliberations on the Plan. The 2016 Plan includes a single height option that is neither the mid-rise option nor the high-rise option from the 2013 Plan, but a combination based on public outreach and further Planning staff analysis and consideration. The commenter's preference for the mid-rise option does not affect the adequacy or accuracy of the Draft EIR.

The commenter erroneously contends that the Plan would accept in-lieu and community benefits fees instead of requiring new parks. As discussed on Draft EIR p. II-31, the Plan includes the creation of new open spaces in the Plan Area, including a potential new park on the block bounded by Fourth, Fifth, Bryant, and Brannan streets, linear open spaces, alley improvements, and privately owned public open spaces. Developer fees are one portion of the anticipated funding source for the creation of new parks and open space. Parks and open spaces are further discussed in Response RE-1, p. RTC-326. Moreover, this comment is not related to the adequacy or accuracy of the Draft EIR.

Concerning residential displacement, as explained on Initial Study p. 87, a net physical loss of housing units is unlikely because Planning Code Section 317 restricts demolition of existing housing and requires replacement of residential structures lost through demolition. Potential displacement of affordable housing through

gentrification—a socioeconomic impact and not a physical impact, and thus not within the purview of CEQA—is discussed on Draft EIR p. V-7 under Section V.E.2, Socioeconomic Considerations under CEQA. There it is noted that Plan Goal 2, Maintain the Diversity of Residents, seeks to address socioeconomic concerns related to business and residential displacement. As described on Draft EIR p. II-13, Goal 2 includes objectives to maintain existing housing stock and its affordability, ensure that at least 33 percent of new housing is affordable to lower-income households, and support housing for other households that cannot afford market-rate housing and for a diversity of household sizes. Goal 2 also includes objectives to provide support for needed services such as schools, child care, and community services. Additional detail concerning programs relevant to these potential socioeconomic effects is provided in the draft Central SoMa Plan and in its Implementation Program. As explained on Draft EIR p. II-8, the description of the draft Plan in the project description "does not include a comprehensive description of the entirety of the Central SoMa Plan and Implementation Strategy. Rather, the description focuses on those policies and implementing mechanisms that have implications for environmental review, because they could result in physical changes to the environment." For further discussion regarding socioeconomic issues and gentrification, see Response OC-1, p. RTC-248.

Comment PD-7: Pedestrian and Bicycle Improvements

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

I–Brennan.2
I-Nagy.1
I-Rosenberg.3

"I would also like to see Annie Street closed to cars again. It was nicer that way, and the only people impeded were people who inexplicably chose to drive private vehicles into the heart of the city for office jobs that are on top of BART and Muni. The sidewalks are crowded, and will get more crowded as the Transbay Terminal comes into use, so more pedestrian spaces are an important priority for me and the many other D6 residents who don't own cars or prefer to get around without them. Please do not sacrifice the pedestrian elements of the plan when/if compromises need to be made about space allocations." *(Nicole Brennan, E-Comment, February 13, 2017 [I–Brennan.2])*

"I've read the parts of the Draft EIR related to biking in Central SOMA as I often commute through it. I live in Mission Bay and one of the fastest ways of getting to downtown is via the Third Street corridor. It's not clear whether the bike lane proposed for the Third Street corridor is protected or not. I fear it is the latter. The success of protected bike lanes on Fell St and San Jose Avenue (and soon to come to 7th/8th) show that is the only way forward for bike lanes in heavily trafficked areas (like Third street).

"I think it is paramount for the safety of bicyclists that the cycletracks installed on Third and Fourth are protected by parking or concrete barriers/planters." *(Tamas Nagy, E-Comment, December 18, 2016 [I-Nagy.1])*

"As for biking, I live on 5th Street and would like to see a class I dedicated bike lane there. On 4th Street, over the bridge, I would like to see it closed to vehicular traffic and turned into a pedestrian/transit only bridge. This would prevent the T line from being congested by cars, and greatly improve the T line reliability and speed. Cars could go to the nearby 3rd Street bridge or on 8th Street. *(Isaac Rosenberg, E-Comment, January 23, 2017 [I-Rosenberg.3])*

Response PD-7

The first comment recommends closure of Annie Street to vehicles, as was implemented between 2014 and 2016. As stated in Draft EIR Chapter II, Project Description, p. II-8, the Plan includes improvements to Annie Street that would involve "an expanded mini-plaza at the intersection of Annie and Market streets to Stevenson Street, a new pedestrian plaza closed to vehicular traffic between Mission Street and Ambrose Bierce Alley, and a single-surface shared street along the remainder of Annie Street between the two plazas."

The other comments request clarification about whether the bicycle lane proposed for the Third Street corridor under the Plan would be protected (i.e., physically separated from traffic) or not, state that bike lanes in areas of heavy traffic should be protected, and express an opinion that cycle tracks/bike lanes installed on Third and Fourth streets should be protected by parking or concrete barriers or planters. As shown in the Draft EIR (Figure II-11, Existing and Proposed Bicycle Lane Network, p. II-26), under Plan implementation, new protected bicycle lanes along Third Street and part of Fourth Street (between Market and Harrison streets) are proposed under the Plan; no protected bicycle lanes currently exist along these streets. As used and defined in the Draft EIR, the term "cycle track" refers to a bike lane that is separated from vehicle traffic and parked cars by a buffer zone, offering safer cycling conditions, especially on streets with greater traffic volumes traveling at relatively high speeds. An alternative and equivalent term for a cycle track is a "protected bicycle lane," and this latter term is preferred by the San Francisco Municipal Transportation Agency (SFMTA).

Another comment requests a Class I bicycle lane (separated from traffic) on Fifth Street and that the Fourth Street bridge across Mission Creek be limited to pedestrians and bicycles. As shown on Figure II-11, Existing and Proposed Bicycle Lane Network, p. II-26, protected bicycle lanes are proposed on Fifth Street as part of the 2009 San Francisco Bicycle Plan and, thus, are not proposed under the Central SoMa Plan. No changes are proposed for the operation of the Fourth Street bridge. Figures F-1 through F-34 in Draft EIR Appendix F provide more detail regarding potential buffers and other protective features that would be installed along the protected bicycle lanes. Detailed designs of the bicycle lanes and protected bicycle lanes proposed in the Plan have yet to be completed by SFMTA and the Planning Department.

These comments address the merits of the Plan and not the adequacy or accuracy of the Draft EIR. As such, the comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PD-8: Request for Park on Second Street

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

O-CSN-1.5

"The City should also consider creating a park at 350 Second Street. This property is currently a parking lot, and provides a prime opportunity for the City to address the acknowledged need for more parks and open space in the area. In the alternative, development on this parcel should be limited to no more than 130 feet since it is close to neither BART nor Caltrain." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.5])*

Response PD-8

The comment states that the City should consider creating a park in the location of a property currently used as a parking lot, at 350 Second Street. The comment also states that, in the alternative, the maximum building height allowed on this parcel should be 130 feet. As shown on Figure VI-1, Reduced Heights Alternative Height Districts Map, p. VI-15, the block containing this parcel is shown with a maximum allowable building height of 130 feet. The comments address the Plan and do not address the adequacy or accuracy of the Draft EIR. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PD-9: Revise Maximum Height Proposed for Parcels North of I-80 Freeway and East of Fourth Street

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

O-One Vassar.1

"**Page:** **Comment:**
"III-10 Urban Design Element: Text provides that 'In addition, several parcels north of the I-80 freeway and east of Fourth Street would be zoned to a maximum of 300-feet.' This should be changed to 350 feet, to be consistent with the proposed height increase map in Figure ll-7." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.1])*

Response PD-9

The comment states that the height limit that could be implemented under the Plan for several parcels north of the I-80 freeway and east of Fourth Street is incorrectly described in the text on Draft EIR p. III-10. The commenter is correct. Accordingly, the second sentence in the last paragraph on Draft EIR p. III-10 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> … In addition, several parcels north of the I-80 freeway and east of Fourth Street would be zoned to a maximum of ~~300~~350 feet. …

The Project Description (Chapter II) correctly describes proposed height limits of up to 350 feet north of Harrison Street and east of Fourth Street. However, one of the Draft EIR shadow graphics—Figure IV.H-6, already revised in Section B, Revisions to the Proposed Plan—has been corrected to properly reflect the 350-foot building height. The corrected figure shows shadow from Plan Area development extending approximately 60 feet farther north

and about 40 farther east into the southwestern-most portion of the POPOS at 303 Second Street on September 20 at 12 noon, compared to shadow depicted in the Draft EIR. As explained in Response SH-2 in Section D.11, Shadow, effects on the 303 Second Street POPOS would be less than significant because this open space would remain in sunshine during the lunchtime period throughout most of the year. Therefore, recirculation of the Draft EIR, pursuant to CEQA Guidelines Section 15088.5, is not required.

Comment PD-10: State Density Bonus Program

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

O-SOMCAN-Cabande.7
O-VEC.10

"**4. The Proposed Intensity of Development and Relaxing of Development Controls Have Not Been Evaluated With Respect to State Density Bonus Laws in the DEIR**

"In 2016, the City passed the 'Density Done Right' legislation allowing 100% affordable housing developments to apply for a significant increase in height and number of units without any rezoning. Also during 2016, legislation passed at the State level to enable developers throughout California to more easily take advantage of State Density Bonus incentives.

"The DEIR references these laws on p. II-22 but only in reference to increased heights. It's unclear how the State Density Bonus will or will not be applied to heights and to unit counts for market rate developments, especially in light of Planning's approval of the project at 333 12th Street, the first housing development in San Francisco to be approved with applying the State Density Bonus. The DEIR also references the Density Bonus for affordable housing projects on p. Vl-2 but says that the increased number of units has not been considered for the DEIR. The DEIR is incomplete if it does not completely study the impacts of increased heights and increased number of units for both affordable and market rate housing.

"The DEIR must also completely disclose to the public where developers are eligible to use either the State Density Bonus Program, or the San Francisco 'Density Done Right' program. The DEIR must clearly indicate on maps where those sites are located, and must compare the new proposed zoning and its resulting intensity of use with the potential intensity of use if developers take either the State or Local density bonus. The DEIR must compare the relative impacts of these two scenarios on the environment. Without these analyses for each project within the plan area, as well as the overall impacts, the DEIR is inadequate." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.7])*

"The DEIR mentions that the Plan will address the housing needs by meeting 'at least 33% of new housing to very low, low and moderate income' (II-13) yet it fails to include analysis of State Density Bonus Program which will allow for developments to increase heights without guaranteeing that additional affordable housing units will be built on-site. For example, the 333 12th St. development by Panoramic Interests was the first to use State Density Law without providing additional affordable units, settling to 13.5% instead of 18%, in accordance to Prop C which was passed last year. Although this development was outside the proposed Central SOMA Plan,

the decision by Planning Commission last December set a precedent to upcoming developments adjacent to this area plan. In this proposed plan, how will the State Density Bonus Program effect construction of new residential developments?" *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.10])*

Response PD-10

The comments state that it is unclear how the state density bonus program would be applied to heights and unit counts for market-rate developments within the Plan Area and request clarification regarding how the state density bonus law will affect construction of new residential development. Other comments state that the Draft EIR must disclose to the public where developers are eligible to use either state density bonus law or the city's own affordable housing density program, that the Draft EIR must evaluate a Plan scenario that reflects the potential intensity of use if developers use either the state or the local density bonus, and that use of the state density bonus could result in fewer affordable units than would be required under other city laws and regulations.[18]

The California state density bonus law, adopted in 1978, allows developers to select concessions from local development standards if a certain percentage of affordable units are included in a project. As noted by one commenter, in 2016, the state legislature approved modifications to the density bonus law (AB 2501) designed to streamline local agency approval of projects seeking a state density bonus. In 2017, subsequent to publication of the Draft EIR, the City approved amendments to its local housing density bonus program, codified in Planning Code Section 206, Affordable Housing Bonus Programs. Section 206 incorporates, among other programs, the 100 Percent Affordable Housing Bonus Program (Planning Code Section 206.4; approved in 2016 as Section 206.3), which allows for up to three additional stories of residential development for fully affordable residential projects, as well as procedures for projects seeking approval of a state density bonus (Planning Code Section 206.6). Both of these programs would be applicable to the Plan Area.[19] However, it is unlikely that the 100 Percent Affordable Housing Bonus Program would be widely used in the Plan Area. This is because, due to cost considerations and other factors, 100 percent affordable housing development in San Francisco has virtually always been limited to buildings 85 feet in height or less, and the height limit proposed on nearly every major street in the Plan Area is at least 85 feet, meaning that there would be substantial construction cost penalty in seeking additional permitted height.[20]

Planning staff estimates that the potential for additional residential construction by projects seeking a state density bonus could result in approximately 575 additional housing units in the Plan Area. This estimate

[18] One comment refers to a city-adopted program called "Density Done Right." This comment actually appears to reference the city's 100 Percent Affordable Housing Bonus Program. "Density Done Right" was the name of an alternative to the housing density program for largely market-rate residential projects that was approved by the Board of Supervisors in 2017.

[19] Two other components of Section 206—the Housing Opportunities Mean Equity – San Francisco, or HOME-SF Program (Section 206.3) and the analyzed state density bonus program (Section 206.5)—would not apply to the Plan Area, as they are applicable only to use districts where residential density is regulated by lot size. In the Plan Area, residential density would be regulated by building height and bulk controls, an approach generally known as "form-based zoning."

[20] Eight-five feet is approximately the maximum height that can be built without triggering "high rise" life-safety and structural requirements under the Building Code. Although there are exceptions, cost is one of the factors that discourages high-rise construction for 100 percent affordable housing projects in San Francisco, because concrete or steel construction used in taller buildings is considerably more expensive on a per-unit basis than is wood framing.

assumes that half of the new residential development projects anticipated in the Plan Area would provide on-site affordable housing (a condition of seeking the state density bonus)[21] and that the average state density bonus would be 23 percent additional units beyond the base density permitted.[22]

In addition to the state density bonus, the Plan includes its own provision for a height bonus of 25 feet "on sites where such flexibility in height would facilitate the provision of affordable housing and/or public open space beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow" (Draft EIR p. II-23). However, as discussed in Response PD-2, this provision is likely to be available to a limited number of sites that are large enough to dedicate a portion of the site for affordable housing or public open space. Planning staff estimates that implementation of this provision could result in an addition of approximately 300 units of affordable housing on sites that otherwise would have been commercial only. Together, therefore, the two programs discussed above could add approximately 875 dwelling units to the Plan Area.

However, the Draft EIR growth forecasts, discussed above in Response PD-6, resulted in the Draft EIR analyzing about 15 percent more housing units, or about 1,260 more units, than the Planning Department currently estimates would actually be developed under the proposed Plan. These high estimates ensure that the EIR is conservative in its assumptions of the potential environmental impacts of the Plan.[23] The EIR studies the addition of 14,500 units by 2040 with the Central SoMa Plan implementation whereas the Central SoMa Plan projects the addition of 13,240 units by 2040 with Plan implementation, inclusive of the approximately 875 units that could result from the two bonus programs described above. As such, the growth assumptions used in the Draft EIR remain adequate to describe forecasted residential development in the Plan Area should the state density bonus and the Plan's own height bonus program be used as now anticipated.

As stated previously, the growth assumptions in the Draft EIR (which includes both the currently proposed Plan Area as well as the area of the 2013 draft Plan) are derived from overall citywide growth assumptions developed by the Planning Department based on the regional planning effort underlying *Plan Bay Area*. *Plan Bay Area* growth allocations for the city can be accommodated under existing height and bulk controls; thus existing zoning is not currently a constraint on growth or determinant of the overall amount of housing growth expected citywide by 2040. Moreover, the availability of a density or height bonus in this location in and of itself does not change the overall demand for housing citywide or regionally. Given that, it is assumed that increased residential development in the Plan Area due to the use of the state density bonus and/or the Plan's own height bonus would lead to a concomitant decrease in residential development elsewhere in San Francisco. That is, while the Plan seeks to concentrate and focus a greater percentage of San Francisco's growth in the Plan Area, adoption of the Plan in and of itself would not alter the overall growth forecast under *Plan Bay Area* to occur in

[21] This assumption is based on recent precedent for buildings 85 feet tall and higher, which reflects the allowed and proposed height limits for most of Central SoMa.

[22] The 23 percent additional density is reflective of the formula in California Government Code Sections 65915-65918, coupled with the requirements of Planning Code Section 415. This 23 percent average is not reflective of the maximum bonus that could be available per project (which is 35 percent), but is the most likely average bonus for projects meeting or modestly exceeding the applicable local inclusionary requirements. Based on evidence to date, it is unlikely that all eligible projects could or would seek and justify the maximum 35 percent bonus.

[23] Steve Wertheim, San Francisco Planning Department, "Central SoMa Plan – Clarification of Housing Numbers" memorandum to Board of Supervisors Land Use and Transportation Committee (Supervisors Farrell, Peskin, and Tang) and Supervisor Kim December 7, 2017.

San Francisco.[24] Moreover, the state density bonus is as likely to be used in projects outside the Plan Area as within the Plan Area. Assuming that demand is independent of supply, the use of the density bonus at one location to develop a certain number of added residential units would reduce demand for a comparable number of units elsewhere. There is no way to predict which locations, whether within or outside the Plan Area, would be developed with benefit of the state density bonus, and attempting to do so would be speculative. Barring such speculation, one could assume that every eligible residential development site would employ the state density bonus. However, this approach would be likely to considerably overstate the number of residential units that would be developed. In reality, the state density bonus, as well as the Plan's own height bonus provision, would be applied on a case-by-case and site-by-site basis and will have to be evaluated as such for any site-specific effects, such as shadow or wind impacts. Therefore, at a programmatic level, the Draft EIR adequately analyzes growth that could occur pursuant to both the state density bonus program and the Plan's own height bonus provision, and the resulting effects such as transportation, air quality, traffic noise, and water demand and combined sewer flows. Regarding other effects, such as aesthetics and wind or shadow impacts, which are site-specific, it would be speculative to analyze potential future height and/or density on any given site when it cannot be known on which specific sites any such density or height bonus might be sought in the future. Subsequent development projects in the Plan Area would undergo project-level CEQA review, as applicable, to determine whether or not they would result in significant environmental effects not disclosed in the Draft EIR as a result of any additional height increases or bulk modifications permitted under the state density bonus law. The Plan's height bonus provision requires a finding that a project that takes advantage of this bonus must demonstrate that it would not result in significant wind or shadow impacts. Furthermore, such projects would meet the requirements of SB 743, which states that aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects under CEQA.

As addressed in Response PD-6, these comments seek a level of precision in the growth projections used for the Draft EIR that is neither feasible nor required under CEQA. The growth projections assumed in the Draft EIR support the Planning Department's good faith effort to disclose the physical environmental impacts that could result under the proposed Plan and, thus, satisfy the requirements of CEQA. Nowhere in the Central SoMa Plan EIR is it stated or implied that the projections were intended as a cap or limit to growth within the area that would be subject to the Central SoMa Plan. The growth projections were based upon the best estimates available at the time the Central SoMa Draft EIR was prepared. The comments do not demonstrate that the conclusions in the Draft EIR concerning the effects of growth under the proposed Plan on the physical environment are not supported by substantial evidence in the record.

As discussed in the Draft EIR, the Plan is programmatic in nature, and the CEQA analysis of Plan implementation (with the exception of the street network changes and open space improvements) is likewise programmatic in nature. It would be speculative to specifically identify which sites a project sponsor may choose to develop additional density on beyond the height limits proposed in the Plan (and, therefore, it is not possible to provide a map of the sites in the Draft EIR), but in accordance with state or local regulations, as well as programs that allow for a density bonus. CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145).

[24] When allocating anticipated future regional growth that is assigned through the regional planning process to San Francisco, the Planning Department, as part of a forecasting exercise for a plan area such as Central SoMa, maintains cumulative totals consistent with the regional plan, inclusive of whatever proposed zoning changes are being analyzed.

Concerning the comment that potential use of the state density bonus could result in fewer affordable units than the City would otherwise require, affordability is not a physical impact, per se; therefore, whether a unit is a market-rate unit or an affordable unit is not relevant under CEQA. Nevertheless, it is noted that use of these bonus programs would not conflict with the Plan's goal of ensuring that 33 percent of new housing units would be affordable to low- and moderate-income households. This is because the City requires that "bonus units" pay the inclusionary housing fee at a rate of 33 percent for ownership units and 30 percent for rental units.

This response also addresses the commenter's request for an explanation of how the state density bonus applies to the Central SoMa Plan Area. Therefore, because it is no longer correct, the text below on Draft EIR p. II-22 has been deleted (deleted text is shown as strikethrough):

> … some existing lower height limits would be increased to as much as 85 feet. ~~It is noted that the Plan's proposed height districts take into considerations the State's affordable housing density bonus, as delineated in Assembly Bill 2501 Housing: Density Bonuses, approved by the Governor on September 28, 2016. As such, subsequent residential projects that could be developed under the Plan are not expected to exceed heights proposed by the Plan. The exception may be 100% affordable housing projects, which could utilize the City's affordable housing bonus program in accordance with the provisions, requirements, and limitations of that program.~~

Likewise, in Draft EIR Chapter VI, Alternatives, footnote 420 on p. VI-2 has been deleted (deleted text is shown as strikethrough):

> ~~[420] Development assumptions for the alternatives do not take into account the potential for application of the density bonus for affordable housing projects enabled by AB 2501.~~

In addition, the following header and subsequent text regarding the State Density Bonus has been added for clarification on p. IV-10 in the "Overview" section of Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures (new text is double-underlined):

> **State Density Bonus**
>
> The California state density bonus law, adopted in 1978, allows developers to select concessions from local development standards if a certain percentage of affordable units are included in a project. In 2017, subsequent to publication of the Draft EIR, the City approved amendments to its local housing density bonus program, codified in Planning Code Section 206, Affordable Housing Bonus Programs. Section 206 incorporates, among other programs, the 100 Percent Affordable Housing Bonus Program (Planning Code Section 206.4; approved in 2016 as Section 206.3), which allows for up to three additional stories of residential development for fully affordable residential projects, as well as procedures for projects seeking approval of a state density bonus (Planning Code Section 206.6). Both of these programs would be applicable to the Plan Area.[25]
>
> The growth assumptions in the Draft EIR (which includes both the currently proposed Plan Area as well as the area of the 2013 draft Plan) are derived from overall citywide growth assumptions developed by the Planning Department based on the regional planning effort underlying *Plan Bay Area*. *Plan Bay Area* growth allocations for the city can be accommodated under existing height and bulk controls; thus existing zoning is not currently a constraint on growth or determinant of the overall amount of housing

[25] Two other components of Section 206—the Housing Opportunities Mean Equity – San Francisco, or HOME-SF Program (Section 206.3) and the analyzed state density bonus program (Section 206.5)—would not apply to the Plan Area, as they are applicable only to use districts where residential density is regulated by lot size. In the Plan Area, residential density would be regulated by building height and bulk controls, an approach generally known as "form-based zoning."

growth expected citywide by 2040. Given that, it is assumed that increased residential development in the Plan Area due to the use of the state density bonus and/or the Plan's own height bonus would lead to a concomitant decrease in residential development elsewhere in San Francisco. That is, while the Plan seeks to concentrate and focus a greater percentage of San Francisco's growth in the Plan Area, adoption of the Plan in and of itself would not alter the overall growth forecast under *Plan Bay Area* to occur in San Francisco.[26] Therefore, the Draft EIR adequately analyzes growth that could occur pursuant to both the state density bonus program and the Plan's own height bonus provision, and the resulting effects such as transportation, air quality, traffic noise, and water demand and combined sewer flows. Regarding other effects, such as aesthetics and wind or shadow impacts, which are site-specific, it would be speculative to analyze potential future height and/or density on any given site when it cannot be known on which specific sites any such density or height bonus might be sought in the future. Subsequent development projects in the Plan Area would undergo project-level CEQA review, as applicable, to determine whether or not they would result in significant environmental effects not disclosed in the Draft EIR as a result of any additional height increases or bulk modifications permitted under the state density bonus law.

Comment PD-11: Street Network Changes

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

A-SFMTA.1

"Page S-1. Fourth Paragraph. On the fourth line, there is a reference to "specific designs" under analysis, however each corridor is going through a development/ design process. At this point only basic design concepts have been included for the environmental." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.1])*

Response PD-11

The comments state that the street network changes that would be implemented under the Plan are incorrectly described in the text on Draft EIR p. S-1, which states that the EIR analysis addresses specific designs for several streets. The use of the word "specific" in this sentence is not intended to connote a detailed level of engineering or design; the commenter is correct that only conceptual designs have been drafted for these street improvements. Regardless, the level of design presented in the Draft EIR for the street improvements is sufficient for a project-level environmental review, which does not require highly detailed design or engineering drawings. As discussed in the Draft EIR (starting on p. S-4), the analysis contains both analysis at a "program-level" pursuant to CEQA Guidelines Section 15168 for adoption and implementation of the Plan and "project-level" environmental review for street network changes and open space improvements. Therefore, revisions to the Draft EIR to address the comment are not required.

[26] When allocating anticipated future regional growth that is assigned through the regional planning process to San Francisco, the Planning Department, as part of a forecasting exercise for a plan area such as Central SoMa, maintains cumulative totals consistent with the regional plan, inclusive of whatever proposed zoning changes are being analyzed.

Comment PD-12: Tower Separation Policy

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

O-B505.1

"Our office represents B505 Industries, LLC with respect to their proposed project located at 505 Brannan Street. In December 2015, the Planning Commission approved an 85-foot-tall, office building at the site, consistent with the existing MOU zoning district. The project is under construction and now the project sponsor is pursuing entitlement of a "Phase II" addition to the project which would result in a 240 foot tall office tower, consistent with the zoning and height limitations for this site being analyzed in the Draft Environmental Impact Report ("DEIR") for the Central So Ma Plan as well as the 2013 draft of the Central So Ma Plan. The purpose of this letter to provide some brief comments on the DEIR.

"We are pleased to see that the DEIR studied the full buildout of a 240 foot tall project at the site. Specifically, both the wind and shadow studies assumed a 240 foot tall project, with the understanding that each individual project would need to perform project-specific wind and shadow studies (among others) to confirm they do not cause a significant and unavoidable impact in order to justify the issuance of a Community Plan Exemption to cover environmental review.

"Despite the lack of identified environmental issues to date (and the provision for further study in the future to confirm), Planning Department staff's most recent Central SoMa Plan draft calls for a 130 foot height limit at the site. The reasoning behind this is the proposed tower separation limitation in the Plan, which would limit new 160+ foot towers within 115 feet of other 160+ foot towers. Since a residential tower has been proposed at 620 Fourth Street adjacent to 505 Brannan Street, the proposed tower separation rule could put these two projects in conflict.

"The Plan has several primary goals, including maximizing space for jobs in one of the last remaining areas of the City that can accept high-density office development - which is directly fulfilled by the Phase II project at 505 Brannan Street. The Plan includes many different policies, some of which conflict with each other. Ultimately, the City's primary planning body, the Planning Commission, should be the arbiter of these competing goals, and the Planning Commission can really only consider these factors once a project (or projects) are before them.

"We do not think the tower separation rule is necessary to include in the Plan nor do we think it is appropriate to restrict the height limit at 505 Brannan Street to avoid a tower separation conflict. Based on the height limits proposed in the Plan, 505 Brannan Street and 620 Fourth Street is the only situation where this rule would potentially apply to two separate projects and project sponsors. Because of this, it is appropriate to allow for the Planning Commission to consider this issue when the actual proposed projects are before them, so they can understand what is actually being proposed and can make a decision on this unique situation. We should not take discretion away from the Planning Commission to weigh the competing policies, environmental concerns, and designs of the future projects and make a decision considering all of those factors. The Planning Commission should be given the opportunity to make the decision as to whether and how much these two towers must be separated once the actual projects are being considered by it.

"If the height limit is reduced, there is no justification for reducing it below 160 feet, above which the tower separation rule would apply. As such, the height limit for the site should be no shorter than 160 feet.

"Finally, eliminating the Planning Commission's discretion in favor of one project over another does not allow for flexibility in achieving the Plan's goals considering the uncertainty in the private development industry. Every project is subject to market forces as well as the unique circumstances of a project sponsor, and essentially choosing one project over another right now, before the projects are even prepared for approval, eliminates the ability of the Planning Commission to adjust based on evolving conditions.

"We recognize that the tower separation issue is one that the Planning Commission will consider separate from the adequacy of the Plan's DEIR. We felt it important to make clear that the DEIR does allow for the Phase II project at 505 Brannan Street, and that the Commission has the ability to determine whether and how to apply the tower separation rule at Plan adoption. Thank you." *(John Kevlin, Reuben, Junius & Rose, B505 Industries, LLC, Letter, February 13, 2017 [O-B505.1])*

Response PD-12

The comment addresses a project proposed for 505 Brannan Street, a site located within the Plan Area. This project comprises an addition to an existing office building that would result in a 240-foot-tall office tower. The comment states that the Draft EIR studied the full buildout of this project as proposed by the sponsor and that a potential conflict between this project and another residential tower proposed at 620 Fourth Street adjacent to the project site could occur, because of the Plan's proposed tower separation limit. The comments also include a statement that the tower separation rule is not necessary to include in the Plan, and that it would be appropriate for the Planning Commission to instead consider the issue of potential conflict when reviewing proposed plans for these two projects, to allow for flexibility in achieving the Plan's goals.

The comment addresses the merits of the Plan and does not address the adequacy or accuracy of the Draft EIR. As noted by the commenter, the tower separation limit, which is included both in the Plan and in the proposed zoning controls (Planning Code amendments) released in February 2018,[27] will be considered separately from the adequacy of the Draft EIR. While the Plan does include a tower separation implementation measure, which would be carried out by the proposed February 2018 Planning Code amendments (applicable to buildings greater than 160 feet in height), this would not be a new zoning feature to San Francisco. The existing Planning Code also requires separation between towers in all areas of the city where building heights are permitted above approximately 130 feet. These areas include the Downtown (C-3) Use Districts (Planning Code Section 132.1); Rincon Hill, including the Folsom and Main Residential/Commercial Special Use District (Planning Code Sections 270(e) and 249.1); the Van Ness and Market Downtown Residential Special Use District (Planning Code Section 270(f)); Executive Park (Planning Code Section 263.27); Treasure Island (Planning Code Section 249.52); and the Fifth and Mission Special Use District, site of the approved 5M project (Planning Code Section 249.74).

It is noted that, since publication of the Draft EIR, the Planning Department has made minor revisions to the Plan's proposed height and bulk map for the Plan Area, including for the 505 Brannan Street site. Under the February 2018 proposed zoning controls, the permitted height of this site would be 250 feet. This is the same height that was

[27] Central SoMa Plan Initiation Packet; Case No. 2011.1356MTZU. February 15, 2018, *http://commissions.sfplanning.org/cpcpackets/2011.1356MTZU.pdf,* accessed March 16, 2018.

analyzed in the Draft EIR (see Draft EIR Figure II-7, p. II-19), but is greater than the 130-foot height limit proposed in the August 2016 Draft Plan. While the Draft EIR analyzed a 250-foot height across the entirety of the site at the southwest corner of Fourth and Brannan streets, the Draft EIR analyzed a single tower, on the portion of the site closest to the corner of Fourth and Brannan streets, in acknowledgement of the proposed tower setback controls. The site to which the Plan's proposed 250-foot height limit would apply encompasses three separate lots that are under multiple ownership. As of the publication date of this Responses to Comments document, there are development proposals on file for two separate towers on this site, one of which is on the site at 505 Brannan Street, which is the subject of this comment, while the other is the proposed project at 620 Fourth Street. As noted by the commenter, the proposed tower separation requirement would preclude both projects from being developed. However, in recognition of the fact that either tower alone would be in compliance with the Plan, Planning Department staff "has decided that instead of presuming the preferred location of the tower through the Plan the decision will be deferred to the entitlement process."[28] Accordingly, both projects' proposed locations are proposed for a height limit of 250 feet. No revision of the Draft EIR proposed height and bulk map (Figure II-7) is required because, as noted on Draft EIR page II-7, the Draft EIR analyzed height limits for several parcels that are "higher than those proposed in the 2016 draft Central SoMa Plan."

The comments regarding the proposed tower separation requirement will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PD-13: Proposed Changes to 330 Townsend and 636–648 Fourth Streets

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

I-Rosenberg.2

"[F]or specific projects, I would like to see Planning let 330 Townsend proceed as all residential, and not have to dedicate space for a mid-block alley, which would remove badly needed housing units. In addition, I would like to see an upzone for the 636-648 4th Street site to 350 feet, to add more housing to the area. *(Isaac Rosenberg, E-Comment, January 23, 2017 [I-Rosenberg.2])*

Response PD-13

The comment states the commenter's opinion about future development on two sites in the Plan Area to potentially allow for more housing. The comment addresses the merits of the Plan, and does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

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[28] Exhibit V.5, "Summary of Revisions – Zoning Map," contained within Central SoMa Plan Initiation Packet (see footnote 27).

D.2 Plans and Policies

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

- Comment PP-1: 598 Brannan Street Project Description
- Comment PP-2: Plan Bay Area Housing Goals
- Comment PP-3: East SoMa Area Plan at Risk
- Comment PP-4: General Plan Consistency
- Comment PP-5: History of Prior Planning Efforts
- Comment PP-6: Office Uses in Central SoMa
- Comment PP-7: One Vassar Project
- Comment PP-8: Provide Page Reference When Other Area Plans Referenced
- Comment PP-9: Western SoMa Mixed Use Office (WMUO) Zoning District

Comment PP-1: 598 Brannan Street Project Description

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

O-Tishman.3

"**Page:** **Comment:**

"III-20 The first paragraph on this page identifies 598 Brannan Project as a '700,000 square-foot building.' This should be revised to reflect the project's description, submitted in connection with the current environmental evaluation application. The 598 Brannan Project is anticipated to contain approximately 984,429 square feet of office." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Tishman Speyer, Letter, February 13, 2017 [O-Tishman.3])*

Response PP-1

The comment states that the size of the 598 Brannan Street project described in the Draft EIR is inaccurate. The description of this project is presented in the context of the City's annual limit on approval of office development (Draft EIR Chapter III, Plans and Policies, p. III-20). This description is based on the "Office Development Annual Limitation (Annual Limit) Program" document dated July 22, 2016, which shows the 598 Brannan Street project as including 700,456 square feet of office space. That total was based on this proposed project's office space allocation application (pursuant to Planning Code Section 321) filed in July 2013. Prior to publication of the Draft EIR, the project sponsor submitted an application for a shadow analysis (pursuant to Planning Code Section 295), showing 984,400 square feet of office space, to the Planning Department, but did not revise the Section 321 application. Because the Draft EIR was based on the information submitted in the Section 321

application, the revised information was not included in the Draft EIR. Since publication of the Draft EIR, a revised Section 321 application for the 598 Brannan Street project has been submitted, showing 922,291 square feet of office space, and the "Office Development Annual Limitation (Annual Limit) Program" document dated January 12, 2018, has been updated to reflect the revised application.

As the Draft EIR does not analyze individual development projects, changes to the 598 Brannan Street project description would not affect the impact analyses for any of the topics discussed in the Draft EIR, because the larger project on this site would be accommodated within the overall growth forecast in the Plan Area, which is analyzed in the Draft EIR. See Response PD-6 for a discussion regarding the growth projections analyzed in the Draft EIR. Site-specific impacts of individual projects would be evaluated during subsequent project review, as applicable, as described on Draft EIR pp. I-6 to I-9, and are not considered here because the Draft EIR analyzes impacts of the proposed Central SoMa Plan and associated rezoning. However, to clarify the description of the 598 Brannan Street project in Draft EIR Chapter III, Plans and Policies, based on the revised Section 321 application, and to ensure consistency with the description of the project as presented in Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, p. IV-8, the following text in the first paragraph on Draft EIR p. III-20 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined; note that other changes are included, which are discussed in Response PP-7 on p. RTC-103):

> Of the other ~~three~~ seven projects, ~~two~~ three are in the Plan Area and are undergoing environmental review: 2.03 million square feet of office space at 610-698 Brannan Street (the Flower Mart site; Case No. 2017-000663); a proposed ~~700,000~~ 1.2 million-square-foot ~~building in the Central SoMa Plan Area~~ development containing approximately 922,300 square feet of office use at 598 Brannan Street (Case No. 2012.0640E); ~~and a four-story, 89,800-square-foot addition to an existing seven-story building at 633 Folsom Street (Case No. 2014.1063)~~ and a mixed-use project including 421,000 square feet of net new office space at 400 Second Street (One Vassar Street; Case No. 2012.1384). The ~~fourth~~ other proposals would create some 1.8 million square feet of office space at the former Pier 70 shipyard; convert 119,600 square feet of PDR space in the San Francisco Armory at 1800 Mission Street to office use; develop approximately 289,000 square feet of office space at 542-550 Howard Street; and develop about 84,500 square feet of office space, along with PDR space, at 552 Berry Street/1 De Haro Street. (Although the Pier 70 project received several approvals in 2017, office allocations at that site will be granted on an incremental basis as development proceeds.)

This proposed change to the Draft EIR does not present significant new information with respect to the proposed Plan, would not result in any new significant environmental impacts or present new feasible alternatives or mitigation measures, and would not result in a substantial increase in the severity of a significant impact identified in the Draft EIR. Therefore, recirculation of the Draft EIR, pursuant to CEQA Guidelines Section 15088.5, is not required.

Comment PP-2: Plan Bay Area Housing Goals

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

I-Hestor-1.9

"**II-4** discusses housing goals in regional plans. Do these goal numbers include San Francisco providing/building housing for reverse commuters from Silicon Valley - Santa Clara and San Mateo county? There has been an explosion of reverse commuters renting or buying San Francisco housing because inadequate housing is being provided on the Peninsula for the expansion of commercial space. Unlike San Francisco - which for over 30 years has required commercial developers to fund housing construction *because the PUBLIC pushed Planning to impose housing and transit fees* - San Mateo and Santa Clara have chosen to let commercial developers off the hook." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.9])*

Response PP-2

The comment requests clarification regarding the housing goal numbers identified in regional plans. As described on Draft EIR p. III-13, "*Plan Bay Area* is driven by the need to meet the growth forecasts identified for the region in a Sustainable Communities Strategy, prepared by the Association of Bay Area Governments [ABAG] and Metropolitan Transportation Commission. *Plan Bay Area* sets out a plan to meet most of the region's growth in Priority Development Areas,[29] (or PDAs), as identified by local governments." Therefore, *Plan Bay Area* considers the need for growth in various PDAs, including within San Mateo and Santa Clara counties.

The criteria outlined regarding 2040 housing projections in the *Plan Bay Area* state that:

> The Plan Bay Area housing distribution is guided by the policy direction of the ABAG Executive Board, which voted in July 2011 to support equitable and sustainable development by "maximizing the regional transit network and reducing GHG emissions by providing convenient access to employment for people of all incomes." This was accomplished by distributing total housing growth numbers to (1) job-rich cities that have PDAs or additional areas that are PDA-like; (2) areas connected to the existing transit infrastructure; and (3) areas that lack sufficient affordable housing to accommodate low-income commuters. The housing distribution directs growth to locations where the transit system can be utilized more efficiently, where workers can be better connected to jobs, and where residents can access high-quality services. Substantial housing production is expected on the Peninsula and in the South Bay, where eight of the top 15 cities expected to experience the most housing growth are located. Two-thirds of the region's overall housing production is directed to these 15 cities, leaving the remaining jurisdictions (more than 90) in the region to absorb only limited growth. This development pattern preserves the character of more than 95 percent of the region by focusing growth on less than 5 percent of the land.[30]

Plan Bay Area does not mandate changes to local zoning; therefore, the degree to which *Plan Bay Area* achieves its land use goals is up to local jurisdictions. However, the housing projections for San Francisco include people commuting to and from various parts of the Bay Area. This is consistent with *Plan Bay Area*'s growth forecasts, which project a concentration of Bay Area growth in both population and employment in the region's three largest cities: San Francisco, Oakland, and San Jose. As the comment does not address the adequacy or accuracy of the Draft EIR, no revisions to the Draft EIR are required.

[29] Priority Development Areas, commonly known as PDAs, are areas within existing communities that local city or county governments have identified and approved for future growth. These areas typically are accessible by one or more transit services; and they are often located near established job centers, shopping districts and other services.

[30] Association of Bay Area Governments, *Plan Bay Area*: Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area 2013–2040, July 18, 2013, *http://files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/0-Introduction.pdf*, accessed May 30, 2017.

Comment PP-3: East SoMa Area Plan at Risk

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

I-Hestor-2.1

"One is I think you're risking the Eastern Neighbors Area Plan exemptions because you've adopted this Eastern Neighborhood's Plan based on the EIR, and you're cutting away and changing the zoning of it. We've already had the 5M; we've had Western SoMa. This one I don't think leaves intact the Eastern Neighborhoods Plan in the EIR." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.1])*

Response PP-3

This comment does not address the adequacy or accuracy of the Draft EIR and, therefore, does not require any revisions to the Draft EIR. The comment expresses an opinion about CEQA environmental review procedures and appears to suggest that, by adopting the Central SoMa Plan in parts of what is now the East SoMa Area Plan (which is within the boundaries of the larger Eastern Neighborhoods Plan Area), the Plan would somehow render inadequate further reliance on the Eastern Neighborhoods Rezoning and Area Plans EIR for support of Community Plan Evaluations in subsequent CEQA review. Community Plan Evaluations are mandated pursuant to CEQA Section 21083.3 and CEQA Guidelines Section 15183 for projects that are consistent with the development density in an applicable area plan. The Central SoMa Plan would rezone a portion of the Western SoMa Area Plan and a portion of the East SoMa Area Plan (Draft EIR Figure III-1, Area Plans in and near the Central SoMa Plan Area, p. III-3). The Eastern Neighborhoods Rezoning and Area Plan EIR evaluated the East SoMa Area Plan along with the Mission, Central Waterfront, and Showplace Square/Potrero Area Plans. If the Central SoMa Plan is adopted, subsequent development projects in the Plan Area that are consistent with the development density provided for in the Central SoMa Plan would be eligible for the Community Plan Evaluation process (CEQA Section 21083.3 and CEQA Guidelines Section 15183). This would not affect the eligibility of projects for the Community Plan Evaluation process within the remaining Eastern Neighborhoods, including the portions of East SoMa and Western SoMa, provided projects meet the following criteria:

1. Are consistent with the development density in the applicable plan *and*
2. Do not result in significant effects not previously identified in the Eastern Neighborhoods Program EIR, including effects peculiar to the project or the project site, off-site or cumulative effects, or effects arising from new information.

The fact that the Central SoMa Plan would supersede portions of both the East SoMa and Western SoMa Area Plans would have no bearing on future applicability of the Eastern Neighborhoods EIR to the remaining portions of East SoMa (or the other areas analyzed in the Eastern Neighborhoods EIR), so long as the analysis for a subsequent development project identifies no new or substantially more-severe impacts than were identified in the Eastern Neighborhoods EIR.

Additionally, as discussed on RTC p. 7, it is possible that a portion of the Plan Area could be designated a Housing Sustainability District. If that were to occur, eligible projects would undergo a ministerial approval process and, therefore, would not be subject to environmental review. However, eligible projects would be required to incorporate applicable mitigation measures from this EIR.

Comment PP-4: General Plan Consistency

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

O-CSN-1.12
O-CSN-1.52

"VI. THE PROJECT IS FATALLY INCONSISTENT WITH THE GENERAL PLAN AND OTHER APPLICABLE PLANNING DOCUMENTS.

"The DEIR incorrectly concludes that the Project is consistent with the General Plan and other applicable planning documents. In fact, the proposed Plan is plainly inconsistent with these planning documents, resulting in significant adverse environmental impacts.

"The City must treat its analysis of conflicts with the General Plan seriously and land use decisions must be consistent with the plan. (CEQA Guidelines, App. G, Evaluation of Environmental Impacts, Item 6; Guidelines § 15125(d); Gov. Code § 65860(a)) The General Plan is intended to be the 'constitution for all future developments,' a 'charter for future development,' that embodies 'fundamental land use decisions that guide the future growth and development of cities and counties.' (*Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors of El Dorado County* (1998) 62 Cal.App.4th 1334, 1335; *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531,54; *City of Santa Ana v. City of Garden Grove* (1979) 100 Cal.App.3d 521,532) The 'propriety of virtually any local decision affecting land use and development depends upon consistency with applicable general plan and its elements.' (*Citizens of Goleta Valley v. Board of Supervisors of County of Santa Barbara* (1990) 52 Cal.3d 553, 570) The consistency doctrine has been described as the 'linchpin of California's land use and development laws; it is the principal which infuses the concept of planned growth with the force of law." *Corona-Norco Unified School District v. City of Corona* (1993) 17 Cal.App.4th 985, 994.

"A project's impacts may be deemed significant if they are greater than those deemed acceptable in a general plan or other applicable planning documents. (*Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416). A significant impact on land use and planning would occur if the project would '[c]onflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.' (CEQA Guidelines Appendix G, § IX(b))

"According to the CEQA Guidelines, 'environmental effects' include direct and indirect impacts to land use and planning. Where the plan or policy was adopted to avoid negative environmental effects, conflicts with the plan or policy constitutes a significant negative impact. (*Oro Fino Gold Mining Corp. v. Co. of el Dorado* (1990) 225 Cal.App.3d 872, 881-882; see also *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4; *County of El Dorado v. Dept. of Transp.* (2005) 133 Cal.App.4th 1376; CEQA Guidelines, App. G., § IX(b)).

Thus, under CEQA, a project results in a significant effect on the environment if the project is inconsistent with an applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating one or more of these environmental effects.

"The DEIR fails to conduct a complete and forthright consistency analysis with the General Plan and other applicable planning documents. The DEIR must be revised to analyze inconsistencies identify appropriate mitigations or set the foundation for a finding of overriding considerations.

"The Plan is inconsistent with Policy 3.5 of the General Plan, which states, 'Ensure that growth will not outpace improvements to transit of the circulation system.' (DEIR P. III-9). The DEIR admits that the Plan would 'result in substantial delays to a number of MUNI routes serving the area,' (DEIR, p. IV.D-49), and 'Development under the Plan … would result in a substantial increase in transit demand that would not be accommodated by local transit capacity, and would cause a substantial increase in delays resulting in adverse impacts on local and regional transit routes.' (DEIR, p. IV.D- 43). This impact to transit is not only a significant impact under CEQA, it is prohibited by the General Plan. The DEIR's conclusion that the Plan does not conflict with this General Plan Policy is arbitrary and capricious.

"The Plan is inconsistent with the Urban Design Element of the General Plan, which states:

> Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development; and
>
> Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction

"(DEIR p. III-10). The Plan allows buildings of 350 feet or more in an area that the City admits is a mid-rise neighborhood. As noted in the Central Corridor Plan, such tall buildings are inconsistent with the mid-rise character of the neighborhood. The City stated in the Central Corridor Plan, at page 32, 'The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.' Having made these statements in the Central Corridor Plan, the City cannot not simply ignore them. The court in the case *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144 rejected a county's argument that a revised initial study prepared by the county which contradicted the findings of the first initial study had not 'relegated the first initial study to oblivion.' Id. at 154. The court stated, 'We analogize such an untenable position to the ***unringing of a bell***. The first initial study is part of the record. The fact that a revised initial study was later prepared does not make the first initial study any less a record entry nor does it diminish its significance, particularly when the revised study does not conclude that the project would not be growth inducing but instead simply proceeds on the assumption that evaluation of future housing can be deferred until such housing is proposed.' (Id. at 154 (emphasis added)). The City cannot conclude that a project may have significant impacts and then, when such admission is no longer convenient, simply change its conclusion to better suit its needs. The City conclusion of 'no inconsistencies' with the General Plan (DEIR, p. III-10) are refuted by its own statements in the Central Corridor Plan.

"The Plan is inconsistent with the Recreation and Open Space Element of the General Plan, Policy 1.9: Preserve sunlight in public open spaces. (DEIR, p. III-11). The DEIR admits that the Plan will create new shadow on several parks under the jurisdiction of the Recreation and Park Department, including South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several public open spaces. (DEIR, p. III-11). For example the DEIR admits that the Plan will create new shadows on the only Rec & Park property in the Plan

area, South Park, and 'could increase shadow on portions of South Park during early morning and late afternoon hours from the spring equinox to the fall equinox (March through September). (DEIR, p. IV.H-35). In other words, the Plan will cast shadows on South Park for half of the year! Similarly, the DEIR admits that the Plan will cast shadows on the heavily used privately owned public open space (POPOS) located at 303 Second Street from noon 'through much of the afternoon,' and shading up to one-third of the POPOS. (DEIR p. IV.H-38). Given these admissions, the DEIR's finding that the Plan is somehow consistent with the General Plan Policy to 'preserve sunlight in public open spaces' is arbitrary and capricious and lacks substantial evidence. Casting additional shadows for half of the year simply cannot be considered consistent with the policy of 'preserving sunlight in public open spaces.'

"The Plan is also inconsistent with the General Plan Objective 9: Reduce transportation-related noise, and Policy 11.1, Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. (DEIR p. III-12). The DEIR admits that 'Development under the Plan, including the proposed street network changes, would generate noise that would result in exposure of persons to noise in excess of standards in the San Francisco General Plan or Noise Ordinance (Article 29 of the Police Code), and would result in a substantial permanent increase in ambient noise above existing levels.' (DEIR, p. S-71). Thus, the Plan will increase transportation-related noise and place new uses in areas that exceed noise guidelines, in direct violation of the General Plan. The DEIR's conclusion of General Plan consistency is therefore arbitrary and capricious.

"The Plan is plainly inconsistent with the Western SoMa Plan, yet the DEIR inexplicably concludes that the Plan would 'not be demonstrably inconsistent with the Western SoMa Plan.' (DEIR, p. III-8). Most obviously, the Western SoMa Plan Policy 1.2.4 is to 'Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street.' (DEIR, p. III-6). The Plan is flatly inconsistent with this Policy, thereby resulting in a significant environmental impact that is not addressed in the DEIR. 'A revised DEIR is required to acknowledge, address and mitigate these plan inconsistencies.'" *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.12])*

"6. The Project is Inconsistent with the General Plan and Other Applicable Planning Documents

"The DEIR must include a complete and forthright analysis of the Projects consistency with the General Plan and other applicable planning documents, ordinances and regulations. Inconsistencies between the Project and the General Plan or other applicable planning documents that were enacted to protect the environment may constitute significant impacts in themselves and can also be evidence of other significant impacts that must be analyzed in the DEIR. In addition, where a Project is inconsistent with the General Plan it may not be lawfully adopted or approved.

"In this case, after discussing only some of the applicable plans, the DEIR incorrectly concludes across the board that the Project will not substantially conflict with any of the plans, policies or other provisions discussed, noting that the Planning Commission and Board of Supervisors would review the Plan for consistency with the General Plan and consider possible amendments to achieve conformity. See DEIR Chapter III and page III-1.

"Some examples of the Project's glaring inconsistency with the General Plan include, but are not limited to, the following:

Plan Provision	Inconsistency
Urban Design Element, General Plan: Policy 3.5: Relate the height of building to important attributes of the city pattern and to the height and character of existing development; and Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction. DEIR at page III-10	The DEIR incorrectly concludes the Project would not conflict with the objectives and policies of the Urban Design Element. There is a clear inconsistency between the Project and the Urban Design Element. The Project (Plan) allows building of 350 feet or more in a neighborhood that is currently mid-rise and planned to remain mid-rise in the Central Corridor Plan. According to the Central Corridor Plan, '[t]he predominant character of Soma as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.' Central Soma Plan at page 32. Holding up this policy direction in the Central Soma Plan are numerous reasons mid-rises rather than high rises are a better fit for the neighborhood and would result in fewer significant impacts. The DEIR's assertion the Project would not be inconsistent with the General Plan (DEIR at page III-10) is undermined by the statements and facts in the Central Corridor Plan and its supporting documents.
Recreation and Open Space Element Policy 1.9: Preserve sunlight in pubic open spaces. DEIR at page III-II.	The DEIR incorrectly concludes the project will not conflict with this policy. There is a clear inconsistency between the Project and this Policy as documented by the DEIR section on Shadows. Specifically, the DEIR states that the Project will create new shadow on several parks in the area. DEIR at page III-II; see also discussion of Shadow section in this letter). In addition, the DEIR Figures show significant new shadows on public streets and POPOS. DEIR pages IV.H-35, IV.H-38, Figures in Section IV.H of the DEIR. Based on evidence in the DEIR, the DEIR incorrectly concludes the Project will no conflict with this Policy.
Western SOMA Plan Policy 1.2.4: Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street.' DEIR at page III-6 As well as other provisions of the Western SOMA Plan	The DEIR incorrectly concludes that the Project would not be demonstrably inconsistent with the Western Soma Plan. DEIR at page III-8. The Project is clearly inconsistent with this policy and therefore clearly inconsistent.
Eastern SOMA Plan	The DEIR incorrectly states that the Project would not be demonstrably inconsistent with the East Soma Plan in part because the applicable parcels in the Plan would be incorporated into the Central Soma Plan. The Project's preference for employment (non-residential) uses is in stark contrast to the objectives (1.2 and 1.2) of the Eastern Soma Plan. Moreover, the Project's proposed substantial growth in employment without a commensurate plan for housing will put significant pressure on the East Soma Plan for additional housing growth not anticipated by the Plan.

"A revised DEIR must include expanded and forthright analysis of the Projects potential inconsistencies with all applicable plans including voter approved propositions, San Francisco's Urban Design Guidelines and the newly adopted TDM Ordinance. Where an inconsistency with a Plan or policy would result in an environmental impact (e.g., shadows, public services, housing demand), those impacts must be analyzed in the appropriate sections of the revised DEIR in a manner consistent with the policy analysis." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.52])*

Response PP-4

The comments include the following:

- A statement that the Draft EIR is not consistent with the General Plan and other applicable planning documents.
- A request that the Draft EIR conduct a consistency analysis with the General Plan and other applicable planning documents, and identify inconsistencies and appropriate mitigation measures or set the foundation for a finding of overriding considerations.
- A statement that the Plan is inconsistent with specific elements of the General Plan including Air Quality Element Policy 3.5, the Urban Design Element, the Recreation and Open Space Element, Environmental Protection Element Objective 9, and the Western SoMa Plan.
- A statement that the Plan is inconsistent with East SoMa Area Plan Objective 1.2.

Consistency with the General Plan

CEQA does not require an analysis of a proposed project's consistency with all plans or policies, but requires an EIR to "discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans" (CEQA Guidelines Section 15125(d)). This consideration of plan inconsistency is part of the discussion of the project's environmental setting, pursuant to CEQA Guidelines Section 15125(d). For purposes of compliance with CEQA, Draft EIR Chapter III, Plans and Policies, describes inconsistencies between the Plan and applicable plans and policies. As noted on Draft EIR p. IV.A-8, a conflict between a proposed project and a General Plan policy does not necessarily indicate a significant effect on the environment under CEQA. CEQA Guidelines Section 15382 defines a significant effect on the environment as "a substantial or potentially adverse change in the physical conditions within the area affected by the project, including land, air, water, minerals, flora fauna, ambient noise, and objects of historic or aesthetic significance." Therefore, for a project to result in a significant impact under CEQA with respect to a conflict with the General Plan or other policies adopted for the purpose of mitigating an environmental effect, the project must be inconsistent or otherwise conflict with a plan or policy adopted for the purpose of mitigating an environmental effect *and* result in a physical environmental effect.

Potential inconsistencies with General Plan policies are discussed further below, under "Consistency of the Proposed Plan with Existing Plans and Policies." However, CEQA does require analysis of a project's physical environmental impacts. Among these physical impacts are those that could result from a conflict with a plan or policy "adopted for the purpose of mitigating an environmental effect," which is one of the significance criteria in Draft EIR Section IV.A, Land Use and Land Use Planning. Inconsistencies resulting in physical effects on the environment are discussed in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures with

mitigation measures identified, where possible. Draft EIR Section IV.A, Land Use and Land Use Planning, explicitly identifies a significant unavoidable physical environmental impact (Impact LU-2) with respect to the San Francisco General Plan Environmental Protection Element, in that the Plan, including the proposed street network changes, would result in increased traffic noise beyond the applicable threshold. Therefore, the Draft EIR found the conflict with General Plan Policy 9.6 would also be ***significant and unavoidable***. The Draft EIR also discusses plans and policies adopted for the purpose of avoiding or mitigating environmental effects in other sections of Chapter IV, including Sections IV.E, Noise; IV.F, Air Quality; IV.G, Wind; IV.H, Shadow; and IV.I, Hydrology. Additionally, plans and policies adopted for the purpose of avoiding or mitigating environmental effects are discussed in the Initial Study in Sections D.8, Greenhouse Gas Emissions; D.13, Biological Resources; D.15, Hydrology and Water Quality; and D.16, Hazards and Hazardous Materials.

Consistency of the Proposed Plan with Existing Plans and Policies

The determination of whether a project is consistent with a specific plan or policy can be subjective and is best made with a broad understanding of the often-competing policy objectives in a planning document. Policy consistency determinations are ultimately made by the City's local decision-making body (i.e., Planning Commission, Board of Supervisors, and other City commissions or departments). Decision makers determine whether the project would be, on balance, consistent with the General Plan. This consideration occurs independent of the environmental review process. As discussed above, policy conflicts are considered significant pursuant to CEQA only when the conflict would result in a significant, adverse physical environmental impact. Potential conflicts with applicable policies are identified in the Draft EIR, to the extent that these impacts result in physical environmental effects.

The commenter states that the Plan is inconsistent with General Plan Objective 9 regarding transportation-related noise. Draft EIR Section IV.A, Land Use and Land Use Planning, specifically identifies a conflict with General Plan Policy 9.6 related to traffic noise as a significant and unavoidable CEQA impact resulting from the Plan. This conclusion is based on the analysis in Draft EIR Section IV.E, Noise and Vibration, which identifies a significant and unavoidable impact related to traffic noise, a physical effect. The Draft EIR also identifies Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects, to reduce the severity of this impact, but even with mitigation, the impact of traffic noise resulting from the proposed Plan would be significant and unavoidable. Thus, the Draft EIR identifies this policy conflict that is based on a physical environmental effect as a significant and unavoidable impact of the Plan.

Consistency with the General Plan Air Quality Element

The commenter correctly notes that a significant and unavoidable transit impact is identified in the Draft EIR. The commenter claims this conflicts with General Plan Air Quality Element Policy 3.5, "Ensure that growth will not outpace improvements to transit of the circulation system." However, three mitigation measures (Mitigation Measures M-TR-3a, Transit Enhancements; M-TR-3b, Boarding Improvements; and M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets[31]) are proposed in the Draft EIR to reduce local and regional transit impacts associated with implementation of the Plan. These physical environmental impacts are disclosed in Draft EIR Section IV.D, Transportation and Circulation, pp. IV.D-35 through IV.D-109. Potential air quality

[31] M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street was removed as a mitigation measure from the Central SoMa Plan EIR as it conflicts with an approved project on Fifth Street that was included in the 2009 Bike Plan.

effects are disclosed in Draft EIR Section IV.F, Air Quality, which concludes that because the Plan would be consistent with regional air quality plans, it would not violate an air quality standard or contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Therefore, Plan effects on air quality would be less than significant. However, subsequent individual development projects could exceed project-specific thresholds for criteria air pollutants, which would result in a significant and unavoidable air quality impact, notwithstanding implementation of Mitigation Measures M-NO-1a, Transportation Demand Management for Development Projects; M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products; M-AQ-3b, Reduce Operational Emissions; and M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps. Additionally, Plan Area development would result in operational emissions of fine particulate matter ($PM_{2.5}$) and toxic air contaminants that would result in exposure of sensitive receptors to substantial pollutant concentrations, also a significant and unavoidable air quality impact, despite implementation of Mitigation Measures M-NO-1a, Transportation Demand Management for New Development Projects; M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-5b, Siting Uses that Emit Particulate Matter ($PM_{2.5}$), Diesel Particulate Matter, or Other Toxic Air Contaminants; and M-AQ-5d, Land Use Buffers around Active Loading Docks.

Consistency with the General Plan Urban Design Element

The commenter references the April 2013 draft of the Plan, which identifies Central SoMa as a mid-rise district and recommends that the presence of high-rises be reduced by limiting their distribution and bulk. This recommendation is reflected in Policies 8.3.3 and 8.3.4 of the Central SoMa Plan, which require buildings where the height exceeds the street width to step back at the upper stories and limits their location to important intersection nodes, respectively. However, the commenter mischaracterizes the discussion in the Plan of Central SoMa being a mid-rise district and prescribing the distribution and bulk of towers as the Plan contradicting itself, and suggests that this contradiction demonstrates the Plan's inconsistency with the Urban Design Element. The Plan notes that Central SoMa is a predominantly mid-rise district, and as such, tall buildings should be subject to distribution and bulk restrictions to ensure they would not adversely affect the mid-rise character of the Plan Area. In other words, the Plan prescribes the distribution and bulk of towers in order to preserve the overall mid-rise character of the district. The commenter also states that the Plan conflicts with Urban Design Element Policy 3.5 (relate the height of buildings to important attributes of the city pattern and to the height and character of existing development) and Policy 3.6 (relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction) and, therefore, conflicts with the Urban Design Element. Draft EIR p. III-10 notes that, "while development in this area would not necessarily relate to the important attributes of the city pattern, it would function to reduce the visual prominence of the elevated freeway." Also, as described in more detail in Section IV.B, Aesthetics, the Plan would not adversely affect public views. As such, the Draft EIR concludes that aesthetic impacts would be less than significant. The commenter has not provided any additional information or evidence to support their claim that the Plan would conflict with a plan or policy adopted for the purpose of mitigating an environmental effect by resulting in physical environmental aesthetic impacts under CEQA.

Consistency with the General Plan Recreation and Open Space Element

The commenter also states that the Plan is inconsistent with the Recreation and Open Space Element (ROSE) of the General Plan because Plan development would cast shadow on South Park and various privately owned public open spaces (POPOS), in particular the one at 303 Second Street. As noted on Draft EIR p. IV.H-35, all new shadow on South Park would be of very limited extent, and new shadow on 303 Second Street would depend on the height and massing of the building projecting its shadow toward the POPOS. The shadow analysis for the Plan was conducted at the programmatic level and considered maximum building envelopes. As stated on Draft EIR p. IV-7, with respect to the physical model used to assess wind and shadow effects of the Plan, "The three-dimensional model does not incorporate fine-grained architectural detailing for each parcel. Instead the model consists largely of simple extrusions of blocks and lots in the Plan Area to represent a buildout condition that reflects base height limits of up to 85 feet. Where heights would be permitted above the 85-foot-limit, building features such as reduced floorplates and upper-level setbacks were incorporated into the model in a manner to reflect Planning Code requirements pertaining to building bulk and mass." The Draft EIR explains that the shadow analysis is therefore conservative, given that subsequent development may be constrained by factors such as Planning Code requirements that require a minimum distance of separation between towers, which is proposed in the Plan Area at 115 feet for towers greater than 160 feet in height, with exceptions allowing a separation of as little as 85 feet under certain conditions. For buildings between 85 feet and 160 feet in height, the Plan calls for Planning Code "skyplane" controls that would require a reduction in the apparent mass of a building when viewed from the sidewalk across the street. Both the tower separation requirement and the skyplane controls would result in some lesser degree of overall building massing than was included in the three-dimensional model relied upon for the shadow analysis. Therefore, the Draft EIR's shadow analysis represents a worst-case assessment of physical impacts and still concludes that the Plan would result in less-than-significant shadow effects. Subsequent development projects in the Plan Area that are consistent with the Central SoMa development density would undergo project-level CEQA review to determine whether or not they would result in significant environmental effects not disclosed in this EIR (Draft EIR p. IV.H-38). Project approvals for subsequent development projects would also be required to be consistent with the General Plan, on balance, and that decision would occur separate from the project-level CEQA review conducted for the project.

Consistency with the Western SoMa Area Plan

With regard to the Western SoMa Area Plan, a conflict with respect to existing zoning designations that prohibit housing and proposed zoning designations that would allow housing would not necessarily result in physical impacts on the environment, as discussed on Draft EIR pp. III-6 through III-8. Furthermore, such zoning designations were not expressly adopted for the purpose of avoiding or mitigating an environmental effect. As stated on Draft EIR p. III-1, "The Planning Commission and Board of Supervisors would review the Plan for consistency with the objectives, policies and principles of the *General Plan* and consider possible amendments proposed to achieve Plan conformity with the *General Plan*." The Central SoMa legislative amendments will include amendments to the Western SoMa Plan to achieve internal consistency with the General Plan, and the decision makers will determine whether or not the Plan is consistent with the General Plan and its subsequent policies.

With regard to the comment that the Plan would conflict with Objective 1.2, Maximize Housing Development Potential in Keeping with Neighborhood Character of the East SoMa Area Plan, see Response LU-4, p. RTC-112.

Overall, for reasons discussed herein, these comments do not require revisions to the Draft EIR. As such, these comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PP-5: History of Prior Planning Efforts

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

I-Hestor-1.6

"There have been a series of prior planning and actions south of Market covering the same area of the Central So Ma Plan. The Project Description **'Plan Vision' text in II** omits mentioning AND fails to show them on a map. Please include in THIS EIR a description of each of the plans (and one intervening implementation). What was goal of the rezoning or plan? Effective date? MAP of resulting heights and zoning classifications. Each planning process occurred with several years of public involvement. Provide approximate start and end dates of each public planning process. And date of adoption of plan/rezoning. Figure 11-1 should be used as model to show area.

Downtown Plan - changed zoning south of Market from industrial and light industrial

Subsequent rezoning of south of Market - staffed by Susana Montana and Paul Lord (several year process fine-tuned South of Market to allow PDR and artist uses in former industrial warehouses, provide space for non profits serving residents and support existing, mostly low-income and family, housing)

Late 90s explosion **of commercial live/work projects**. 5000 total units in industrial areas, over 1000 units in Central SoMa Plan area. Over 5 years of project approvals - bridge between ***Subsequent rezoning*** above and decision to commence ***Eastern Neighborhoods Area Plan***. NO AFFORDABLE HOUSING BECAUSE LIVE-WORK NOT HOUSING - Commercial use REQUIRED. 1:1 parking. NSRs which limited occupancy and use -required commercial tenancy and annual business registration. No attempt made to build out residential neighborhoods.

Eastern Neighborhoods Plan - Please show boundaries map East SoMa and West So Ma on map.

Western SoMa Plan - Please show boundaries on map." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.6])*

Response PP-5

The comment indicates that the Draft EIR does not present or discuss previous planning actions in the Plan Area. The consistency of the Central SoMa Plan with other plans in the area including the East SoMa Area Plan, the Western SoMa Area Plan, and the Downtown Plan is considered in Chapter III, Plans and Policies. A description of each Plan, as well as a brief description of the approval process, is provided in the chapter. Figure III-1, Area Plans In and Near the Central SoMa Plan Area, p. III-3, also shows the boundaries of each of the plans located in the Eastern Neighborhoods and other area plan boundaries. Additional information requested by the commenter regarding prior planning processes is not related to the adequacy and accuracy of the environmental analysis in the Draft EIR; therefore, no revisions to the Draft EIR are required.

Comment PP-6: Office Uses in Central SoMa

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

O-SOMCAN-Cabande.11
O-VEC.9

"**8. The Impacts of New Office Space and Lack of Local Hiring Requirements are Not Properly Presented or Studied in the DEIR**

"The DEIR is inadequate on the grounds that it does not incorporate all the City's policies with respect to office space development controls. Page 111-19 of the DEIR details the City's pipeline of office developments with respect to Planning Code Section 321, which caps large office construction at 950,000 square feet per year. The way that this section 111.C.2 is presented is unclear since there is additional office space development that is not subject to this cap because the cap only applies to 'large office.' Furthermore, this section of the DEIR fails to incorporate the voter approved Proposition O passed in November of 2016, which significantly increased the large office cap to include an increased amount of office space at the Shipyard. The Plan is focused on constructing a massive amount of new office space and essentially makes SoMa a second Financial District (this is true for all the Project Alternatives as well). The DEIR's lack of clarity on how it will comply with Prop M requirements, especially in light of the passage of Proposition O, is a critical flaw.

"Given the intensity of new high-end office space that is being proposed, the fact that 'local hiring and training goals' are still in the section of the DEIR called 'Areas of Controversy and Issues to be Resolved' (p. S-79) is not only offensive to the community, but is potentially very damaging environmentally. With this approach, Planning is saying that new jobs in SoMa will be for people who are not current residents which indicates an in-migration of new people. Planning is also saying that current residents of SoMa will have to move somewhere else to find work. What are the environmental impacts of all this forced migration? This is not analyzed in the DEIR. Also, as new, more affluent people move into SoMa displacing current residents who live and work in SoMa, how much farther will those displaced workers have to travel and what is the resulting environmental impact? Again this is not analyzed in the DEIR." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.11])*

"Moreover, the DEIR fails to address the total amount of square footage of office developments within this plan and whether this is in accordance of Prop M aka Office Development Annual Limit. Although the DEIR briefly addresses the Prop M limitation, we request that the Planning staff addresses how Plan Bay Area affects the current city's legislation in place." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.9])*

Response PP-6

The comments contend that the Draft EIR does not clearly state what office developments are subject to Planning Code Section 321, that Propositions M and O are not appropriately considered, that new jobs will not be

available for current SoMa residents, and that the displacement of residents is not adequately analyzed. The comments also request Planning staff to address how *Plan Bay Area* affects the City's current legislation.

Compliance with Proposition M, passed in November 1986, is governed by Planning Code Section 321. Office developments exempt from Planning Code Section 321 are identified on Draft EIR p. III-19 as buildings smaller than 25,000 square feet. These controls apply to individual projects and not area planning efforts. It is possible that Proposition M and Planning Code Section 321 could limit the overall amount of office space developed over the horizon year for the Plan (2040). However, the Draft EIR assumes that projected office space would be developed during the Plan horizon year to provide a worst-case assessment of the physical environmental impacts of the Plan. An individual project's compliance with Proposition M would be assessed at the time the project is proposed. With regard to the comment requesting staff to address how *Plan Bay Area* affects the City's current legislation, presumably related to the office allocation limits, *Plan Bay Area* does not mandate changes to local zoning; therefore, the degree to which *Plan Bay Area* achieves its land use goals is up to local jurisdictions.

Proposition O passed in November 2016 and exempts new office space at Candlestick Point and most of the former Navy shipyard at Hunters Point from the City's annual 950,000-square-foot limit for office space. Office space approved in these areas would not count toward the City's annual 950,000-square-foot limit governed by Planning Code Section 321. Therefore, Proposition O does not apply to the Central SoMa Plan. However, the Candlestick Point and Hunters Point development program is included in the cumulative assumptions for traffic modeling and subsequent technical topics dependent on traffic in the Central SoMa Plan Draft EIR. As such, physical impacts on the environment associated with this development have been accounted for and disclosed in the Central SoMa Plan Draft EIR.

The comments also assert that new jobs in Central SoMa would be created for people who are not current residents and suggest the displacement of current residents and employees would result in additional environmental impacts not disclosed in the Draft EIR. However, the creation of new office, retail, commercial, and production, distribution, and repair jobs anticipated under the proposed Plan in Central SoMa could actually result in more job opportunities for existing residents. Socioeconomic effects are generally beyond the scope of the CEQA environmental review process unless a link can be established between anticipated socioeconomic effects of a proposed action and adverse physical environmental impacts (CEQA Guidelines Section 15131(a), CEQA Section 21082.2). There is no evidence showing that new residential development under the proposed Plan would cause displacement of existing residents or result in significant adverse environmental effects, such as an increase in regional per capita vehicle miles traveled. See Response OC-1, p. RTC-248, for additional discussion of secondary impacts resulting from the Plan's rezoning.

Comment PP-7: One Vassar Project

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

O-One Vassar.2

"**Page:** **Comment:**
"III-20 The discussion of anticipated Section 321 office allocations on this page should include the One Vassar projects' anticipated 421,000 gsf allocation, as reflected in the application filed with the Planning Department in April 2016." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.2])*

Response PP-7

The comment requests that the One Vassar project be included in the list of Section 321 office allocation square footage-restricted buildings in the Draft EIR. The list presented in the Draft EIR came from the "Office Development Annual Limitation (Annual Limit) Program Update," dated July 22, 2016, which did not include the One Vassar (400 Second Street) project. However, based on revisions to the list since July 22, 2016, as well as revisions to the 598 Brannan Street project addressed on p. RTC-88 under Response PP-1, Draft EIR pp. III-19 and III-20 are revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> As of ~~July 22, 2016~~ January 12, 2018, the Planning Department inventory of office space showed ~~less than half a million (about 444,000)~~ approximately 2.1 million square feet of space available for large projects (those 50,000 square feet and larger), with an additional ~~1.08~~1.02 million square feet available for smaller projects (25,000 to 49,999 square feet).[57] Another 875,000 square feet is added to the large project pool and another 75,000 square feet is added to the small project pool each October (the start of the Section 321 year). The 2012–2013 Section 321 year was the most active in the history of the office allocation program, with 3.6 million square feet of large projects approved (no small projects were approved); the Salesforce (formerly Transbay) Tower at 101 First Street at Mission Street represented 38 percent of this total, at 1.37 million square feet. This building is currently under construction. After a lull in 2013–2014, another 2.2 million square feet of office projects was approved in the 2014-2015 Section 321 year, including "Park Tower" (250 Howard Street) in Zone 1 of the Transbay Redevelopment Area (767,000 square feet; groundbreaking occurred in October 2015) and 633,500 square feet of office space in the 5M Project at Fifth and Mission Streets. Another 1.23 million square feet was allocated in the 2015-2016 Section 321 year, with 86 percent of that going to the 50 First Street ("Oceanwide Center") project. Only 90,000 square feet was allocated in the 2016–2017 approval period, to one large project—expansion of a building at 633 Folsom Street. As of January 2018, no office allocations had been granted in the 2017–2018 Section 321 year.
>
> As of ~~July 2016~~ January 2018, the Planning Department reported ~~four~~ eight large projects with applications pending for allocation of office space totaling ~~1.16~~5.92 million square feet. One project, the proposed conversion of the San Francisco Design Center building at 2 Henry Adams Street from showrooms to office space (246,000 square feet; Case No. 2013.1593), was effectively denied in July 2014 when the Board of Supervisors Land Use Committee tabled a resolution designating the building a City Landmark, an action that was required to allow the office conversion. This action essentially reduced the ~~1.16~~5.92 million square feet of pending space as of ~~November 2015~~ January 2018 to ~~910,000~~5.68 million square feet.
>
> Of the other ~~three~~ seven projects, ~~two~~ three are in the Plan Area and are undergoing environmental review: 2.03 million square feet of office space at 610-698 Brannan Street (the Flower Mart site; Case No. 2017-000663); a proposed ~~700,000~~1.2 million-square-foot ~~building in the Central SoMa Plan Area~~ development containing approximately 922,300 square feet of office use at 598 Brannan Street (Case No. 2012.0640E); ~~and a four-story, 89,800-square-foot addition to an existing seven-story building at 633 Folsom Street (Case No. 2014.1063)~~ and a mixed-use project including 421,000 square feet of office

space at 400 Second Street (One Vassar Street; Case No. 2012.1384). The ~~fourth~~ other proposals would create some 1.8 million square feet of office space at the former Pier 70 shipyard; convert 119,600 square feet of PDR space in the San Francisco Armory at 1800 Mission Street to office use; develop approximately 289,000 square feet of office space at 542-550 Howard Street; and develop about 84,500 square feet of office space, along with PDR space, at 552 Berry Street/1 De Haro Street. (Although the Pier 70 project received several approvals in 2017, office allocations at that site will be granted on an incremental basis as development proceeds.)

The large building inventory reached a maximum of just over 5.1 million square feet available at the start of the 2012–13 allocation period in October 2012. As of ~~July 2016~~ January 2018, the Planning Department has environmental or other applications on file for some ~~6.9~~3.79 million square feet of office space in addition to the 5.92 million square feet of pending office space. The applications on file combined with the pending office space totals more than 9.7 million square feet, which is considerably more than the ~~444,000~~2.1 million square feet available. The largest projects on file include ~~redevelopment of the San Francisco Flower Mart site at Sixth and Brannan Streets, within the Plan Area (approximately 2.0 million square feet), redevelopment of the bayside portion of Pier 70 (approximately 1.8 million square feet),~~ a mixed-use project at Seawall Lot 337 (the San Francisco Giants' "Mission Rock" project on Port of San Francisco Land; approximately 1.3 million square feet), which has received certain approvals but as of January 2018 has not submitted application for allocation of office space; redevelopment of the former Potrero Power Plant site, including approximately 590,000 square feet of office space; and three projects in the Plan Area: an approximately 907,000 square-foot office project at 725–735 Harrison and Fourth Street, ~~also within the Plan Area~~ 823,500 square feet of office space on the site of the San Francisco Tennis Club at Fifth and Brannan Streets, and addition of about 169,000 square feet of office space to a recently constructed building at 505 Brannan Street. There are applications on file for ~~3.8~~5.4 million square feet of office space in ~~seven~~ nine separate projects within the Central SoMa Plan Area, including ~~two~~ three small (less than 50,000 square-foot) projects. It is noted that, with approval of Proposition O in November 2016, office development at Candlestick Point and the former Hunters Point Shipyard is not subject to the annual limit on office development contained in Planning Code Section 321. This could allow for earlier approval of projects elsewhere in the City, including in the Plan Area, given that the Planning Commission had voted in 2010 to give priority in office allocations to projects in the Candlestick Point-Hunters Point project area over other office projects, except for the Salesforce Tower and projects in Mission Bay South.

Footnote:

[57] San Francisco Planning Department, "Office Development Annual Limitation (Annual Limit) Program Update," ~~July 22, 2016~~ January 12, 2018. Allocations in square feet of gross floor area, as defined in Planning Code Section 102.9, *http://zasfplan.sfplanning.org/ANLM/Office_Allocation_Stats.pdf*, accessed ~~October 24, 2016~~ January 26, 2018.

These proposed changes to the Draft EIR do not present significant new information with respect to the proposed Plan, would not result in any new significant environmental impacts or present new feasible alternatives or mitigation measures, and would not result in a substantial increase in the severity of a significant impact identified in the Draft EIR. Therefore, recirculation of the Draft EIR, pursuant to CEQA Guidelines Section 15088.5, is not required.

Comment PP-8: Provide Page Reference When Other Area Plans Referenced

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

I-Hestor-1.7

"Where Central SoMa EIR refers to Eastern Neighborhoods or Western So Ma Plan, please cite to **specific page** of that Area Plan so others can find and review. e.g. **II-3** para 2 of Background refers to pending development of Central Subway related to THIS Central SoMa Area Plan and EIR. Provide reference to page in Eastern Neighborhoods Plan. Similar in Western SoMa Plan which occurred after EN had already been adopted." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.7])*

Response PP-8

The comment requests that page numbers in the East SoMa Plan and Western SoMa Plan be included in the text where these plans are referenced. Draft EIR Section II.A.2, Background, p. II-3, is intended to provide context for the development of the Central SoMa Plan Area based on prior planning processes. The Draft EIR does not specifically reference the East SoMa Plan nor Western SoMa Plan; therefore, no revisions are required.

Comment PP-9: Western SoMa Mixed Use Office (WMUO) Zoning District

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

I-Ferro, A.2

"The zoning for the Central So Ma Plan bounded by Second, Townsend, Sixth and Bryant Streets is proposed to be reclassified as MUO (Mixed-Use District), which allows housing, except for the lots adjacent to the proposed mixed use development on the Flower Market site which would be reclassified to WMUO that does not allow housing. See section 845.20. The location of the lots proposed to be zoned WMUO are close to the Central Subway currently under construction. These lots are within two blocks of Muni Line #8 (Bayshore), within 1 1/2 to two blocks from Muni Line #10 (Townsend) and Muni Line #19 (Polk), within one-half block of the east bound and one block from the west bound Muni Lines #27 (Bryant) and #47 (Van Ness).[1] City's planning policy encourages new housing in locations with easy access to multiple transit lines, the change to WMUO contradicts that policy."

Footnote:

[1] When the Central Subway is completed, [no further text provided in the commenter's footnote]

(Angelo Ferro, Letter, January 26, 2017 [I-Ferro, A.2])

Response PP-9

The comment states that the rezoning of existing Service, Arts, and Light Industrial (SALI) parcels to WMUO is not consistent with the City's planning policy to encourage housing in locations with easy access to multiple transit lines. The parcels to which the commenter is referring currently do not allow residential uses; therefore, the fact that residential uses would not be permitted under the proposed zoning is no different from the existing condition. The rezoning of most of the area to the south and east of these parcels in the Central SoMa Plan to include residential uses would promote new housing in proximity to multiple transit lines, which is consistent with City planning policy.

D.3 Overview

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

- Comment OV-1: Description of Subsequent Development Projects

Comment OV-1: Description of Subsequent Development Projects

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

O-CSPO.11
O-One Vassar.3
O-Tishman.4

"**Page:** **Comment:**
"IV-9 Subsequent Development Projects. The project address labeled '31 Bryant' should be corrected to '531 Bryant'.

The project description for this development should be revised to reflect that it would demolish the two existing buildings at the site, but has proposed two possible options: either (l) complete removal of these structures or (2) potential retention of the existing building façade along Bryant Street." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.11])*

"**Page:** **Comment:**
"IV-9 The 400 Second Street project description should be amended to better reflect the full scope of the One Vassar project, as provided in the current environmental application. The project would merge multiple parcels on the south side of Harrison Street, retain one of the existing buildings (645 Harrison), demolish the remaining four structures, and construct two new buildings and an addition above the existing 645 Harrison structure. The project anticipates construction of two towers reaching heights of approximately 350, and an additional building reaching a height of approximately 200 feet. The project will result in the creation of a midblock passage way connection Harrison and Perry Streets, improvement of the existing Vassar Place, and a new connection from Second Street to Vassar Place and Perry Street. The project would create approximately 380 dwelling units, 500 hotel rooms, and 535,000 gross square feet of office use." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.3])*

"**Page:** **Comment:**
"IV-8 Subsequent Development Projects.

The 598 Brannan Project description should be amended to reflect development of 984,429 square feet of office, and 75,075 square feet of ground floor commercial area (Retail / PDR), and 104,800 square feet of residential (approximately 100 dwelling units). The proposed park area should be amended to approximately 43,000 square feet.

The 655 Fourth Project should be amended to reflect development of two towers extending to a height of approximately 400 feet with below-grade parking." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Tishman Speyer, Letter, February 13, 2017 [O-Tishman.4])*

Response OV-1

These comments identify specific updates or clarifications to project descriptions listed on Draft EIR p. IV-8, under "Subsequent Development Projects." The purpose of this Draft EIR section is to inform the public of specific development proposals within the Plan Area that are contingent upon the proposed Plan's rezoning. As stated on this page, "The EIR analyzes the Plan at a 'program' level of analysis pursuant to CEQA Guidelines Section 15168. … this EIR does not analyze the specific environmental impacts of these [subsequent development] projects. These projects would be subject to their own environmental evaluation …" The following text edits are made to the Draft EIR to clarify particular aspects of these projects, including information from an updated application for the 598 Brannan Street project filed subsequent to the receipt of comments (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

- **598 Brannan Street:** The proposed development would consist of four new buildings containing approximately ~~984,400~~922,300 square feet of office, ~~61,340~~75,000 square feet of ~~retail~~ ground-floor commercial area (Retail/PDR), and ~~104,800~~88,000 square feet of residential (approximately ~~100~~90 dwelling units). Existing buildings to be demolished include the four existing one-and two-story commercial, industrial, and warehouse buildings and associated surface parking lots. The proposed project would also include a new approximately ~~33,000~~38,000-square-foot park at the center of the project site.
- …
- **400 Second Street:** ~~The proposed project would demolish the existing one- to four-story buildings and construct three new buildings.~~ The proposed project would merge multiple parcels on the south side of Harrison Street, retain one of the existing buildings (645 Harrison Street), demolish the remaining four structures, and construct two new buildings and an addition above the existing 645 Harrison Street structure. The project anticipates construction of two towers reaching heights of approximately 350 feet and an additional building reaching a height of approximately 200 feet. The proposed project would result in the creation of a midblock passageway connection between Harrison and Perry streets, improvement of the existing Vassar Place, and a new connection from Second Street to Vassar Place and Perry Street. The proposed project would create approximately 380 dwelling units, 500 hotel rooms, and 535,000 gross square feet of office use, of which 421,000 square feet would be net new office space.
- …
- **531 Bryant Street:** The proposed project would ~~retain the existing façade and construct a new six-story building~~ demolish the two existing buildings on the site, and proposes two possible options: either (l) complete removal of these structures or (2) potential retention of the existing building façade along Bryant Street.

These proposed changes to the Draft EIR do not present significant new information with respect to the proposed Plan, would not result in any new significant environmental impacts or present new feasible alternatives or mitigation measures, and would not result in a substantial increase in the severity of a significant impact identified in the Draft EIR. Therefore, recirculation of the Draft EIR, pursuant to CEQA Guidelines Section 15088.5, is not required.

D.4 Land Use and Land Use Planning

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

- Comment LU-1: Revise Plan Area Boundary Description
- Comment LU-2: Update Regarding Adoption of Transportation Demand Management (TDM) Program
- Comment LU-3: Plan Would Disrupt/Divide Neighborhood
- Comment LU-4: Address Impacts on Neighborhood Character
- Comment LU-5: Add a Mitigation Measure to Require a Notice of Special Restriction (NSR) for Market-Rate/Office Development to Protect Production, Distribution, and Repair (PDR) and Entertainment Uses

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Comment LU-1: Revise Plan Area Boundary Description

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

O-CSPO.12

"**Page:** **Comment:**
"IV.A-1 Plan Area Boundaries and Location. The DEIR describes the Plan area boundary as having its northernmost point at Stevenson and Mission Streets. This description should be revised to incorporate the properties within the Plan area extending to Stevenson and 6th Streets." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.12])*

Response LU-1

The comment accurately identifies that the Plan Area boundary is incorrectly described in the text on Draft EIR p. IV.A-1. Accordingly, the second sentence of the second paragraph on Draft EIR p. IV.A-1 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> … Its boundaries extend from Second Street on the east to Sixth Street on the west, from Townsend Street on the south, and along an irregular northern border that generally jogs along Folsom, Howard, and Stevenson Streets to its northernmost point at Stevenson and ~~Mission~~ Sixth Streets. …

It is noted that the northernmost point of the Plan Area is correctly described in Draft EIR Chapter II, Project Description, on p. II-6.

Comment LU-2: Update Regarding Adoption of Transportation Demand Management (TDM) Program

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

O-CSPO.13

"**Page:** **Comment:**
"IV.A-12 Other Regulations, Bullet #2. This bullet should be updated to reflect adoption of the TDM Program in 2017." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.13])*

Response LU-2

The comment states that the reference to the City's TDM Program should be updated to reflect adoption of this program by the Board of Supervisors. The City's TDM Program was adopted on February 7, 2017, and became effective on March 19, 2017, subsequent to publication of the Draft EIR on December 14, 2016. Therefore, the following revisions are made to the Draft EIR (deleted text is shown in ~~strike through~~; new text is double-underlined):

On p. IV.A-12, the second bullet is revised as follows:

- *Planning Code* provisions concerning off-street parking and loading and~~, assuming they are enacted by the Board of Supervisors in 2016~~ transportation demand management, as discussed in Section IV.D, Transportation and Circulation.

On p. IV.D-23, the last bullet is revised as follows:

- Encourage Sustainable Travel. This component of the Transportation Sustainability Program would help manage demand on the transportation network through a Transportation Demand Management (TDM) Program, making sure new developments are designed to make it easier for new residents, tenants, employees, and visitors to get around by sustainable travel modes such as transit, walking, and biking. Each measure that would be included in the TDM program is intended to reduce VMT traveled from new development. Resolution No. 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016~~, and the Planning Code amendments have been forwarded to~~. On February 7, 2017, the Board of Supervisors approved Ordinance No. 34-17, which the Mayor signed on February 17, 2017, adopting the TDM Program. The TDM Program became effective on March 19, 2017~~ for legislative approval~~.

On p. IV-D.40, the last two sentences are revised as follows:

> … As noted above, on February 7, 2017, ~~the Planning Department is currently pursuing an ordinance amending the *Planning Code* to establish a citywide TDM Program. Resolution 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016. If the proposed *Planning Code* amendments are legislated by~~ the Board of Supervisors approved Ordinance No. 34-17, adopting a citywide TDM Program. Therefore, development projects within the Plan Area would be subject to the requirements of the TDM Program.

On p. IV-D.107, the last two sentences of the first partial paragraph are revised as follows:

> … As noted in section "Regulatory Framework" above, on February 7, 2017, ~~the Planning Department is currently pursuing an ordinance amending the *Planning Code* to establish a citywide TDM Program. Resolution 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016. If the proposed *Planning Code* amendments are legislated by~~ the Board of Supervisors approved Ordinance No. 34-17, adopting a citywide TDM Program. Therefore, development projects within the Plan Area would be subject to the requirements of the TDM Program.

On p. IV-E.22, the first full sentence of the first partial paragraph is revised as follows:

> … The TDM Program Standards and accompanying appendices ~~are expected to~~ may be refined by the Planning Commission from time to time ~~as planning for the proposed TDM Ordinance continues~~. …

The same revision is made in the Table S-1 on p. S-29.

On p. VI-10, footnote 422 is revised as follows:

> [422] ~~As noted in Chapter II, Project Description, the City is anticipated to~~ The Board of Supervisors, on February 7, 2017, adopted an ordinance ~~by end of 2016~~ that ~~would~~ mandates TDM Programs in many new development projects.

On p. VI-55, footnote 432 is revised as follows:

> [432] ~~As noted in Chapter II, Project Description, the City is anticipated~~ The Board of Supervisors, on February 7, 2017, adopted an ordinance ~~by end of 2016~~ that ~~would~~ mandates TDM Programs in many new development projects.

Comment LU-3: Plan Would Disrupt/Divide Neighborhood

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

> O-CSN-1.2

"However, the type of development outlined in the current Plan is quite likely to retard the current transformation of this neighborhood. Rather than developing into high density residential and mixed use neighborhood stretching from Mission Bay to downtown, the current plan proposes to cut the Central SoMa neighborhood off from the neighborhoods to the south and essentially isolate it." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.2])*

Response LU-3

The comment expresses an opinion that development pursuant to the Plan would "cut off" and isolate the Plan Area from neighborhoods to the south.

The commenter provides no additional information or evidence of how development pursuant to the Plan would "cut off" or "isolate" the Plan Area from areas to the south. As explained in Impact LU-1, Draft EIR

p. IV.A-9, the Plan would not physically divide an established community. The Plan's proposed zoning changes may result in changes to land use patterns as subsequent development projects are implemented pursuant to the Plan, but would not result in physical barriers to established communities either within or surrounding the Plan Area. As identified in the Draft EIR p. IV.A-9, the proposed street network changes (including improvements to mid-block alleys and mid-block crosswalks) could

> … decrease existing physical barriers in the Plan Area by reducing the length of many of the Plan Area block faces and thereby facilitating pedestrian movement through the neighborhoods. Furthermore, the substitution of traffic lanes with transit-only lanes and bicycle lanes/cycle tracks, widening of sidewalks, installation of mid-block crosswalks, and reopening of closed crosswalks would remove barriers to circulation within the neighborhood, especially for non-automobile modes, which would be beneficial for neighborhood connectivity.

As explained below in Response LU-4, the Draft EIR also concludes that the Plan would also have a less-than-significant effect with respect to the visual character of the Plan Area.

Comment LU-4: Address Impacts on Neighborhood Character

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

O-VEC.8

"Although the DEIR briefly addresses that the Central SOMA Plan will conflict with East SoMa Plan, it did not resolve the proposed high-rise developments of the proposed area plan to mid-rise residential plan of Eastern Neighborhood Plan, such transitions should be addressed in how will this affect the character of the neighborhood." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.8])*

Response LU-4

The comment states that the Draft EIR fails to address effects on neighborhood character that could result from development of high-rise buildings in and adjacent to the existing East SoMa Plan Area.

As stated on Draft EIR p. IV.A-8, "Potential effects regarding the character of the Plan Area and vicinity are addressed in this EIR only to the degree that such effects relate to physical environmental changes. Such changes are addressed in Section IV.B, Aesthetics, and Section IV.C, Cultural Resources. Other effects of the Plan in relation to land use character are, in general, social or economic effects. Refer to Chapter V, Other CEQA Considerations, for further information about how social and economic effects are addressed by CEQA."

As shown in Draft EIR Figure III-1, Area Plans in and near the Central SoMa Plan Area, p. III-3, East SoMa is an irregularly shaped area that generally extends south from Folsom Street and west from Fourth Street; East SoMa also includes the area bounded generally by Mission, Fifth, Harrison, and Seventh streets, with a connecting link between these two areas in the northern two-thirds of the block bounded by Folsom, Fourth, Harrison, and Fifth streets. East SoMa includes portions of the proposed Central SoMa Plan Area and also extends east,

southeast, and west of the Central SoMa area. As shown in Draft EIR Figure II-8, Generalized Height Limits, Existing and Proposed Height and Bulk Districts, p. II-20, the Plan proposes only two locations of substantial increases in height limits north of Harrison Street, except east of Third Street, which is already developed with taller office and residential buildings. Conversely, the Plan would increase height limits to between 130 feet and 400 feet in the area generally bounded by Bryant, Third, Townsend, and Sixth streets and adjacent to the elevated I-80 freeway east of Fourth Street.

With regard to aesthetic impacts, Impact AE-1, Draft EIR p. IV.B-33, concludes that the Plan would not substantially degrade the visual character or quality of the Plan Area, identifying this impact as less than significant. As stated on Draft EIR p. IV.B-34, "Although the diverse scale and mid-rise character of much of the Plan Area would be retained, implementation of the Plan would result in changes both to the cityscape and on ground level. Taller buildings in specific clusters would reinforce the existing street grid-oriented development patterns and the locations of transit, but would concentrate visual changes at specific locations. At the ground level, there would be a perceptible change in both pedestrian and vehicular activity, owing to the introduction of higher-density development. However, while these changes would be noticeable, they would not necessarily be considered adverse."

Impact CP-1, Draft EIR p. IV.C-54, analyzes effects of the Central SoMa Plan on historic architectural resources and states, "While the Plan includes a number of policies to protect historic resources, and neighborhood character, which could protect individual resources or historic/conservation districts, one of the Plan's primary goals is to increase the capacity for jobs and housing (Goal 1). The Plan would accomplish this by increasing height limits and replacing exi[s]ting zoning districts that restrict the capacity for office and residential development with zoning that supports office and residential development. These policies could affect individual historic resources and/or historic/conservation districts as discussed below." The Draft EIR concludes that implementation of the Plan could result in material impairment to both individual historical resources and to historic districts, even with mitigation. Therefore, the Draft EIR concludes that development under the Plan would result in significant and unavoidable impacts on historical resources.

The commenter has not provided any additional information or evidence of how the proposed changes in zoning heights could result in physical environmental effects not already disclosed in the Draft EIR.

Comment LU-5: Add a Mitigation Measure to Require a Notice of Special Restriction (NSR) for Market-Rate/Office Development to Protect Production, Distribution, and Repair (PDR) and Entertainment Uses

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

I-Hestor-1.11
I-Hestor-2.7

"South of Market rezoning after Downtown Plan adoption had unexpected result in approval of over 5,000+ units of commercial live/work several years later in late 1990s in areas historically zoned for light industry. The South of Market rezoning had made legal conversion or construction of new live/work. In reaction to community

push back on what was perceived as upper end HOUSING, Planning took an important interim step. The Commission/Department developed and imposed NSRs [Notices of Special Restrictions] on most live/work units. Nearly all of the units and NSRs were in the Southeast Quadrant. The quadrant leader should have access to and knowledge of the NSRs and how compliance has been monitored. Except for a very small area of the South of Market, new housing required a Conditional Use. Because live/work was a PERMITTED commercial use it did not require CU approval nor provide any affordable housing.

Over 1,000 of the total 5,000 live/work units were built in the Central SoMa Plan Area. Many had NSR conditions which addressed concerns about new residents of commercial spaces coming into an light industrial area where there were existing PDR and other uses which would have some conflicts with new live/work residents. NSRs designed to head off conflicts.

Requested mitigation measure to notify of pre-existing mixed use nature of Central SoMa.

The Department should have in its files the language of the NSRs PLANNING imposed on live/work projects.

To expand uses and heights into areas that have uses and occupants that are PDR, industrial, services for low and moderate income people, a mitigation measure to ensure protection of legal preexisting uses is needed. Given experience with live/work NSRs, the NSRs need to be signed AND RECORDED by each succeeding owner or resident of a new building - at a minimum market rate housing and commercial office. The RECORDED NSR should advise signer that they are moving into an area that had been for decades has been zoned for industrial use. That non-profit agencies had been owners and occupants of Central SoMa for decades so that low income persons and nearby areas could be served. That THEY, residents of new market rate housing and occupants of office buildings, are the interlopers. In my words, they should not bitch about others who have already been operating legally in the area as a permitted use. Imposition of a mitigation measure that must be signed AND RECORDED by successive condo owners, and required to be signed by office tenants, would allow mixed uses to continue, along with long term residential tenancies by lower income people.

"I specifically refer to the language imposed on the project at 1000 Pennsylvania (AB 4224, Lot 42) which acknowledges the presence of industrial uses in that industrially zoned area with an aim to protect the uses. Language based on the following should be required:

> The property owner and all successors in ownership of (office building, market rate housing, etc) shall disclose in writing, and require a signed AND RECORDED acknowledgment therefor[e] and, for tenants, such disclosure shall be included in the signed lease agreement that:
>
> (A) the project was built on property which was zoned (here need history of zoning back to industrial zoning pre-downtown Plan, and what uses were permitted up to Central SoMa Plan zoning) and that property, when approved for the subject project, was surrounded by a mixture of residential, commercial (including nighttime entertainment) and industrial uses;
>
> (B) that industrial use and the jobs they generate are important to San Francisco;
>
> (C) that the nature of industrial use is often noisy, odorous, and operate at all hours of the day or night, on all days of the year, and often locate in industrial areas;
>
> (D) that activities permitted in an (M-1 Light Industrial Zoning District - modify) generate noise from patrons and other entering and departing the area at all hours;

(E) that surrounding industrial facilities may generate other circumstances and conditions that may be considered by some people as offensive to market rate housing or office use;

(F) that there exist numerous nightclubs and restaurants in the nearby area.

"This mitigation measure requiring a signed RECORDED NSR - which is binding on all subsequent owners or tenants - should be imposed on any market rate housing or office development in Central SoMa." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.11])*

"And I want a proposed mitigation for all offices and new market-rate housing, that do-not-bitch condition because this is a former industrial area. There are services for low-income residents, and there are PDR uses.

"The Planning Commission imposed a do-not-bitch condition on the live-work projects so people that move into these new housing units can't complain about the people that were there now that are PDRs and residential serving Mission.

"That is not a bad word; I understand it." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.7])*

Response LU-5

The comment recommends the addition of a mitigation measure that would require recording of a Notice of Special Restrictions on the title of new market-rate residential and office projects in the Plan Area. The commenter's proposed Notice of Special Restriction would require new residents and office occupants to acknowledge the potential disruptive influence of noise, odors, night lighting, and the like from existing industrial, light industrial, and entertainment uses (such as nightclubs). The commenter cites the development during the 1990s of live/work units in the South of Market (SoMa) neighborhood, including the Plan Area, and the resulting conflicts between residents of these live/work units and pre-existing light industrial and entertainment uses over issues such as noise, odors, and late-night/early morning activity.

The commenter's request to add a mitigation measure requiring a Notice of Special Restriction on the title of new market-rate residential and office projects in the Plan Area is not warranted because: (1) equivalent notice would be required under the Administrative Code; (2) the EIR does not identify a significant land use impact related to conflicts between new residential or hotel uses and existing PDR uses; and (3) requiring such notice would not be an effective mitigation measure in any case because preventing complaints about land use conflicts would not resolve the conflicts for the reasons discussed below.

The live/work units permitted in San Francisco in the 1990s were defined as commercial space, rather than residential units. This led to a number of consequences, among them that live/work units were developed—and functioned effectively as residences—in parts of SoMa that did not permit residential use, such as the Service/Light Industrial (SLI) Use District, or permitted residential use only conditionally, such as the Service/Secondary Office (SSO) Use District. Another consequence, and a direct result of live/work units being considered commercial uses, was that live/work units developed in the 1990s were not required to be constructed to comply with San Francisco Building Code standards for residential development. This, at least

potentially, meant that live/work units could have been more susceptible to relatively high exterior noise levels because these units did not have to meet interior noise standards that apply to residential development.[32]

In 2002, the Board of Supervisors effectively prohibited further development of the type of live/work units permitted throughout the 1990s through passage of Ordinance 56-02, which amended Planning Code Section 233(a) to state that no live/work unit could be permitted except as an accessory use to, and integrated with, "the working space of artists, artisans and other craftspersons." Section 233 was again amended in conjunction with adoption of the Eastern Neighborhoods rezoning in 2008 (Ordinance 298-08), with the intent of prohibiting new live/work units. In addition, most mixed-use districts approved in conjunction with adoption of the Eastern Neighborhoods and Western SoMa plans—including RED, SPD, MUG, MUR, MUO, UMU, WMUG, WMUO, SALI, and RED-MX—expressly prohibit new live/work units, and such prohibitions would extend to the Central SoMa Plan Area, where the applicable use districts would primarily comprise MUO, WMUO, MUG, SALI, and SPD, along with small areas of NCT-SOMA and C-3-O.[33] Accordingly, the commenter's concerns about potential noise-generated conflicts are not relevant with respect to new residential development in the Plan Area. New residential development is subject to interior noise standards contained in the California Building Code and requirements specific to the San Francisco Building Code, as described on Draft EIR pp. IV.E-10 and IV.E-12. As explained on Draft EIR p. IV.E-18, potential effects from exterior noise would be less than significant with respect to new development in the Plan Area as a result of compliance with these standards, as well as noise standards applicable to non-residential noise-sensitive uses.

Some of the commenter's concerns have previously been addressed through a number of actions taken by the City. In 2015, the City enacted an ordinance (Ordinance 70-15) to reduce noise conflicts between Places of Entertainment (e.g., nightclubs) and residential uses. As stated on Draft EIR p. IV.E-13, the ordinance:

> … made amendments to the *San Francisco Building Code*, *Administrative Code*, *Planning Code*, and *Police Code* that require attenuation of exterior noise for new residential structures and acoustical analysis; to require a process of consultation between the Planning Department and the Entertainment Commission regarding proposed residential uses within 300 feet of Places of Entertainment, including notifying a potential residential project sponsor if there are nearby Places of Entertainment; to allow the Entertainment Commission to conduct a hearing, attended by the residential project sponsor, on such a project and to provide comments and recommendations to the Planning Department regarding the project; to require the Planning Department to consider noise issues in reviewing the project; to preclude a Place of Entertainment from being declared a public or private nuisance on the basis of noise for residents of residential structures developed since 2005; and to require disclosure to residential renters and buyers of potential noise and other inconveniences associated with nearby Places of Entertainment. Additionally, the Entertainment Commission is authorized to impose noise conditions on a permit for a Place of Entertainment, including noise limits "that are lower or higher than those set forth in Article 29" of the *Police Code*.

Further revisions were made to the Administrative Code and Planning Code in 2017 to require the same procedures with respect to new hotels and motels locating near Places of Entertainment.

[32] Another consequence, although not a physical impact on the environment, was that live/work units were not subject to school impact fees assessed by the San Francisco Unified School District on new residential development.

[33] RED = Residential Enclave; SPD = South Park; MUG = Mixed Use, General; MUR = Mixed Use, Residential; MUO = Mixed Use, Office; UMU = Urban Mixed Use; WMUG = Western SoMa, Mixed Use, General; WMUO = Western SoMa, Mixed Use, Office; SALI = Service/Arts/Light Industrial; and RED-MX = Residential Enclave Mixed Use.

Regarding the provisions recommended by the commenter, Supervisor Kim has introduced language for codification in the Administrative Code that would protect light industrial and other PDR uses from potentially incompatible adjacent and nearby residential and hotel/motel development. Specifically, in existing Service/Light Industrial (SLI) and Service/Arts/Light Industrial (SALI) Use Districts, the language would require that sale or lease of a residential or hotel/motel project be accompanied by a "Disclosure of Neighboring PDR Uses" that warns the buyer or lessee that such a nearby use "may subject you to inconveniences or discomfort arising from or associated with their operations, which may include, but are not limited to: noise, odors, dust, chemicals, smoke, operation of machinery, and loading and unloading operations, which may occur throughout the day and night. One or more of these types of inconveniences may occur even if the PDR Use is operating in conformance with existing laws and regulations and locally accepted customs and standards for operations of such use." Therefore, the buyer or lessor "should be prepared to accept such inconveniences or discomfort as normal and a necessary aspect of living in a neighborhood with mixed PDR and residential Uses. A PDR Use shall not be considered a public or private nuisance if it operates in compliance with the Municipal Code and state and federal law, and with the terms of its permits."[34]

Concerning the 1000 Pennsylvania Street project (Case No. 1998.076E), it is noted that the mitigated negative declaration did not identify significant impacts with respect to land use incompatibility, noise, odors, or lighting, and no mitigation measures were required pursuant to CEQA for these impacts. (Mitigation measures were identified to reduce generation of fugitive dust during construction, ensure the evaluation of and, if necessary, proper handling of potentially contaminated soil, and avoid impacts on potential archeological resources.) The disclosure requirement noted by the commenter was added as a condition of project approval by the Planning Commission on June 17, 1999. The Planning Commission and/or Board of Supervisors, in their deliberations on the proposed Plan, could choose to impose comparable notification requirements for development in the Plan Area, but such a requirement is not mandated by CEQA.

[34] The proposed Administrative Code language is subject to modification and approval by decision makers.

D.5 Aesthetics

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

- Comment AE-1: Address Maximum Building Heights
- Comment AE-2: Conclusion Regarding Aesthetics Impacts
- Comment AE-3: One Vassar Project

Comment AE-1: Address Maximum Building Heights

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

O-CSPO.14
O-CSPO.15

"**Page:** **Comment:**
"IV.B-33 Development Under the Plan. The discussion of maximum development heights in this section should address draft Plan Implementation Measure 8.5.1.2." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.14])*

"**Page:** **Comment:**
"IV.B-37 Impact AE-2 Discussion. The third paragraph in this section states that the Plan would allow for approximately eight towers of between 200 and 400 feet in height on certain sites south of Bryant. The range of potential sites allowing for development of 130 feet in height or greater should also be considered in this section." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.15])*

Response AE-1

The comments state that the analysis of aesthetics impacts should consider Plan Implementation Measure 8.5.1.2, which would allow for an additional 25 feet of height on certain parcels. The comments also state that the analysis should consider potential development of 130 feet in height or greater in addition to the approximately eight towers of between 200 and 400 feet in height that would be permitted by the Plan on certain sites south of Bryant Street.

As stated in Response PD-2, p. RTC-45, the Draft EIR Project Description on p. II-23 explains that an additional 25 feet of height would be allowed for certain subsequent development projects, under certain conditions, in exchange for public benefits such as the provision of affordable housing and/or public open space beyond what would otherwise be required by the Plan. The potential for the additional 25 feet in height is derived from the Plan's Implementation Strategy (Part II of the Plan). Specifically, Plan Part II Section A, Implementation Matrix, includes Implementation Measure 8.5.1.2, which states, "An additional 25 feet of height may be permitted on

sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow."

As explained in Response PD-2, it is unknown at this time which sites would seek the additional 25-foot height increase in exchange for development of open space or affordable housing and, if so, where on the site(s) the added height would occur. Moreover, an additional 25 feet in height (two office floors) would not be readily apparent in the long-range visual simulations (Figures IV.B-13 to IV.B-16, pp. IV.B-20 to IV.B-23), would be minimally apparent in the mid-range simulations (Figures IV.B-17 to IV.B-19, pp. IV.B-24 to IV.B-26), and would not be visible at all in the short-range simulations (Figures IV.B-20 to IV.B-23, pp. IV.B-28 to IV.B-31). The additional height also would not alter the Draft EIR's conclusion that aesthetic impacts of the Plan would be less than significant.[35] As such, revisions to the Draft EIR to address this comment are not required.

Regarding the potential for height increases to heights of less than 200 feet, this is included in the analysis in the Aesthetics section on Draft EIR p. IV.B-33, "In addition, increased height limits would also be allowed in the area bounded by Bryant Street to the north, Fourth Street to the east, Townsend Street to the south, and Sixth Street to the west from 85 feet (or lower) to up to 160 feet." To clarify the proposed height limits north of Bryant Street (as explained on p. II-7, the Draft EIR conservatively analyzes higher height limits than are shown in the 2016 draft Plan for several parcels), the sixth sentence of the first paragraph beneath the heading "Development under the Plan" on Draft EIR p. IV.B-33 is revised as follows (new text is double-underlined):

> … The Plan, as analyzed in this EIR, would also allow for towers between 200 and 350 feet in height on the north and south sides of Harrison Street between Second and Third Streets (interspersed on the north side with a height limit of 130 feet and on the south side with height limits of 130 feet and 160 feet), a tower of 240 feet at the southeast corner of Fourth and Harrison Streets, a tower of 200 feet in height on the northeast corner of Third and Harrison Streets, a 180-foot tower at the northwest corner of Fourth and Folsom Streets, and a 300-foot-tall tower on the southwest corner of Fifth and Howard Streets. …

Comment AE-2: Conclusion Regarding Aesthetics Impacts

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

O-CSN-1.26

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[35] The following information is provided for informational purposes only regarding the limits of aesthetics as a CEQA topic to be analyzed in future projects. Pursuant to CEQA Section 21099, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

a) The project is in a transit priority area;

b) The project is on an infill site; and

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

Most, if not all, subsequent development projects under the proposed plan would meet each of the above three criteria. Thus, project-level CEQA review for such projects would not consider effects on aesthetics or parking.

"C. The Plan will have Significant Adverse Visual Impacts that are not Disclosed or Analyzed in the DEIR.

"The Plan will have significant adverse visual impacts because it conflicts with height and bulk prevailing in the area. As discussed above, the Plan is inconsistent with the Urban Design Element of the General Plan, which states:

> Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development; and
>
> Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction

"(DEIR p. III-10). The Plan allows buildings of 350 feet or more in an area that the City admits is a mid-rise neighborhood. This is not only inconsistent with the General Plan, but also with the Plan's own Goal 8.3: 'Reinforce the character of Central SoMa as a mid-rise district with tangible "urban rooms.'" (DEIR, p. II-23). The DEIR states, 'some observers could be more keenly aware of any increase in building height or overall density, and these observers could find these changes substantially disruptive.' (DEIR, p. IV-B.32). The DEIR states that the 'Plan would seek to retain the character of the mid-rise district, limiting the presence of high-rises to areas near transit stations,' (DEIR, p. IV.B-34), yet by allowing 350 [-foot-tall] buildings on Second and Harrison, the Plan violates this principle.

"As noted in the Central Corridor Plan, such tall buildings are inconsistent with the mid-rise character of the neighborhood. The City stated in the Central Corridor Plan, at page 32, 'The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.' The Central Corridor Plan also stated:

> Given the amount of high-rise space recently enabled through the Transit Center District Plan and goals to build on and complement the character of SoMa, this Plan does not envision high rise development as a major component of the Central Corridor Plan. Rather, it promotes the kind of mid-rise development that is more in line with SoMa's current character and can also enable the large floorplate work spaces that are in high demand, yet difficult to find and secure, in central City locations.
>
> In general, the mid-rise heights set by the plan provide for the same, and in some cases even more, density that would be provided with taller buildings. The large floor-plates possible on large development sites, combined with heights ranging from 8 to 12 stories, enables a significant amount of density. Conversely, the combination of necessary bulk limitations, tower separation requirements for high rise buildings and the realities of designing elegant tall buildings that maximize light, air and views to both tenants and the neighborhood, limits the amount of incremental additional development possible with a tower prototype. For instance, on a 100,000 square foot site, a mid-rise building at 130 feet in height would yield more development space than two 200-foot towers constructed above an 85-foot base on the same site.
>
> However, to enable the option for more high-rise buildings, the Plan does include a High Rise Alternative, which amplifies height limits in certain areas, expanding opportunities for buildings taller than 130 feet.

"Central Corridor Plan, p. 116. Having made these statements in the Central Corridor Plan, the City cannot not simply 'unring the bell.' *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144. The DEIR's conclusion that the Plan has no significant visual impacts is arbitrary and capricious and ignore the conflicts with the General Plan. (DEIR, p. IV.B-33).

"By allowing very tall buildings throughout the Plan area, the Plan conflicts with the Urban Design Element, and creates a significant aesthetic impact on the neighborhood. This impact must be disclosed and mitigated in a revised DEIR. The most obvious [way] to reduce this impact is for the City to adopt the Reduced Height (Mid-Rise) alternatives." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.26])*

Response AE-2

The commenter disagrees with the Draft EIR's conclusions that aesthetic (visual) impacts of the Plan would be less than significant. The commenter cites alleged inconsistencies with the General Plan Urban Design Element and text from the 2013 draft Central Corridor Plan in support of his position.

Regarding the Urban Design Element, Draft EIR Chapter III, Plans and Policies, sets forth the same two policies noted by the commenter but reaches a different conclusion:

> The Plan proposes to intensify development along and proximate to the new Central Subway line, currently under construction, including substantial increases in building heights at select locations—up to a maximum of 400 feet. In addition, several parcels north of the I-80 freeway and east of Fourth Street would be zoned to a maximum of 300 feet. While development in this area would not necessarily relate to the important attributes of the city pattern, it would function to reduce the visual prominence of the elevated freeway. As described in more detail in Section IV.B, Aesthetics, the Plan would not adversely affect public views. Therefore, no inconsistencies have been identified and the Plan would not conflict with the objectives and policies of the Urban Design Element. (Draft EIR p. II-10)

See Response PP-4, p. RTC-96, for additional information concerning General Plan consistency.

A policy conflict does not, in and of itself, indicate a significant impact under CEQA:

> A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any physical environmental impacts that could result from a conflict with General Plan policy(ies) are analyzed in this Draft EIR. In general, potential conflicts with the General Plan are considered by the decision makers (in the case of a General Plan amendment, the Planning Commission and Board of Supervisors) independently of the environmental review process. In addition to considering inconsistencies that affect environmental issues, the decision makers consider other potential inconsistencies with the General Plan as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified in this environmental document would be considered in that context and would not alter the physical environmental effects of the Plan and proposed street network changes and open space improvements that are analyzed in this EIR. (Draft EIR, p. II-2)

The Draft EIR fully analyzes visual effects in Section IV.B, Aesthetics, and concludes that impacts would be less than significant.

Furthermore, the comments conflate CEQA case law concerning two iterations of an initial study with Planning Department policy deliberations by claiming that statements in the 2013 draft Central Corridor Plan are somehow controlling on current policy. The 2013 draft Central Corridor Plan, which was the Planning Department's first draft of what is now the 2016 draft Central SoMa Plan, was not a CEQA document and did not purport to analyze environmental impacts in accordance with CEQA. Therefore, it has no bearing on the project's environmental analysis under CEQA. As required by CEQA, the Draft EIR provides substantial

evidence in the form of visual simulations and analysis for its conclusion that no significant aesthetic impact would occur. The commenter has not demonstrated that the Draft EIR's determination that the Plan would not result in a significant aesthetic impact is not supported by substantial evidence in the record.

The commenter incorrectly claims that the 2016 draft Plan changes the Planning Department's intent from development of a primarily mid-rise neighborhood with limited high-rise development, and that the 2016 Plan would "allow very tall buildings throughout the Plan area." Height limits would remain 85 feet or less on all or nearly all of eight blocks or partial blocks, and two-thirds or more of seven additional blocks, with height limits greater than 85 feet occupying 50 percent or more on only four blocks or partial blocks (Draft EIR Figure II-8, Generalized Height Limits, Existing and Proposed Height and Bulk Districts, p. II-20). In addition, the 2016 draft Plan discusses maintaining the largely mid-rise character of the Plan Area under Objective 8.3, Reinforce the Character of Central SoMa as a Mid-Rise District with Tangible "Urban Rooms," which states:

> One of the most common building forms is the 'mid-rise' building of five to eight stories (65 to 85 feet), characteristic of its industrial and warehouse legacy. These mid-rise buildings have proven to have great longevity, because their large floors and high ceilings are attractive to a range of uses. … In SoMa, these mid-rise buildings create a comfortable 'urban room' – which is when the perceived height of the building is approximately equivalent to the width of the street. … Currently, height limits on major streets are too low to support mid-rise development. These height limits should be adjusted to enable mid-rise development, except where there is an important civic asset that lower heights would benefit. … Buildings in Central SoMa should be designed to be mindful of creating and preserving the urban room. … Buildings that exceed the height of the urban room will contribute to the neighborhood's mid-rise character if the predominance of their mass and height is not visible or dominant from the street. Additionally, there should be sufficient light, air, and sense of openness between buildings. Therefore, the City should require massing and design strategies that reduce the apparent mass of buildings above a height of 85 feet and should require adequate spacing between towers. … Limit the distribution and bulk of new towers and focus them at important nodes. By efficiently using land, new towers (i.e., buildings taller than 160 feet in height) are helpful to fulfilling the Plan's goal to increase the capacity for jobs and housing (as discussed in Goal 1). However, as a mid-rise district, such towers should not be permitted to dominate the landscape. To do so, the number of towers should be limited. Additionally, these towers should be located at important nodes in the Plan Area, such as the intersection of the Central Subway and Caltrain and the intersection of 5th and Brannan. (2016 Plan pp. 97–100)

Accordingly, Draft EIR p. IV.B-34 states that, "Taller buildings in specific clusters would reinforce the existing street grid-oriented development patterns and the locations of transit, but would concentrate visual changes at specific locations." The Plan would not substantially degrade the visual character or quality of the Plan Area, substantially damage scenic resources, adversely affect public views, or have a substantial adverse effect on scenic vistas, and the aesthetic impacts would be less than significant. In addition, pursuant to CEQA Section 21099, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria: the project is in a transit priority area; the project is on an infill site; the project is residential, mixed-use residential, or an employment center. Most, if not all, subsequent development projects under the proposed Plan would meet each of the above three criteria. Thus, project-level CEQA review for such projects would not consider effects on aesthetics or parking.

The commenter specifically contends that the 2016 Plan's allowing 350-foot-tall buildings on Second and Harrison streets is counter to the principle of permitting towers only near transit stations or other nodes and

therefore would result in a significant aesthetic impact. As stated on Draft EIR p. IV.D-39, the entire Plan Area meets the City's Proximity to Transit Stations screening criterion for vehicle miles traveled meaning that the entire Plan Area is within 0.5 mile of an existing rail stop or bus line with peak-period headway of 15 minutes or less. Specifically, with respect to the intersection of Second and Harrison streets, this location is within 850 feet (0.15 mile) of seven Muni bus lines (8, 8AX, 8BX, 10, 12, 25, 30, 45), 0.5 mile from the Montgomery Street BART/Muni Metro station, and also 0.5 mile from the future Moscone Center station of the under-construction Central Subway. Accordingly, tower development at this location would be "near transit stations." Moreover, development at this location would be part of a "consistent pattern of development adjacent to I-80 [that] would reduce the visual prominence of the elevated freeway viaduct," as stated on Draft EIR p. IV.B-34.

The Draft EIR's determination that development under the Plan would not degrade the visual character or quality of the Plan Area or substantially damage scenic resources, and that aesthetics impacts would be less than significant, is supported by substantial evidence in the record.

Comment AE-3: One Vassar Project

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

O-One Vassar.4

"**Page:** **Comment:**

"IV.B-38 This section states that the tallest new vertical elements (at parcels on Fourth Street at Townsend Street, Fourth Street at Brannan Street, and Harrison Street at Third Street) would partially obscure views of the Bay. Please ensure that the anticipated development of the Key Development Site #3 structures are incorporated within this discussion." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.4])*

Response AE-3

The comment asks whether the discussion on Draft EIR p. IV.B-38 accounts for potential buildings on the site identified as Site 3: "2nd and Harrison" in the Plan's Key Development Sites map (Figure 1 in Section E of Part II of the Plan, Central SoMa Plan, p. 171).

The text cited by the commenter discusses potential changes in the view from Corona Heights Park (Draft EIR Figures IV.B-15 and IV.B-16, pp. IV.B-22 and IV.B-23). The Draft EIR specifically notes the greatest change that would be apparent in this view—the tallest buildings permitted pursuant to the Plan would partially block views of San Francisco Bay. Among the sites of these buildings listed in the Draft EIR is "Harrison Street at Third Street," which references Key Development Sites 2 and 3 (the former "4th and Harrison" site), which are located on Harrison Street both east and west of Third Street. For clarification, the last sentence in the first partial

paragraph on Draft EIR p. IV.B-38 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> … The tallest new vertical elements (at parcels on Fourth Street at Townsend Street, Fourth Street at Brannan Street, and Harrison Street between Second and Fourth Streets ~~at Third Street~~) would partially obscure views of the Bay from Corona Heights Park, but not to a large extent.

This clarification does not alter the conclusion that "the tallest new vertical elements would partially obscure views of the Bay from Corona Heights Park, but not to a large extent" (Draft EIR p. IV.B-38). This clarification also does not change the conclusion that effects to scenic resources would be less than significant with implementation of the proposed Plan. As noted above, pursuant to CEQA Section 21099 of Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the 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;
3. The project is residential, mixed-use residential, or an employment center.

Most, if not all, subsequent development projects under the proposed Plan would meet each of the above three criteria. Thus, project-level CEQA review for such projects would not consider effects on aesthetics or parking. As such, no further changes are required to the Draft EIR.

D.6 Cultural and Paleontological Resources

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

- Comment CP-1: Historic Resources That Could Be Affected by the Plan
- Comment CP-2: Intangible Cultural Heritage Assets
- Comment CP-3: Mitigation Measures
- Comment CP-4: Object to Identification of 645 Harrison Street as a Potential Article 10 Landmark
- Comment CP-5: SoMa Pilipinas Cultural Heritage District

Comment CP-1: Historic Resources That Could Be Affected by the Plan

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

O-One Vassar.6

"**Page:** **Comment:**
IV.C-55 The first full paragraph on this page lists properties containing historic resources that may be affected by anticipated Plan area development. This list should include the existing structures at 400 Second Street and 665 Harrison." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.6])*

Response CP-1

The comment accurately states that two properties containing historic resources that may be affected by anticipated Plan Area development should be added to the list of properties identifying such properties. Sixteen additional historic resources that may be affected by anticipated Plan Area development were also identified. All of these properties are shown as historic resources on Figure IV.C-2, Historical Resources in the Plan Area and Vicinity, p. IV.C-16, and were identified as historic resources in the Central SoMa Historic Resources Survey. As such, the first full sentence on Draft EIR p. IV.C-55 is revised as follows (deleted text is shown in ~~strike-through~~; new text is double-underlined):

> … Listed, designated, and eligible individual historic architectural resources that could be affected by an allowable increase in permitted building height from 85 feet or less to 130 to 160 feet include the following properties: 36 Bluxome Street, 53 Bluxome Street, 350 Townsend Street, 525 Fourth Street, 401 Fourth Street, 428 Third Street, 665 Harrison Street, 177 Stillman Street, 120 Perry Street, 735 Harrison Street, 868 Folsom Street, 854 Folsom Street, 848 Folsom Street, 844 Folsom Street, and 539 Bryant Street. Listed, designated, and eligible individual historic architectural resources that could be affected by an allowable increase in permitted building height from 85 feet or less to over 160 feet include the following properties: 530 ~~5th~~ Fifth Street, 400 ~~2nd~~ Second Street, 401 Fourth Street (765 Harrison Street), 601 Brannan Street, 650 Fifth Street, 665 Harrison Street, 690 Fifth Street, 645 Harrison Street, 620 Fourth

Street, 310 Townsend Street, 410 Townsend Street, 424 Townsend Street, and 645 Harrison Street, as well as all of the buildings associated with the California Register-eligible San Francisco Flower Mart District (see Figure IV.C-2, Historical Resources in the Plan Area and Vicinity, and Table APX-C-1 in Appendix C). …

Comment CP-2: Intangible Cultural Heritage Assets

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

O-VEC.5

"VEC [Veteran's Equity Center] also has concerns regarding impact standards and mitigation measures relating to historical resources and cultural heritage assets. While we recognize that 'intangible cultural heritage assets' are not necessarily regulated as historical resources under CEQA (IV.C-48) and that 'projects that comply with the [Secretary of the Interior's Standards for the Treatment of Historic Properties] can be exempted from CEQA review' (IV.C-49), we urge the Planning Department to regulate future projects within the Plan Area so that they comply with the vision of SoMa Pilipinas and support existing assets within the cultural district (as mentioned previously). In terms of the mitigation measures that were outlined in the Draft EIR towards reducing the impact towards historical resources such as documentation or oral histories, we request that there be a deeper conversation about how future projects could also work with SoMa Pilipinas groups and residents to limit 'significant and unavoidable' (IV.C-60) changes to historical resources and the cultural heritage of the district." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.5])*

Response CP-2

The comment requests that future development projects in the Plan Area be regulated to comply with the vision of SoMa Pilipinas, and that further discussion occur with regard to how future development projects work with SoMa Pilipinas groups. The comment also requests that Draft EIR Mitigation Measure M-CP-1c, Oral Histories, be amended to include collaboration with SoMa Pilipinas when documenting the oral history of a historic resource. The comment accurately acknowledges that cultural heritage assets are not considered historical resources under CEQA or state or local landmarking law. See Response OC-1 on p. RTC-248 for further discussion of the SoMa Pilipinas – Filipino Cultural Heritage District. As such, because the comment does not address the adequacy or accuracy of the Draft EIR, as it pertains to cultural resources defined under CEQA, no further mitigation measures are necessary to reduce physical impacts on CEQA cultural resources, and no further response is necessary. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment CP-3: Mitigation Measures

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

O-CSPO.1
O-CSPO.2
O-CSPO.3

"**Page:** **Comment:**

S-9 Mitigation Measure M-CP-1 c. This measure would require oral histories for sites where historic resources are demolished. The mitigation measure does not identify a deadline for completing an oral history. Since the mitigation measure does not require the building to be extant, this mitigation measure should clarify that oral histories are not prerequisites to the issuance of building or demolition permits." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.1])*

"**Page:** **Comment:**

S-10 Mitigation Measure M-CP-le. This measure would require video documentation prior to the demolition of a historic resource, where planning staff determine such a measure would be effective and feasible. The measure states that the documentation 'shall include as much information as possible … about the materials, construction methods, current condition, historic use, and historic context of the historical resource' and must be completed prior to the issuance of a demolition or site permit for the project. This measure is novel and has not been included in other area plan EIRs. The requirement to provide 'as much information as possible' does not provide a meaningful standard for sponsors regarding the content, format, or duration of video documentation, nor does it provide guidance to Planning Department staff for approving the videos. Together with the requirement to complete this mitigation prior to issuance of a site permit, the lack of clear standards regarding the content and approval standards of video documentation could substantially delay projects. This mitigation measure should be eliminated from the EIR." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.2])*

"**Page:** **Comment:**

S-12 Mitigation Measure M-CP-3a. This measure would require projects utilizing heavy equipment during construction to undertake a monitoring program of nearby historic resources, including requirements to conduct pre-construction surveys and ongoing vibration monitoring of the resources during construction. Certain monitoring measures may require authorization from the owners of the potentially-affected historic properties for developers to access and monitor their properties. The measure should therefore be made contingent on their provision of such access by clarifying that the mitigation measure may be satisfied by (a) exterior surveys from public vantages or private property accessible to the developer satisfy this mitigation measure, and (b) alternative methods of vibration monitoring in areas under the control of the developer. The Department should consider the limiting monitoring requirements to directly adjacent historic resources." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.3])*

Response CP-3

The commenter requests the following:

- Revise Mitigation Measure M-CP-1c, Oral Histories, to clarify that oral histories are not prerequisites to the issuance of building or demolition permits;
- Remove Mitigation Measure M-CP-le, Video Recordation, from the Draft EIR because it does not provide a standard for sponsors regarding content, format, and duration, nor does it provide guidance to Planning Department staff for approving the videos; and
- Make Mitigation Measure M-CP-3a, Protect Historical Resources from Adjacent Construction Activities, contingent on developers being able to access potentially affected historic properties, and include alternative measures to satisfy the mitigation measure, such as conducting exterior surveys from public rights-of-way or alternative methods of vibration monitoring in areas under the control of the developer.

Mitigation Measure M-CP-1c: Oral Histories

The MMRP identifies the mitigation and monitoring schedule for Mitigation Measure M-CP-1c, Oral Histories, which states that the mitigation measure would need to be satisfied prior to demolition or adverse alteration of the resource. The MMRP will be reviewed by the Planning Commission as part of its review of the Plan.

Mitigation Measure M-CP-1e: Video Recordation

Mitigation Measure M-CP-le, Video Recordation, states that the documentation shall be conducted by a professional videographer, and narrated 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 Code of Federal Regulations, Part 61). The content, format, and length of the video would be based on the character and history of the building proposed to be demolished and may be different for each building, and should be coordinated with Planning Department preservation staff, as noted in the mitigation measure. The MMRP also identifies the mitigation and monitoring schedule for the mitigation measure, which states that the mitigation measure would need to be conducted prior to the start of any demolition or adverse alteration of a designated historic resource and would be considered complete upon submittal of completed video documentation to the San Francisco Public Library or other interested historical institution. Regarding the statement that this mitigation measure should be removed because it does not provide clear guidance regarding the content and approval standards of video documentation, note that the mitigation measure states that the project sponsor shall work with preservation staff prior to undertaking video recordation, as every resource is different and no comprehensive set of content and approval standards could be developed that would cover every project. Furthermore, CEQA requires identification of feasible mitigation measures that could substantially lessen significant effects, and the commenter has not provided evidence that the mitigation measure is infeasible. The MMRP will be reviewed by the Planning Commission as part of their review of the Plan. However, in response to the commenter's concern that "as much information as possible" does not provide a meaningful standard, Draft EIR Mitigation Measure M-CP-1e, Video Recordation, p. IV.C-59, is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> **M-CP-1e: Video Recordation.** For projects that would demolish a historical resource or contributor to a historic district for which Preservation Planning staff determined that such a measure would be effective and feasible, the project sponsor shall work with Department Preservation staff or other

qualified professional, to undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated 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 Code of Federal Regulations, Part 61). The documentation shall ~~include as much information as possible using~~ use visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource.

Archival copies of the video documentation shall be submitted to the Planning Department, and to repositories including but not limited to~~:~~ the San Francisco Public Library, Northwest Information Center, and ~~the~~ California Historical Society. This mitigation measure would supplement the traditional HABS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research.

Mitigation Measure M-CP-3a: Protect Resources from Adjacent Construction Activities

Mitigation Measure M-CP-3a, Protect Historical Resources from Adjacent Construction Activities, requires project sponsors to incorporate into construction specifications for a proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to historic buildings. As such, this mitigation measure does not address construction monitoring, and we assume the commenter is actually referring to Mitigation Measure M-CP-3b, Construction Monitoring Program for Historical Resources, in her comment. The monitoring program is intended to capture potential impacts to historic resources in the event of pile driving or other vibration generating construction activities, as further explained on p. IV.C-61 of the Draft EIR. To address the commenter's concerns regarding a project sponsor's ability to access private property and to clarify the extent of the mitigation measure, EIR Mitigation Measure M-CP-3b, p. IV.C-62, is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

M-CP-3b: Construction Monitoring Program for Historical Resources. For those historical resources identified in Mitigation Measure M-CP-3a, and where heavy equipment would be used on a subsequent development project, the project sponsor of such a project shall undertake a monitoring program to minimize damage to ~~adjacent~~ historic buildings and to ensure that any such damage is documented and repaired. The monitoring program, which shall apply within 100 feet where pile driving would be used and within 25 feet otherwise, shall include the following components, subject to access being granted by the owner(s) of adjacent properties, where applicable. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a pre-construction survey of historical resource(s) identified by the San Francisco Planning Department within 125 feet of planned construction to document and photograph the buildings' existing conditions. Based on the construction and condition of the resource(s), the consultant shall also establish a standard maximum vibration level that shall not be exceeded at each building, based on existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 inch per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard, the project sponsor shall monitor vibration levels at each structure and shall prohibit vibratory construction activities that generate vibration levels in excess of the standard. Should owner permission not be granted, the project sponsor shall employ alternative methods of vibration monitoring in areas under the control of the project sponsor.

Should vibration levels be observed in excess of the standard, construction shall be halted and alternative construction techniques put in practice, to the extent feasible. (For example, pre-drilled piles could be substituted for driven piles, if feasible based on soils conditions; smaller, lighter equipment might be able to be used in some cases.) The consultant shall conduct regular periodic inspections of each building during ground-disturbing activity on the project site. Should damage to either building occur, the building(s) shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity on the site.

Comment CP-4: Object to Identification of 645 Harrison Street as a Potential Article 10 Landmark

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

O-One Vassar.5

"**Page:** **Comment:**

IV.C-28 Table IV.C-4. This section identifies 645 Harrison Street as a potential Article 10 Landmark. While the Project Sponsor acknowledges that the building is a historic resource under the California Environmental Quality Act, we do not believe the record includes sufficient facts or analysis to conclude that the building's architecture or cultural importance rises to the level of being considered a landmark building under Planning Code Article 10." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.5])*

Response CP-4

The commenter objects to the property at 645 Harrison Street being identified as a potential Article 10 Landmark. The comment does not address the adequacy or accuracy of the Draft EIR. The building at 645 Harrison Street is proposed for historic landmark designation as part of approval of the Central SoMa Plan. As of August 2017, a landmark designation report was under preparation by Planning Department historic preservation staff.[36] No decision regarding a potential landmark designation would be made until the report is final and available for public review. The comment objecting to landmark designation proposed in the Plan will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

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[36] Desiree Smith, San Francisco Planning Department, Memo to the Historic Preservation Commission for meeting of August 2, 2017: "Landmark Designation Work Program Quarterly Report," *http://commissions.sfplanning.org/hpcpackets/Landmark%20Designation%20Work%20Program%2008-02-17%20final.pdf*, accessed March 9, 2018.

Comment CP-5: SoMa Pilipinas Cultural Heritage District

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

O-FADF.2
O-SOMCAN-Rogge.2
O-VEC.4

"Lastly, we would also request that you look into how our cultural district can be incorporated and reflected in the new developments, as a result of the rezoning. All of Central SOMA is actually in the Filipino Cultural Heritage District and we would like to work with your commission to help ensure that design guidelines are developed to integrate the cultural district in future developments in the area." *(Bernadette Sy, Filipino-American Development Foundation, Letter, February 13, 2017 [O-FADF.2])*

"Lastly, we ask you to look into how our cultural district can be incorporated and reflected in all the new development that is to come from rezoning. All of Central SoMa is actually in the Filipino Cultural Heritage District, and so we would like to work with your Commission to help ensure that design guidelines are developed to integrate the cultural district in future development in the area. Thank you." *(Andrew Rogge, South of Market Community Action Network (SOMCAN), Hearing Transcript, January 26, 2017 [O-SOMCAN-Rogge.2])*

"VEC is a member of SoMa Pilipinas: San Francisco's Filipino Cultural Heritage District. With our participation in the creation of the cultural heritage district, we have advocated for the preservation of community cultural assets such as services targeted for immigrants, seniors, and families. While all these assets are not necessarily considered 'historical resources,' we appreciate the Plan's recognition of the Gran Oriente as a historic resource with potential future landmark status (IV-C-28). We also seek the recognition of the following community assets located within the Plan Area: 6th Street Lodginghouse Historic District, Filipino Education Center (824 Harrison), Philippine Heroes Square (Lapu Lapu Street, Bonifacio Street, Mabini Street, Tandang Sora Street, Rizal Street), San Lorenzo Ruiz Center (50 Rizal Street), and Bindlestiff Studio (185 6th Street). Having these properties designated as historic resources could potentially prevent 'substantial adverse change' (IV.C-50) of these spaces which are frequented and cherished by many members of the Filipino American community in San Francisco and the larger Bay Area." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.4])*

Response CP-5

The comments request that other buildings, as well as open spaces, including the Sixth Street Lodginghouse Historic District, Filipino Education Center (824 Harrison), Philippine Heroes Square (Lapu Lapu Street, Bonifacio Street, Mabini Street, Tandang Sora Street, Rizal Street), San Lorenzo Ruiz Center (50 Rizal Street), and Bindlestiff Studio (185 Sixth Street), be considered for designation as historical resources. The comments also request that the Planning Commission work with community groups to develop design guidelines to guide future development in the Plan Area to ensure it is sensitive to the Filipino Cultural Heritage District.

The Sixth Street Lodginghouse Historic District is identified in the Draft EIR as a historical resource for the purposes of CEQA. The district was identified in 2009 as eligible for the National Register as part of the South of Market Historic Resource Survey. As part of the South of Market Historic Resource Survey, the Filipino Education Center (824 Harrison), Philippine Heroes Square (Lapu Lapu Street, Bonifacio Street, Mabini Street, Tandang Sora Street, Rizal Street), San Lorenzo Ruiz Center (50 Rizal Street), and the Bindlestiff Studio (185 Sixth Street) were found ineligible for listing on the National and California Registers, as well as for local designation, because the buildings do not meet the minimum age requirements to be assessed for eligibility.[37] As such, these buildings are not considered historical resources for the purposes of CEQA.

Concerning the cultural heritage aspects of the South of Market neighborhood with respect to the City's Filipino community, Draft EIR pp. IV.C-12 and IV.C-13 note that the Planning Department in 2013 published the *San Francisco Filipino Heritage – Addendum to the South of Market Historic Context Statement*, which describes the history of the local Filipino community and numerous Filipino community cultural assets.[38] As explained in the Draft EIR, cultural heritage assets are not considered historical resources under CEQA. Rather, only tangible cultural heritage *properties* (e.g., buildings) can be eligible for listing on local, state, and federal registries of historic properties and thus deemed a historical resource under CEQA, while intangible cultural heritage *assets* cannot. Nevertheless, in April 2016, the Board of Supervisors recognized the importance of the Filipino cultural heritage in SoMa by establishment of the SoMa Pilipinas—Filipino Cultural Heritage District. This district covers a large part of the South of Market neighborhood, bounded by Market, Second, Brannan, and 11th streets. The Board also provided direction to develop "a strategic and implementation plan to set policies that promote community development and stabilization, and increase the presence and visibility of the district."[39]

The comments requesting that buildings and open spaces be considered for designation as historical resources and that the Planning Commission work with community groups to develop design guidelines to guide future development in the Plan Area are noted, but they do not address the adequacy or accuracy of the Draft EIR. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. See Response OC-1 on p. RTC-248 for further discussion of the SoMa Pilipinas – Filipino Cultural Heritage District.

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[37] South of Market Historic Resource Survey Map, *http://sf-planning.org/south-market-historic-resource-survey-map*, accessed November 4, 2017.

[38] Page & Turnbull, *San Francisco Filipino Heritage – Addendum to the South of Market Historic Context Statement,* prepared for San Francisco Planning Department, 2013.

[39] Board of Supervisors Resolution No. 119-16, adopted April 12, 2016; approved by the Mayor April 22, 2016.

D.7 Transportation and Circulation

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

- Comment TR-1: Transportation Setting
- Comment TR-2: Methodology
- Comment TR-3: Vehicle Miles Traveled (VMT) Impacts
- Comment TR-4: Circulation Impacts on 300 Third Street
- Comment TR-5: Traffic Level of Service Analysis
- Comment TR-6: Transportation Impact Figures
- Comment TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles
- Comment TR-8: Transit Impacts
- Comment TR-9: Pedestrian and Bicycle Impacts
- Comment TR-10: Loading Impacts
- Comment TR-11: Parking Impacts
- Comment TR-12: Emergency Vehicle Access Impacts
- Comment TR-13: Mitigation and Improvement Measures
- Comment TR-14: Miscellaneous Transportation Comments

Comment TR-1: Transportation Setting

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

A-SFMTA.4

"Page IV.D-12 (Figure IV.D-4). Check the locations of 'closed crosswalks.' The map shows a closed crosswalk across the south side of Fourth St. at Harrison, however a closed crosswalk is located across the on-ramp at Fourth/Harrison. In addition, there are no closed crosswalks at Fourth Street/ Bryant." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.4])*

Response TR-1

The comment requests that the locations of closed sidewalks be checked for accuracy in Draft EIR Figure IV.D-4, Missing Curb Ramps, Closed Crosswalks, and Multiple Turning Lanes, p. IV.D-12. Figure IV.D-4 has been updated to shift the closed crosswalk at the intersection of Fourth/Harrison to the on-ramp and to remove the closed crosswalk and dual left-turn symbols at the intersection of Fourth and Bryant streets. Additionally,

Figure IV.D-4 has been updated to remove the closed crosswalk symbols at the intersection of Fremont and Harrison streets. The revised figure is presented on the following page. Since publication of the Draft EIR, the City also installed crosswalks at the intersection of Bryant and Sterling streets (the I-80/Bay Bridge on-ramp). These changes do not affect the analysis or findings of significance in the Draft EIR, as such no revisions to the Draft EIR are required.

Comment TR-2: Methodology

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

O-CSN-1.66
O-UNITE Here.5
I-Hestor-2.2

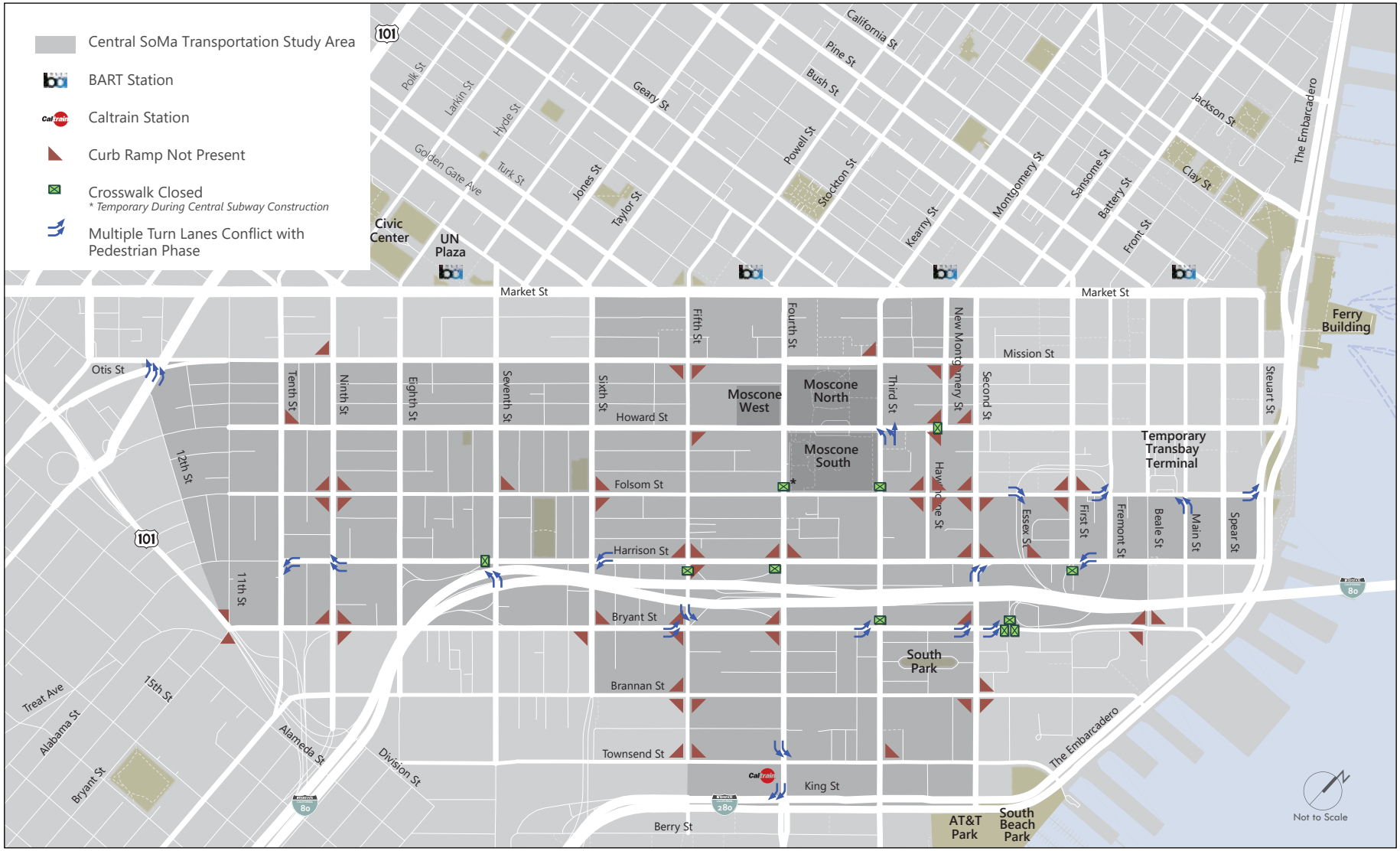
"This concludes my current comments on the Central SoMa Plan Project DEIR. For the reasons stated above [comments related to VMT, traffic, transit, traffic hazards, emergency vehicle access, and cumulative analysis], the traffic analysis is inadequate and revised transportation analyses should be performed. Results should be recirculated in draft status for a full 45 day review period." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.66])*

"There was no analysis in the DEIR of trip generation or any other impacts that was done for hotels. But it should be redone, assuming that a certain amount of these housing units will end up as illegal short-term rentals." *(Cynthia Gómez, UNITE Here, Local 2, Hearing Transcript, January 26, 2017 [O-UNITE Here.5])*

"There are massive changes in the traffic patterns since the Eastern Neighborhood Plan was adopted. Reverse-commuting buses from Silicon Valley are dumping the housing demand from Silicon Valley on this area and on the Mission and on the neighborhoods of the city, including Noe Valley. *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.2])*

Response TR-2

One comment states that the summary conclusion that the traffic analysis presented in the Draft EIR is inadequate based on preceding comments related to VMT, traffic, transit, traffic hazards, emergency vehicle access, and cumulative analysis. The commenter opines that a revised transportation analysis should be conducted, the results incorporated into the Draft EIR, and the revised Draft EIR recirculated for an additional 45-day review period. A comment asserts that trip generation and analysis for hotels was not conducted, and that some residential units would be used as illegal short-term rentals. In addition, a comment states that there have been changes in traffic patterns since the Eastern Neighborhoods Plan was adopted, and that there is substantial reverse commuting between the Silicon Valley, Central SoMa, and other San Francisco neighborhoods.



SOURCE: Fehr & Peers

Case No. 2011.1356E: Central SoMa Plan

Figure IV.D-4

Missing Curb Ramps, Closed Crosswalks, and Multiple Turning Lanes [Revised]

The transportation analysis is consistent with San Francisco's *Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines), issued by the Planning Department in 2002, and is consistent with the recent revisions to environmental review pursuant to SB 743 (as described on Draft EIR pp. IV.D-20 and IV.D-21), as well as the transportation significance criteria presented on Draft EIR pp. IV.D-24 and IV.D-25, which is consistent with CEQA Guidelines Appendix G.

The proposed rezoning included as part of the Central SoMa Plan is analyzed in the Draft EIR at a programmatic level, while analysis of the proposed street network changes is analyzed at a project level. The transportation impact analysis methodology is presented on Draft EIR pp. IV.D-25 through IV.D-32. The travel demand methodology and results are presented on Draft EIR pp. IV.D-33 through IV.D-35. As described in this section, the San Francisco Transportation Authority's (Transportation Authority's) San Francisco Chained Activity Modeling Process (SF-CHAMP) travel demand model was used to estimate travel demand. Hotel uses are included in the SF-CHAMP model, and travel demand is calculated based on the number of employees. The analysis is also consistent with EIRs prepared by the City for other area plans, including the EIRs prepared for the Eastern Neighborhoods, Transbay Center District Plan, and Western SoMa Community Plan. Also refer to Response TR-3 (p. RTC-139) regarding VMT, Response TR-5 (p. RTC-147) regarding traffic, Response TR-8 (p. RTC-160) regarding transit, Response TR-9 (p. RTC-167) regarding pedestrians, Response TR-11 (p. RTC-178) regarding parking, Response TR-12 (p. RTC-180) regarding emergency vehicle access, and Response TR-13 (p. RTC-184) regarding transit mitigation measures. In addition, refer to Response GC-13 (p. RTC-397) for further discussion of non-traditional housing/short-term rentals, and Response CU-3 (p. RTC-301) regarding cumulative analyses.

Assuming the commenter's suggestion that some residential units could be used for short-term rentals, and that the travel demand generated by short-term rentals is similar to tourist hotel use, the transportation impact analysis in the Draft EIR would tend to overestimate rather than underestimate the transportation impacts of the Plan. Pursuant to the trip generation rates specified in the SF Guidelines residential units generate 7.5 trips per day for one-bedroom units and 10.0 trips per day for two-bedroom (or more) units, whereas tourist hotel/motel rooms generate 7.0 trips per day. Moreover, tourist hotel/motel use generates fewer trips during the p.m. peak hour than residential (10 percent vs. 17.3 percent). Thus, the commenter's suggestion that some residential units developed under the Plan could be used for short-term rentals does not demonstrate that the Plan would result in new or substantially more-severe impacts on transportation than identified in the Draft EIR or that the Draft EIR must be recirculated.

The comment regarding changes in traffic patterns and effects of reverse commuting between Silicon Valley and San Francisco neighborhoods is noted. As described on Draft EIR p. IV.D-32, travel demand for the transportation study area was developed using the SF-CHAMP model, validated to represent the existing and future transportation network and land uses within San Francisco. The SF-CHAMP model is required to maintain consistency with regional forecasts of population, housing units, and employment, and therefore, it considers the effect of Silicon Valley employment and supply of housing. Thus, the changes in traffic patterns since the Eastern Neighborhoods Plan was adopted is reflected in the existing setting, and incorporated into the SF-CHAMP travel demand analysis.

Comment TR-3: Vehicle Miles Traveled (VMT) Impacts

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

O-CSN-1.14
O-CSN-1.59

"**A. The Plan will have Significant Adverse Traffic Impacts that are not Disclosed or Analyzed in the DEIR.**

"**1. The Plan will Increase Employee VMT, Resulting in a Significant Traffic Impact Under SB 743.**

"The Plan will place thousands of cars each day into an area that already has unacceptable levels of traffic congestion. At rush hour, traffic is at a standstill in the Plan area. The Plan will add over 63,000 new jobs and 25,000 new residents to the area – more than doubling the number of jobs and tripling the number of residents in the area. (DEIR, p. IV-6). While many of these workers and residents may take public transit, there can be no dispute that many will drive cars, thereby adding to already unacceptable levels of traffic. The DEIR glosses over this obvious fact and makes the preposterous conclusion that the Plan will have less than significant traffic impacts. This conclusion simply fails the straight-face test. Anyone who has spent any time on roadways in this area will recognize that tripling the population of the area will have significant traffic impacts.

"The DEIR relies on the recently passed SB 743 (Pub.Res.Code § 21099(b)(1)) for its counterfactual conclusion of not traffic impacts. However, even under the vehicle miles travelled (VMT) approach set forth in SB 743, the Plan will have significant traffic impacts. The SB743 regulations, 14 Cal.Code Regs. §15064.3, specify that a land use plan may have a significant impact on transportation if it is not consistent with the relevant sustainable community strategy (SCS). To be consistent with the SCS, the development must lead to VMT equal to or less than the VMT per capita ***and*** VMT per employee specified in the SCS. Plan Bay Area is the SCS (DEIR, p. VI.D-36), and it sets VMT target per capita at 10% below the 2005 Bay Area average. However, it does not set any target for employee VMT. (DEIR, p. IV.D-21, IV.D-36) Therefore, the city cannot claim that the development meets employee VMT targets in the SCS -- there are none. Even worse, the DEIR concludes that the plan will ***increase*** employment VMT from 8.2 to 8.7 in 2012 and from 6.8 to 7.1 in 2040. (DEIR p. IV.D-38). 'With Plan implementation, VMT per capita would … increase slightly in the office category.' (DEIR, p. IV.D-38). This should be no surprise since the Plan creates 63,000 new jobs, but only 25,000 new residents, so about 40,000 of the new employees will have to commute long distances. Since the plan will ***increase*** employee VMT, it has a significant traffic impacts even under the new VMT methodology set forth in SB 743. As a result, the City' conclusion that the Plan has less than significant traffic impacts is arbitrary and capricious and the City has failed to proceed in a manner required by law. The City must acknowledge a significant traffic impact in a revised DEIR, analyze the traffic impact, and implement all feasible mitigation measures and alternative to reduce this impact and consider all feasible alternatives.

"Also, as discussed by Traffic Engineer Daniel T. Smith, PE, the Plan will drastically increase VMT in the Plan area. Mr. Smith explains:

> DEIR Table IV-1 indicates that in the baseline (2010) condition, the Central SoMa population was 12,000, that in 2040 without the Project it would be 28,200, and in 2040 with the Project it would be 37,500. The same table also indicates that in the baseline year employment in Central SoMa was 45,600, that in 2040

without the Project it would be 72,800 and that in 2040 with the Project employment would be 109,200 jobs. At the VMT per capita rates disclosed in DEIR Table IV.D-6, the following would be total VMT generated in Central SoMa:

	Baseline	2040 No Project	2040 With Project
Population	25,200	50,760	60,000
Employment	373,920	495,040	775,320
Total	399,120	545,800	935,320

As can be seen from the above compilations, the 2030 No Project scenario generates almost 37 percent more net VMT than the Baseline; **the 2040 With Project scenario generates over 134 percent more net VMT than the Baseline and over 71 percent more than the 2040 No Project Scenario**. Since the public knows from information presented in this DEIR and from other recent DEIR's for projects having transportation effects on the Central SoMa area that there are already problems impacting motor vehicle traffic, bicyclists, pedestrians, the safety of all of the aforementioned, and transit operations. In that situation adding development to the area that generates 134 percent more than existing uses and 71 percent more than development to 2040 under existing plans and zoning is significantly impactful on transportation

"(Smith Comment, p. 2). Since the Plan will increase VMT, the City must conclude that it will have significant impacts even under SB 743." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.14])*

"**The Project May Not Be Eligible To Analyze Traffic Impacts Solely Under the VMT per Capita Metric**

"The DEIR has attempted to evaluate Project traffic impacts solely under the Vehicle Miles Traveled (VMT) per Capita metric provision of SB 743, eschewing the conventional delay/Level of Service (LOS) analysis. The SB 743 regulations embodied in CEQA § 15064.3 specify that a land use plan may have a significant impact on transportation if it is not consistent with the relevant sustainable community strategy (SCS). To be consistent with the SCS, the development must lead to VMT equal to or less than the VMT per capita and VMT per employee specified in the SCS. *Plan Bay Area* is the relevant SCS (per DEIR page IV.D-36), and it sets the VMT per capita target at 10 percent below the 2005 Bay Area average. However, it does not set any target for VMT per employee (DEIR pages IV.D-21 and IV.D-36). Therefore, the City cannot claim that the development meets VMT targets per employee since there are none. Worse yet, the DEIR concludes that the Project will increase VMT per employee in the Project area from 8.2 to 8.7 in 2012 and from 6.8 to 7.1 in 2040 (DEIR page IV.D-38) stating, '*With Plan implementation, VMT per capita would…increase slightly in the office category*'. Since the Project will increase VMT per employee in the study area, it does not comply with the terms of SB 743.

"**VMT Per Capita Generated in the Project Area Is an Incomplete Metric for Measuring Traffic Impacts in the Subject Plan Area**

"The VMT (vehicle miles traveled) per Capita (referring hereinafter to both VMT per unit population and VMT per employee as a single phrase while still recognizing that each has a separate rate) metric is a useful indicator when planning for a broad area or region, such as where generally identifying areas where development should be encouraged or discouraged, particularly when concentrating on considerations such as Air Quality pollutant and Greenhouse Gas emissions since these have a rather direct correlation to VMT. However, when planning for a discrete area, VMT per Capita as the sole traffic metric gives absolutely no indication when a plan has

packed so much development into an area as to make the streets unlivable for bicyclists, pedestrians, motorists and their passengers and transit patrons alike - the VMT per Capita values will just stay the same or perhaps even improve (become lower) somewhat. To draw any some inference about how much development is sustainable based on VMT, Total VMT generated by the plan and total VMT experienced within the subject area must be considered.

"DEIR Table IV-1 indicates that in the baseline (2010) condition, the Central SoMa population was 12,000, that in 2040 without the Project it would be 28,200, and in 2040 with the Project it would be 37,500. The same table also indicates that in the baseline year employment in Central SoMa was 45,600, that in 2040 without the Project it would be 72,800 and that in 2040 with the Project employment would be 109,200 jobs. At the VMT per capita rates disclosed in DEIR Table IV.D-6, the population and employment totals disclosed in DEIR Table 1V-1 would generate the following VMT totals in Central SoMa:

VMT Gen By	Baseline	2040 No Project	2040 With Project
Population	25,200	50,760	60,000
Employment	373,920	495,040	775,320
Total	399,120	545,800	835,320

"As can be seen from the above compilations, the 2040 No Project scenario generates almost 37 percent more net VMT than the Baseline; the 2040 With Project scenario generates over 109 percent more net VMT than the Baseline and over 53 percent more than the 2040 No Project Scenario. Since the public knows from information presented in this DEIR and from other recent DEIR's for projects having transportation effects on the Central SoMa area that there are already problems impacting motor vehicle traffic, bicyclists, pedestrians, the safety of all of the aforementioned, and transit operations. In that situation adding development to the area that generates 109 percent more VMT than existing uses and 53 percent more VMT than development to 2040 under existing plans and zoning is significantly impactful on transportation.

"But even this is just the tip of the iceberg. As noted in the DEIR, the streets of the Central SoMa serve as a gateway between elements of the regional highway system and greater downtown San Francisco, Mission Bay, and the greater SoMa and nearby areas as well as thoroughfares for movements between these areas. To make judgments about the functionality of and livability around the streets of the Central SoMa, that burden of VMT must be quantified and assessed. The DEIR has considered neither the total VMT that would be generated in Central SoMa nor the other VMT that traverses it and therefore is inadequate." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.59])*

Response TR-3

The commenter opines that the analysis must consider the increase in total VMT under the Plan in addition to VMT per capita as the metric for analyzing impacts. The commenter also states that the slight increase in VMT per employee under the Plan identified in the Draft EIR demonstrates that the Plan would have a significant VMT impact. The commenter is mistaken on both counts.

As indicated on Draft EIR p. IV.D-21, California Senate Bill (SB) 743 requires the California Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts that shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. The statute calls for OPR, in developing the criteria, to recommend potential metrics

including VMT. VMT is a measure of the amount and distance that a project causes potential residents, tenants, employees, and visitors to drive, including the number of passengers within a vehicle. The San Francisco Planning Commission replaced automobile delay (vehicular level of service, or level of service [LOS]) with VMT criteria via Resolution 19579, which was adopted at the Planning Commission hearing on March 3, 2016.

The methodology for the VMT impact analysis is presented on Draft EIR pp. IV.D-25 through IV.D-29, and Impact TR-1 on Draft EIR pp. IV.D-35 through IV.D-40 presents the results of the analysis. As noted on Draft EIR p. IV.D-36, the impact assessment of the Plan's rezoning proposal to provide for increased development potential requires demonstrating consistency with the region's sustainability community strategy (SCS). The MTC's 2013 Regional Transportation Plan, *Plan Bay Area*, adopted in July 2013, is the region's SCS.[40]

According to the impact assessment methodology recommended by OPR and adopted by the Planning Commission, a land use plan may have a significant impact on transportation if it is not consistent with the relevant SCS. For this purpose, consistency with the SCS means the following must be true:

- Development specified in the land use plan is also specified in the SCS (e.g., the plan does not specify developing in outlying areas specified as open space or Priority Conservation Area in the SCS); and
- Taken as a whole, development specified in the plan leads to a VMT that is equal to or less than the VMT per capita specified in the SCS.

Regarding the first criterion, development specified in the Central SoMa Plan is also specified in the SCS and does not include development in outlying areas specified as open space or Priority Conservation Area in the SCS. Therefore, the Plan meets the criterion related to land use. Furthermore, Central SoMa is located within a Priority Development Area as designated in *Plan Bay Area*. Priority Development Areas are areas designated for increased development due to their proximity to transit, job centers, shopping districts, and other services.

Regarding the second criterion, *Plan Bay Area* sets a VMT per capita reduction target of 10 percent below the Bay Area 2005 regional average VMT levels by 2040 for residential development. The Plan does not set a VMT per employee target. As stated in the Draft EIR (p. IV.D-36), the Plan would need to only meet the residential per capita VMT for consistency with the SCS. (The programmatic analysis of the Plan indicated that for residential uses, the reduction in daily VMT per capita for the Central SoMa Plan Area between 2005 and 2040 would be from 2.8 to 2.0, a 30.7 percent decrease with implementation of the Central SoMa Plan; this is greater than the target 10 percent reduction below 2005 levels in *Plan Bay Area*. The Draft EIR also notes that, while not used for determining consistency with the *Plan Bay Area*, the average daily VMT per employee in the Central SoMa analysis area is also projected to decrease between 2005 and 2040 conditions from 10.4 to 7.6. Thus, the Central SoMa Plan Area is expected to attain the *Plan Bay Area* goal of reducing VMT per capita by 10 percent compared to 2005 levels, and the Plan-VMT impact would be less than significant.

Additional VMT analysis, such as calculation of total VMT for the area as suggested in the comment, is not required to assess VMT impacts.[41] The Planning Department methodology, using VMT per capita rather than

[40] On July 26, 2017, the MTC Commission and the ABAG Executive Board adopted the updated *Plan Bay Area* (i.e., *Plan Bay Area 2040*), including the updated 2017 SCS. The 2013 SCS was the applicable SCS at the time of the Central SoMa Draft EIR publication.

[41] Wade Wietgrefe, San Francisco Planning Department, "California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives," Memorandum to Planning Commission, February 23, 2017.

total VMT, is consistent with OPR's recommended methodology.[42] The calculations provided in the comments for total VMT for Baseline, No Project, and With Project conditions show that total VMT due to growth would increase, as expected, as the Plan would introduce new residents and employees into the area. Other than showing an increase in total VMT from 2012 to 2040 conditions (reflecting the increase in residents and employees in the area), the calculations of total VMT and the comments do not present a compelling argument that is consistent with the impact assessment methodology recommended by OPR and adopted by the Planning Commission. Further, they seem to suggest that the total increase in VMT would result in a significant impact and that the increase in VMT would all occur in the Plan Area, when neither is true. Not only would the Plan result in a decrease in per capita VMT, but also the effect of the VMT generated would be diffuse. As noted above, the VMT significance criterion is related to a reduction in VMT per capita, which is achieved with implementation of the Plan.

The basic policy objective of SB 743, as implemented in CEQA Section 21099, is to better align the way that transportation impacts are defined and measured under CEQA with the state's greenhouse gas reduction goals. Section 21099 accomplishes this by "establishing criteria for determining the significance of transportation impacts of projects within priority transit areas… [that] shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Recognizing that increasing population density in Priority Development Areas increases traffic congestion (i.e., *total* VMT) in these areas, Section 21099 expressly provides that "automobile delay, as described solely by level of service or similar measure of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment …" By stating that the Draft EIR should consider *total* VMT to evaluate transportation impacts, the commenter is essentially arguing for an automobile capacity metric (e.g., vehicular level of service), the former metric that the City has rejected in favor of per capita VMT—an efficiency metric—pursuant to Section 21099.[43]

The comment also states that the calculation of VMT per employee using the San Francisco Transportation Authority's SF-CHAMP model (presented on Draft EIR Table IV.D-6, Average Daily VMT per Capita, SF-CHAMP Model Data, Existing (2012) and 2040 Conditions, p. IV.D-38), which increases slightly between conditions without and with implementation of the Plan, would be reason to determine that the Plan would result in a significant impact related to VMT. As stated on Draft EIR p. IV.D-37, the assessment of the proposed Plan's VMT effects was also performed using the SF-CHAMP model. This assessment was used to determine if the VMT analysis using the SF-CHAMP model for 2012 and 2040 is in agreement with the MTC/ABAG VMT analysis for 2005 and 2040 that was used to determine consistency of the Plan with SCS. The analysis of VMT using the SF-CHAMP model was not used to determine consistency of the Plan with SCS. Further, as stated above, OPR's significance criteria is based on VMT per capita "taken as a whole." As demonstrated above and on the Draft EIR pages referenced above, VMT per capita and per employee would decrease between 2005 and 2040, the appropriate time period specified in the SCS.

As noted in the comment, the VMT analysis using the SF-CHAMP model indicated a minor increase in VMT per employee for the office land use (i.e., VMT per capita of 6.8 without the Plan, and 7.1 with the Plan for 2040

[42] March 3, 2016, Planning Commission Staff Report regarding Align, http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf.

[43] *Center for Biological Diversity v. California Department of Fish and Wildlife* (also known as "Newhall Ranch"), S217763, Nov. 30, 2015. In discussing projects that are designed to accommodate long-term growth in California's population activity, "a certain amount of greenhouse gas emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure."

cumulative conditions), while the average daily VMT per capita would decrease slightly in the residential and retail categories. These increases in the employment category are within the general margin of error inherent in efforts to model travel behavior into the future, and the plus Plan VMT per employee levels would remain substantially lower than the Bay Area regional average VMT per employee of 17.0. Given the relatively low average daily VMT per capita in the Plan Area, compared to other locations in the Bay Area, locating land use growth in Central SoMa would result in substantially less VMT per capita than if this growth were to be located in most other locations within the Bay Area or San Francisco. Also refer to Response PH-1, p. RTC-308, regarding location of housing and employment growth in San Francisco. For these reasons, no revisions to the Draft EIR are required.

Comment TR-4: Circulation Impacts on 300 Third Street

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

O-MPHA.1
O-MPHA.2

"I, as Board President of the Museum Pare HOA (233-unit residential condominium building), am concerned about the proposed street network changes discussed in Chapter 4D of the current Central SoMa Plan Draft Environmental Impact Report. Our building is at 300 Third Street at the corner of Third and Folsom streets and contains 233 residential units, ground-floor commercial space and three levels of parking for residents and the public. We are concerned that the proposed changes to the street network adjacent to our building will have a serious adverse effect on our residents, visitors and businesses.

"First, the DEIR recognizes that the significant reduction of traffic capacity on Folsom Street will result in increased congestion at both am and pm peak hours. This could significantly affect ingress and egress from our garage. Our garage has an entrance and exit onto Folsom Street and an entrance on Third Street which are already congested from traffic approaching the Bay Bridge during most pm peak hours. This makes entering or exiting the garage difficult and time-consuming which further adds to the congestion and as well as vehicle emissions. It appears from the DEIR that the proposed street network changes will make ·this much worse, and create am peak hour congestion as well, but there is no discussion of negative effects on local vehicle circulation as it affects existing residents and businesses. The two-way Folsom Street option is particularly concerning as traffic in the westbound direction could come to a complete stop as vehicles attempt a left-hand turn from Folsom Street into the garage entrance. Furthermore, pedestrian safety could be compromised." *(Jim Bourgart, Museum Parc Homeowners Association, Letter, February 10, 2017 [O-MPHA.1])*

"Second, our building relies daily on a myriad of service and delivery vehicles. We have only limited on-site loading space in the garage. The vast majority of service providers utilize the curbside parking spaces along both Third and Folsom streets adjacent to the building. The proposed elimination of parking on Third Street and the partial elimination of parking along Folsom Street, except for the south side at non-peak hours, will greatly restrict access to our building for these service providers that our building relies on to function properly on a daily basis. And it's certainly possible that we will rely on curbside loading even more in the future as

residents make more and more internet purchases that require physical delivery. Emergency vehicles that are called to the building also utilize curbside parking space that would be eliminated by the proposed street network changes. Again, while these potential impacts are identified in the DEIR there is no analysis of the effects on existing residential and commercial buildings.

"The DEIR identifies potential neighborhood-level impacts of the street network changes that could adversely affect our ability to access and operate the building in a safe and efficient manner but does not evaluate those effects not only on Museum Parc but on other similarly situated existing residential buildings. The Final EIR should be further refined to evaluate the adverse impacts of the street network changes on existing neighborhood residents and businesses." *(Jim Bourgart, Museum Parc Homeowners Association, Letter, February 10, 2017 [O-MPHA.2])*

Response TR-4

The comments raise concerns that the proposed street network changes on Third Street and on Folsom Street would have an adverse effect on the residents, visitors, and businesses at 300 Third Street, specifically limiting the access to the building's garage, limiting use of existing on-street parking and commercial loading spaces adjacent to the building, and constraining the ability of emergency vehicles to serve the building. The commenter also requests that the Final EIR be refined to evaluate the impacts of the street network changes on existing neighborhood residents and businesses.

The commenter requests that the analysis of the impact of the street network changes on vehicular access and circulation for existing buildings in the Plan Area, such as 300 Third Street, be included in the Final EIR. The proposed street network changes were designed consistent with San Francisco transportation plans and policies presented on Draft EIR pp. IV.D-22 and IV.D-23, including the Transit-First Policy, Vision Zero Policy, San Francisco Bicycle Plan, and Better Streets Plan, among others. For example, the street network changes include improving transit conditions in Central SoMa through the use of new transit-only lanes on numerous streets, including Folsom Street, enhancing bicycle circulation and safety through upgrades to existing bicycle facilities, and providing new protected facilities, as well as accommodating pedestrians and enhancing safety of all users consistent with the goals of Vision Zero and the Better Streets Plan.

The proposed street network changes were designed to a level of detail appropriate for CEQA analysis. They are meant to be flexible and responsive to the needs of the areas in which they are proposed. This means that details including vehicle, transit, bicycle lanes, and sidewalk widths, location of passenger and commercial loading, driveway curb cuts, and on-street parking regulations would be refined and confirmed at the time that detailed design documents for construction are prepared. As stated on Draft EIR p. IV.D-79, the proposed street network changes would undergo more detailed design and review prior to any construction. This would include preliminary review conducted by SFMTA's Transportation Advisory Staff Committee (TASC) and the San Francisco Fire Department, along with other City agencies, including the Police Department, Public Works, SFMTA, and SFPUC, among others.

While existing driveway access to buildings for vehicle parking and truck loading activities would be maintained, in some instances vehicular access may need to be revised. For example, as noted in the comments, implementation of the Howard/Folsom Two-Way Option may result in vehicles traveling westbound on Folsom

Street and turning into the 300 Third Street garage driveway on Folsom Street (located about 300 feet west of Third Street), which, although unlikely, could result in queues that extend into the intersection of Third /Folsom, illegally blocking the intersection. In this instance, San Francisco Municipal Transportation Agency (SFMTA) traffic engineers may restrict access to the building from westbound Folsom Street (e.g., through the use of two sets of double yellow lines consistent with the California Manual of Uniform Traffic Control Devices), and, as a result, access would only occur from eastbound Folsom Street, similar to existing conditions. Therefore, vehicular access to the building would be maintained. Emergency vehicles would not be affected by removal of on-street curb parking or loading spaces, as suggested in the comments, as emergency vehicles responding to incidents do not park at the curb but instead stop within the roadway right-of-way.

The analysis of implementation of the Plan in Impact TR-6 states that the failure to provide an adequate supply of off-street commercial loading spaces for new projects, and the removal of commercial loading spaces currently used by existing buildings in the area, would result in significant loading impacts. Therefore, the Draft EIR identified Mitigation MeasureM-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones, p. IV.D-74, to accommodate loading needs and to reduce the potential for conflicts between loading operations and transit, bicyclists, pedestrians, and other vehicles. Mitigation Measure M-TR-6b would require SFMTA to prepare detailed designs of the street network changes, taking into consideration the on-street loading supply needs for existing and new development as well as driveway access to loading facilities within existing and future buildings. This measure would reduce the potential for disruption of existing loading activities, including disruption of business operations. However, as stated on Draft EIR p. IV.D-71, it is unlikely that a sufficient amount of spaces could be provided to offset the net loss in supply because the potential locations for replacement of on-street commercial loading spaces where circulation changes are proposed are limited. For example, existing parking prohibitions or a lack of on-street parking spaces that could be converted to commercial loading spaces could inhibit the creation of new loading spaces, as could pedestrian circulation on adjacent sidewalks in some cases. Locations adjacent to transit-only lanes would also not be ideal for loading spaces because they may introduce new conflicts between trucks and transit vehicles. Therefore, even with implementation of this mitigation measure, loading impacts would remain significant and unavoidable with mitigation.

Concerning emergency vehicle access, the Draft EIR finds that, with mitigation, Plan impacts would be less than significant. As noted above, the Draft EIR explains that multiple City agencies, including the Fire Department, would be involved in review of the proposed street network changes prior to their implementation. Further, as explained on Draft EIR p. IV.D-80, "implementation of the Plan's proposed street network changes would not introduce unusual design features, nor would the Plan change the street network to hinder or preclude emergency vehicle access." Additionally, emergency vehicles would be able to travel in transit-only lanes. Finally, Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, as revised herein, would ensure that SFMTA, to the degree feasible, will design street network projects to include features that create potential opportunities for cars to clear travel lanes for emergency vehicles, including curbside loading zones, customized signal timing, or other approaches developed through ongoing consultation between SFMTA and the San Francisco Fire Department.

In summary, the proposed street network changes analyzed in the Draft EIR were designed to a level of detail appropriate for analysis in the EIR, and would be further developed to account for driveways and existing curb regulations and conditions related to emergency vehicle access, parking and commercial truck and passenger

loading. The Draft EIR analyzed and disclosed potential impacts related to implementation of the Plan (which includes the street network changes) and identified mitigation measures for significant impacts. Therefore, additional analysis of individual buildings within the Plan Area is not required and no revisions to the Draft EIR are necessary.

Also refer to Response LU-4, p. RTC-112, regarding discussion of impacts of the Central SoMa Plan on neighborhood character.

Comment TR-5: Traffic Level of Service Analysis

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

O-CSN-1.15
O-CSN-1.60

"**2. The Plan will have Highly Significant Traffic Impacts.**

"Traffic Engineer Daniel T. Smith, P.E. shows that the Plan will have highly significant traffic impacts and will create massive delays and traffic congestion in the plan area. Mr. Smith concludes (Smith Comment pp. 3–4):

- With the Project traffic and the Howard/Folsom one-way street configuration option, in the AM peak, intersections experiencing delay levels at LOS E or worse (55 seconds or more average delay per vehicle) would increase from 3 of the 36 studied under the existing condition to 21 of 36. In the PM peak, with the Project and the Howard/Folsom one-way street configuration, the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 39 of 80 with the Project traffic and subject street configuration.
- With the Howard/Folsom two-way street configuration option, in the AM peak, the number of intersections operating at LOS E or worse would increase from 3 of 36 in the existing condition to 17 of 36 with the plan and the subject street configuration. In the pm peak the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 37 of 80 with Project traffic and the two way street configuration.
- As to the freeway ramp analysis, 8 of the 11 ramps analyzed operate at vehicle densities of 35 passenger cars per mile per lane (volumes reflecting breakdown conditions) in the AM and/or PM peak in the existing condition. With the addition of Project related traffic and the proposed street network changes, 10 of the 11 ramps would operate at vehicle densities of 35 passenger cars per mile per lane in the AM and/or Pm peak hour." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.15])*

"**The DEIR Has Actually Performed a Traffic LOS Analysis. But It Conceals the Detailed Findings From the Public**

"Ironically, the DEIR did perform a typical traffic LOS analysis of intersections and freeway ramps in the SoMa study area. It did so to calculate differences in *transit delay* under the various plan land use development alternatives and the alternative street configuration scenarios considered in the DEIR. However, other than a

very generalized and non-location-specific summary of the LOS/delay study findings regarding what ordinarily would be considered traffic impacts that is presented at DEIR pages IV.D-41 through IV.D-43, it withholds from the public the location-specific measures of the severity of traffic impacts. We understand that elements of the San Francisco planning and political establishment (and others elsewhere) like eliminating traffic delay as a CEQA impact criteria because it eliminates the need to make findings of overriding significance about traffic impacts they have no intention of mitigating and avoids having to put up with the members of the public who actually care about traffic congestion and delay. However, CEQA requires that the Lead Agency make available all analyses that have been relied upon in the DEIR available for public review. It must do so with the details of the Highway Capacity Manual based LOS/delay analysis it performed to estimate transit delay.

"What the generalized summary of the DEIR's studies of traffic delay under *Highway Capacity Manual* procedures shows is that:

- Within the Central SoMa transportation study area, 36 intersections were evaluated for the AM peak hour and 80 intersections for the PM peak hour.
- Five freeway off ramps and six freeway on-ramps from/to I-80 and I-280 were evaluated.
- With the Project traffic and the Howard/Folsom one-way street configuration option, in the AM peak, intersections experiencing delay levels at LOS E or worse (55 seconds or more average delay per vehicle) would increase from 3 of the 36 studied under the existing condition to 21 of 36. In the PM peak, with the Project and the Howard/Folsom one-way street configuration, the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 39 of 80 with the Project traffic and subject street configuration
- With the Howard/Folsom two-way street configuration option, in the AM peak, the number of intersections operating at LOS E or worse would increase from 3 of 36 in the existing condition to 17 of 36 with the plan and the subject street configuration. In the pm peak the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 37 of 80 with Project traffic and the two way street configuration.
- As to the freeway ramp analysis, 8 of the 11 ramps analyzed operate at vehicle densities of 35 passenger cars per mile per lane (volumes reflecting breakdown conditions) in the AM and/or PM peak in the existing condition. With the addition of Project related traffic and the proposed street network changes, 10 of the 11 ramps would operate at vehicle densities of 35 passenger cars per mile per lane in the AM and/or Pm peak hour.

"The results of this analysis as generally summarized in the DEIR reflect a deterioration of operations on the study area street and freeway ramp system in the AM and PM peak hours that would ordinarily be considered significantly impactful. But the results as presented do not distinguish how much of the deterioration is due to traffic generated by the Project land uses, that due to the street configuration changes, and that due to land use and traffic growth in nearby areas." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.60])*

Response TR-5

The comments state that implementation of the Plan would result in significant traffic impacts, they summarize information related to the traffic analysis from the Draft EIR and the background Transportation Impact Study (TIS), and state that the details of the analysis were not made available for public review.

In March 2016, the San Francisco Planning Commission adopted a resolution to replace vehicular delay and LOS as a criterion for determining significant impacts pursuant to CEQA with a criterion based on VMT (see Response TR-3, p. RTC-139). Accordingly, degradation of vehicular delay and LOS is no longer considered a significant impact under CEQA and, therefore, need not be reported in the Draft EIR. The legislative intent of this change as stated under SB 743, is to more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

Thus, because automobile delay is no longer used for CEQA environmental review in San Francisco, intersection delay and LOS at study intersections within the transportation study area were not included in the Draft EIR. However, a discussion of the general effects of the Plan on intersection and freeway ramp operations is presented on Draft EIR pp. IV.D-41 through IV.D-43 for informational purposes only. The Central SoMa Plan TIS[44], which is referenced on Draft EIR p. IV.D-1 and included as part of the Administrative Record and is, therefore, available for public review, provides additional discussion and background information related to the analysis of intersections and freeway ramps (see Chapter 8, Intersection and Freeway Ramp Operations, on TIS pp. 289 through 338, and TIS Technical Appendix C, Intersection and Freeway Ramp Analysis). The comments restate portions of this discussion for emphasis. The Draft EIR includes a discussion of vehicle traffic that is expected to be generated by development under the Plan for existing plus Plan and 2040 cumulative conditions on Draft EIR pp. IV.D-32 through IV.D-35.

A comment asserts that the shift in LOS results do not distinguish between what "deterioration" is due to traffic generated by the proposed development under the Plan and what is due to the street network changes components of the Plan. This assertion is incorrect. Alternative 5, Land Use Plan Only, presented in Chapter VI, Alternatives, presents an analysis of the Plan's proposed rezoning proposal without the street network changes. The TIS also provides a comparison of conditions for development under the Plan without and with the proposed street network changes. As such, no revisions to the Draft EIR are required.

Comment TR-6: Transportation Impact Figures

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

O-YBNC-Light-1.2
O-YBNC-Light-2.1
I-Meader.2

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[44] The TIS is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2011.1356E.

"There is no graphic depicting the impacts of the proposed changes. It is not clear what the impact of the different alternatives is at each intersection, and how the Level of Service (LOS) changes under each.

"The 2-way option must clearly show changes to Left turns under the proposed plan. Currently, to find graphic information on Left turns one must go to the Appendix - which is not accessible to everyone - and search through, diagram by diagram, to find the correct one. And those graphics in the appendix only show the physical design change, not the service impact to that intersection. A graphic is needed that identifies where left turns will change under the 2-way alternative, where they will/won't be allowed, where provisions for left turns will cause additional delays, or where no left turns will improve congestion.

"Bay Bridge on-ramps and queueing should be shown in a single graphic for each proposal, so it the differences can be easily compared. This should include impacts to congestion, which in some cases will result in increased congestion and in others will result in reduced congestion, depending on the street and ramp/queue locations." *(Alice Light, The Yerba Buena Neighborhood Consortium, Letter, January 19, 2017 [O-YBNC-Light-1.2])*

"And right now, unless you're a transportation planner, it's extremely difficult to understand what the impacts are from the Folsom and Howard Street changes.

"These changes will have a huge impact on everyone who lives and works in Soma. And for that reason it's really important that the way it's presented it is clear to us what the consequences are of these projects.

"Right now, the reader is -- if they want to figure this out, they need to go dig through different sections of the plan. If you want to see any graphics, you have to go back to the appendix, which is not accessible to everyone. And, basically, you're required to find a lot of scattered information and try to consolidate it yourself and figure out what is happening.

"So there really needs -- because of the extent of these changes, there really needs to be a single section that lays them out very clearly and has accompanying graphics that show the impacts.

"So, for example, there should be side-by-side graphics of both alternatives, that show the impact level of service at each intersection. There should be another graphic of the impacts of left -- left turns on each intersection, where there are or aren't left turns, where the turns may increase congestion, where no turns will improve congestion.

"And there should also be a graphic, side-by-side graphic for each alternative that show the queuing and lining up for the ramps to get onto the freeway so that, in some cases, streets will see less congestion, and in some cases, they will see more.

"But that information will really help us understand what we're looking at and provide, again, a simple way in one place with the graphics will help us understand what's going to happen to our neighborhood. Thank you." *(Alice Light, The Yerba Buena Neighborhood Consortium, Letter, January 19, 2017 [O-YBNC-Light-2.1])*

"That's also very close, ground zero to getting on the Bay Bridge. These buildings, as suggested, are going to be hundreds of feet tall, including hotels. And it's hard to believe that there's not going to be additional auto traffic,

at that location, which is not going to be helpful as far as the bridge goes." *(Arthur Meader, Hearing Transcript, January 26, 2017 [I-Meader.2])*

Response TR-6

These comments request that additional figures be included as part of the Draft EIR or remark on the merits or style of those figures that were or were not included.

Draft EIR Appendix F (included on CD) contains plan- and cross-section-level figures of all of the street segments where street network changes are considered as part of the Plan (also see Response PD-11, p. RTC-84). Draft EIR Appendix F is available online on the Planning Department's website (http://sf-planning.org/AREA-PLAN-EIRS), and a hard copy of the entire Draft EIR appendix is available for review at the Planning Department offices at 1650 Mission Street, 4th Floor, as part of Planning Department Case No. 2011.1356E. The Planning Department did not receive any request for hard copies of Appendix F.

The Plan and cross-section figures in Draft EIR Appendix F include the locations where intersection left-turns are proposed as part of the Howard/Folsom Two-Way Option, which is requested by one of the comments. The figures include a note that they are intended for illustrative purposes only, to help readers visualize and understand the proposed project at a conceptual level. Details such as vehicle, transit, bicycle lane, and sidewalk widths, location of passenger and commercial loading, driveway curb cuts, and on-street parking regulations will be refined and confirmed during the final design phase of the project. Any changes to the street network changes components of the Plan as part of the final design phase will be assessed to determine whether additional environmental review is required. Further, as stated below, the street network change projects would be designed to meet City, National Association of City Transportation Officials (NACTO), California Manual of Uniform Traffic Control Devices (MUTCD), and Federal Highway Association (FHWA) recommendations and standards, as appropriate. In addition, the Draft EIR and TIS include numerous figures that help communicate the extents and components of the Plan, as well as its potential effect on the transportation network. These include approximately 40 figures included in TIS Chapter 2.1, Project Description, pp. 25 through 84, and approximately 25 figures summarizing the effect of the land use and street network changes proposed by the Plan on the pedestrian and vehicular networks of the transportation study area.

Intersection operation figures are not included in the Draft EIR because, as discussed in Response TR-5, intersection LOS is not considered in evaluating transportation impacts. However, the results of the transportation analysis are displayed graphically as TIS Figures 65A, 65B, 66A, 66B on pp. 306, 307, 312, and 313, respectively.

Comment TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles

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

A-CPC-Richards.6
O-SOMCAN-Cabande.6
O-VEC.6
I-Hestor-2.3

"And the other point -- I think we've been talking about this quite a bit. All the transit and the capacity of the roads, et cetera, for vehicles, do they consider the change that we're really seeing in Uber, Lyft and on-demand delivery services? I think that's important. Took an Uber over; I already ordered my Munchery dinner for when I get home, whenever that's going to be; it will be sitting on my front stoop." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.6])*

"**3. The … Impact of Ride Hailing Companies Within and Adjacent to the Plan Area of the DEIR are Not Fully Considered**

"The DEIR is also negligent in assessing the new impacts of ride-hailing/Transportation Network Company (TNC) services like Uber and Lyft. The references in the DEIR on pages IV.D-65 and IV.D-76 are completely inadequate. Their impact can in no way be equated with bicycles in terms of traffic or environmental impact. Their vehicles circle endlessly as they aim to be proximate to the next person who orders their services such as rides and food deliveries. As more office space and more residences are built in the Plan Area, the volume and impacts from these services will increase dramatically. The DEIR completely ignores this environmental impact.

"The increase in ride-hailing/TNC traffic not only increases 'Vehicle Miles Traveled' (the new CEQA standard in assessing traffic impacts) it will also impact the 'Level of Service' (the CEQA previous standard) at many intersections. It will also impact pedestrian safety in ways that have not been studied. All of these omissions--inadequately evaluating the transportation infrastructure needs of the current and increased future population and the lack of proper analysis of ride-sharing traffic-- make the DEIR dangerously deficient." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.6])*

"Much of the analysis focused on the present and future impacts of transportation within the Plan Area is in accordance with the outdated San Francisco Planning Department's 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (IV.D-1). However, these guidelines do not include analysis of TNC vehicles (e.g. Lyft, Uber, etc.) or private transit buses (e.g. Chariot). We request that the Planning Department provide a study and deeper analysis on the impact of these alternate vehicle transportation within the Plan Area. The plan should include proposals for regulations for these types of transportation and identify additional passenger loading/unloading zones within the plan area that will prevent congestion and be safe for pedestrians and drivers." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.6])*

"Uber and Lyft have started and become a disruption of traffic because they stop in the middle of traffic lanes on the north-south street. They don't obey traffic prohibitions. They take illegal turns and make all kinds of weird maneuvers, and they're disrupting traffic, and they're disrupting Muni.

"We've also had a shift from retail to trucks delivering packages and meals. And that is massive in the transportation analysis." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.3])*

Response TR-7

Editor's Note: The following terms are used in this response and are defined here for reference.

For-hire vehicles: typically defined as pre-arranged transportation services, using pick-up coordination technology with a distance-based fare system or flat-fee, which can be a shared ride or not, for compensation through a technology application to connect drivers using their personal motor vehicles with passengers. For-hire vehicles also include food and e-commerce delivery using private automobiles, and ride-hailing from the sidewalk often using a taxi. Different types of for-hire vehicles are may include:

> **Ride-hailing services** (e.g., transportation network companies such as Uber and Lyft)**:** Hailed via smart phone application (regulated by the California Public Utilities Commission as transportation network companies)
>
> **Taxis:** Hailed either on-street or via telephone or the smart phone application Flywheel (regulated by the City as motor vehicles for hire, Article 1100 of the San Francisco Transportation Code)[45]
>
> **Private transit vehicles** (e.g. Chariot)**:** A privately operated shuttle service, typically available to the general public, enabled by technology that usually operates along a dynamically generated route and offers bus-stop-similar service in a bus or van.

The comments raise several concerns regarding the existing level of transportation network company (TNC) vehicles and delivery service vehicles in the City, as well as the increase in TNCs and delivery service vehicles that the commenters assume will occur due to development under the Plan. Specifically, the comments request additional information and clarification regarding whether both the projected increase in TNC vehicles demand and vehicle miles traveled (VMT) were accounted for in the analysis and assessment of the Plan; whether TNC vehicles or private transit buses potentially generated by development under the Plan would have an effect on cyclists, pedestrians, and loading; and whether the City's significance criteria used as part of this assessment accounts for these potential effects. Finally, one of the commenters calls for the Planning Department to embark on a separate study of the effects of TNC vehicles in the Plan Area that should include recommendations for regulations. Finally, a number of comments raise concerns regarding the increase in e-commerce delivery services and the effect of these vehicles in the transportation analysis.

TNCs and VMT

As noted on Draft EIR pp. IV.D-33 to IV.D-35, SF-CHAMP, the city's travel demand model, was used to estimate VMT from private automobiles and taxis, the latter of which is a type of for-hire vehicle, like TNCs. The observed data within SF-CHAMP is from the years with the latest data available, 2010-2012. Since that time, the prevalence of for-hire vehicles has increased in San Francisco, mostly due to growth in the number of TNC vehicles. SF-CHAMP estimates the probability of driving based on auto ownership, household income, and other variables. To the extent that people previously would have traveled in another personal or for-hire vehicle (i.e., taxi), but now travel using a TNC service, this would be accounted for in previous household travel surveys and thus would be accounted for in VMT estimates from SF-CHAMP.

[45] Taxis are not discussed further in this response because SFMTA data indicate that the number of daily TNC trips far exceeds the number of daily taxi trips and, while TNC trips have been increasing, taxi trips have been decreasing in number.

The largest shift in trips generated by the Plan, as noted on Draft EIR pp. IV.D-32 to IV.D-35, both by magnitude and percentage increase, is 'other' trips, which include mostly walk trips, but also bicycle, motorcycle, and taxi/TNC vehicle trips. Thus, with the Plan, more people may choose to travel via walking and bicycling due to both the increase in complementary land uses in the Plan Area (e.g., jobs, housing, retail, etc.) and street network changes associated with the Plan. However, TNCs would also make up a portion of the vehicle trips generated by development under the Plan. The volume of vehicle travel (including private cars, taxis, TNCs, delivery vehicles, trucks, and private buses) is subject to roadway capacity, which is one of the key inputs of the travel demand forecasting process in San Francisco. The travel demand presented on Draft EIR pp. IV.D-32 to IV.D-35 is based on a future condition in which the convenience of vehicle travel during peak periods would have decreased due to congestion associated with the limited roadway capacity (i.e., saturated conditions). As presented in Draft EIR Table IV.D-5, Average Daily VMT per Capita, Plan Bay Area Data, 2005 Baseline and 2040 (with Central SoMa Plan) Conditions, p. IV.D-37, the VMT per capita for the Plan Area is substantially lower than for the region as a whole. Due to this, although demand for travel via personal or TNC vehicles may increase, the overall number of vehicles on the roadway is limited by the roadway capacity during peak periods of travel. Essentially, roadway capacity functions as a limit on the amount of vehicles on the roadway at any one time regardless of if they are TNC or personal vehicles.

Furthermore, while there have been changes to the travel network as a result of TNCs and delivery services, an increase in *total* VMT does not in and of itself constitute a significant impact on the environment. The analysis of future mode shares in the Central SoMa Plan Area supports the conclusion that VMT *per capita* would remain below the regional threshold, and even with the trend of increased for-hire vehicles, development within the Central SoMa Plan Area would not cause substantial additional VMT per capita or substantially increase automobile travel. The commenters have not substantiated their claims that the Central SoMa Plan development and the trend in increased for-hire vehicles would result in VMT per capita in the Central SoMa Plan Area exceeding the threshold of significance.

There is limited information as to how the introduction/adoption of TNCs affects travel behavior (e.g., whether people using these services are making trips they would not otherwise make, or substituting a TNC ride for a trip they would make by another mode).[46] The Census Bureau and other government sources do not include TNC vehicles as a separate travel mode category when conducting survey/data collection (e.g., American Community Survey, Decennial Census). Thus, little can be determined from these standard data sources. Further, the TNCs are private businesses and generally choose not to disclose specific information regarding the number of vehicles or drivers in their service fleet, miles driven with or without passengers, passengers transported, etc., except as may be required under California Public Utilities Commission regulations. As of the date of this response to comments document, the California Public Utilities Commission has not made this data available to the public or to the City for transportation policy analysis purposes. The inability to access the relevant data hampers the Planning Department's ability to fully assess the effects of TNCs on the city's transportation system and to identify related environmental impacts. Notwithstanding these limitations, the currently available research looking at the effects of TNCs is discussed below:

[46] A TNC has introduced an online platform with the purported goal of helping "urban planning around the world." However, that platform does not provide granular data in order for San Francisco to assess VMT or other impacts from TNCs.

- The *TNCs Today*[47] report, released by the San Francisco County Transportation Authority in June 2017 provides some information on TNC trip volumes, frequencies, and geographic coverage in San Francisco, although the study only looked at intra-city trips (i.e., those that both started and ended in the City limits). The report, which compiled one month of pick-up and drop-off data for intra-city trips, is an important milestone in understanding how many TNC trips are taking place in San Francisco, where and when the trips are taking place, and the volume of VMT these trips generate. The report found that the highest concentration of TNC pick-ups and drop-offs occurs in San Francisco's downtown and northeastern core, including the North Beach, Financial District, and South of Market neighborhoods. The report also indicates that on Fridays and Saturdays in San Francisco, there may be more than 220,000 TNC trips made daily in San Francisco, with between 130,000 and 188,000 daily trips on weekdays. This represents around 20 percent of local VMT (i.e., trips within San Francisco only) and 6.5 percent of total VMT (including regional trips). An increase in total VMT does not in and of itself constitute a significant impact on the environment, as CEQA criteria uses a VMT per capita efficiency metric. In addition to omitting regional TNC trips to or from the City, this study does not attempt to quantify mode shift or induced travel demand. For these reasons, the VMT estimates in the study, which only account for travel within the City, cannot be compared to the VMT results from the SF CHAMP model used for the EIR, which account for travel into, within, and out of the City. The report notes that the SFMTA and the Transportation Authority will attempt to collect more data to study issues such as safety, congestion, and mode shift impacts of TNCs. At this time, however, it is unknown if sufficient data will be available to quantitatively document how TNC operations influence overall travel demand and conditions in San Francisco or elsewhere, including the loading demand or VMT impacts of the project.

- The UC Davis Institute of Transportation Studies published a report in October 2017 providing insights on the adoption of, use, and travel behavior impacts of ride-hailing.[48] The paper deployed a travel and residential survey in seven major U.S. Cities (including San Francisco) from 2014 to 2016. The study looked at users in Boston, Chicago, Los Angeles, New York, the San Francisco Bay Area, Seattle, and Washington, D.C. A total of 4,094 completed survey responses were collected between the two surveys, with 2,217 from respondents residing in dense, urban neighborhoods and 1,877 from more suburban locations. The survey responses for this report were evenly distributed between the five metropolitan regions, Boston, Chicago, New York, Seattle, and Washington, D.C. for Survey 1, and with an oversampling of respondents for the San Francisco and Los Angeles regions for Survey 2. This study is a survey of user preferences (stated preference), as opposed to observed behavior.

  The surveys show that 21 to 30 percent of adults use TNCs. Of this percentage, 24 percent of the adults use TNCs on a weekly or daily basis. In other words, only approximately one quarter of adults use TNCs and only approximately one quarter of those adults use TNCs semi-regularly or regularly, but not necessarily for all trips. The study states that absent a ride-hailing (i.e., TNC) option, people would have foregone between 49 and 61 percent of trips (i.e., induced travel), or people would have made these trips via transit, bike, or foot instead (i.e., mode change). TNCs also result in "dead heading" miles, or miles driven without passengers. Although the researchers do not attempt to quantify VMT from the induced travel, mode change, or dead heading, the researchers conclude that TNCs are "likely" to contribute to growth in VMT in cities.

[47] "TNCs Today," San Francisco County Transportation Authority, June 2017, *http://www.sfcta.org/sites/default/files/content/Planning/TNCs/TNCs_Today_112917*.pdf.

[48] Clewlow, Regina R. and Gouri S. Mishra (2017) Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States. Institute of Transportation Studies, University of California, Davis, Research Report UCD-ITS-RR-17-07, *https://itspubs.ucdavis.edu/wp-content/themes/ucdavis/pubs/download_pdf.php?id=2752*.

The report also states that there is an increasing data gap between private "mobility operators" (including both TNCs and car-share operators) and public-sector employees and decision-makers who make transportation planning and policy decisions. As private mobility services providers continue to rapidly expand service, they gather large amounts of data about how people move in cities – data that for the most part, are unavailable to transportation planners, according to the report. Limited data in the public sector perpetuates less-informed decision making, which in turn may result in transportation systems that do not meet the public's needs, or may meet the needs of only a share of the population. The report identifies several potential solutions for closing this data gap between private mobility operators and the public sector, including mandating data-sharing by mobility operators in exchange for the use of public streets and investment in more frequent data collection efforts. For example, the New York Taxi & Limousine Commission in 2015 approved regulations requiring companies like Uber and Lyft to share detailed data on rides in New York City.[49] However, the report notes that, while research into data from ride-hailing providers may provide information on utilization, demographics, and VMT, the individuals' decisions regarding use of TNCs must be gathered from surveys.

- The SFMTA recently released a 2017 Travel Decisions Survey,[50] which used a stated preference survey. The survey was conducted as a telephone study among 804 Bay Area residents aged 18 and older during February to April 2017. The primary goals for this study were to assess the percent mode share for travel in SF to evaluate the SFMTA Strategic Objective 2.3 which calls for a mode share target of 50 percent non-private auto travel, based on the number of trips to, from, and within SF by Bay Area residents. A comparison report to past travel decision surveys was also prepared between the years 2013 to 2017. This comparison report found that fewer than 50 percent of trips are being made by the auto mode share (including TNCs) in every year since 2013, and total private vehicle mode share (excluding TNCs) has decreased from 48 percent of trips to 43 percent of trips since 2013. The report (Table 4) shows that while TNC trips have increased from 2 percent in 2014 to 4 percent in 2017, the overall auto mode share has stayed between 45 to 47 percent during these years. This effort concluded that since the last fiscal year (2015–2016), the number of driving trips declined from 1.9 million to 1.8 million, even as San Francisco saw a 2 percent overall increase in the number of trips (made by any means), to 4.1 million.

While these studies provide useful information about the effects of TNCs, many details regarding how these companies fit into the larger transportation picture in San Francisco remain unclear due to lack of access to the relevant data.

Although the effects TNCs would have on the VMT estimates from SF-CHAMP are unknown at this time, it is possible that TNCs operating in the Plan Area could result in some increase in VMT per capita, compared to that anticipated without TNCs, and possibly an increase compared to existing conditions. However, it is highly unlikely that the VMT estimates would increase to a level such that the project's VMT impacts would be significant. As stated in Response TR-3, baseline (2005) average daily VMT per capita is 2.8 for the Plan Area, or 83 percent below the baseline regional average daily VMT per capita of 16.2, and approximately 80 percent below the 15 percent below regional average threshold of 13.8. Therefore, at this location, TNCs would need to increase per capita VMT by nearly 400 percent—from 2.8 to 13.8—in order for the Plan Area to exceed the VMT threshold. In other words, the proliferation of TNCs would need to be four times stronger than all other variables (e.g., density, diversity of land uses, proximity to transit, etc.) affecting VMT at this location, which is unlikely.

[49] Morris, D. Z. (2017, February 5). New York City Says Uber Must Share Ride Data. Fortune. Retrieved from: http://www.fortune.com

[50] San Francisco Municipal Transportation Agency (SFMTA) Travel Decisions Survey 2017 Summary Report, Corey, Canapary, & Galanis Research.

A substantial increase in VMT could occur if TNC trips were considerably longer than other trips, if TNCs spent a large percentage of their time traveling empty, if a substantial number of people switched from sustainable modes to TNCs at a substantial rate, and if TNCs induced a substantial number of people to make a substantial number of trips they otherwise would not have taken. Based on the available information, including the studies cited above, it is unknown whether these circumstances would occur, but as stated above, it is unlikely that TNC usage would increase to levels resulting in a significant VMT impact. The suggestion that the Planning Department embark on a study of the effects of TNC vehicles in the Plan Area that should include recommendations for regulations is noted. San Francisco is studying the effects of these services under the direction of multiple City agencies. The Transportation Authority, SFMTA, and the Planning Department are leading most of the efforts, while consulting with each other to share knowledge, methodology, resources, and data. The *TNCs Today* report is the first in a series of reports that the Transportation Authority and SFMTA are preparing. As stated in the *TNCs Today* report: "Subsequent reports will address important analytic and policy questions regarding TNC activity in San Francisco. These future studies will assess TNC policies, best practices, and a range of topics that reflect citywide goals including: safety, transit ridership and performance, congestion and air quality, disabled access and equity, and land use and curb management." As noted above, however, there is to date an inherent difficulty in the City obtaining sufficient information from private TNC operators to allow for detailed investigation.

As of the publication of this RTC document, there are not sufficient data available to draw conclusions about these topics; any further analysis would be speculative and, therefore, requires no further discussion pursuant to CEQA Guidelines Section 15145 (if a lead agency, after thorough investigation, "finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact"). Pursuant to CEQA Guidelines Section 15384, speculation does not constitute substantial evidence on which a conclusion regarding the existence of a significant impact can be made. Because, despite recently completed and ongoing studies, the City currently lacks sufficient data to analyze the influence of TNCs on overall travel conditions in San Francisco (including, for example, data regarding mode splits), the effects of TNCs on transportation are considered speculative and, pursuant to the CEQA Guidelines, should not be considered in making an impact determination. This Draft EIR relies on the best information available about the existing and future travel patterns at the time of publication to provide the public and decision makers with the best information possible on which to evaluate the Plan.

TNCs and Loading

One of the comments requests that the Plan identify new locations for passenger loading/unloading zones within the Plan Area that would minimize potential for congestion and be safer for pedestrians and drivers. As noted on pp. IV.D-68 to IV.D-75 of the Draft EIR and addressed in Response TR-8, p. RTC-175, development under the Plan and the street network changes would result in a significant and unavoidable impact related to loading, including passenger loading. This is because, while the Plan itself would foster both residential and employment growth, the proposed street network changes would result in the loss or relocation of some passenger loading (white) zones as well as freight loading (yellow) zones, which also permit passenger loading. Other white and yellow zones could be unavailable during peak hours due to proposed tow-away restrictions. Among the specific locations that could be affected by potential relocation of white zones are Moscone Center, hotels on Third and Fourth streets, and the Bessie Carmichael School/Filipino Education Center on Harrison Street between Fourth and Fifth streets. New and/or relocated white (and yellow) zones could be permitted by

SFMTA in the Plan Area, as well as elsewhere in San Francisco, for buildings and/or uses that have active passenger loading and unloading needs, such as residential buildings with more than 50 dwelling units, as well as senior centers, hotels, and certain restaurants and medical offices. However, because the Plan would relocate, eliminate, or partially eliminate some white and yellow zones, and because replacement of white and/or yellow zones may not always be possible due to conditions such as existing parking prohibitions or lack of general on-street spaces that could be converted to passenger loading spaces, the Draft EIR identified a significant impact with respect to loading.

The Draft EIR identified Mitigation Measure M-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones, to accommodate both passenger and freight loading. Under this measure, SFMTA would develop a curb management strategy for projects developed under the Central SoMa Plan, including the street network changes, that articulates curb use priorities for different types of streets, while safely managing loading demands. This strategy should guide the approach to any affected commercial and passenger loading/unloading zones (loading zones) during any City agency's development of detailed plans for each segment of the proposed street network changes. Replacement of loading zones would be considered, to the extent feasible. This mitigation measure would be implemented in conjunction with the proposed street network changes, which are meant to be flexible and responsive to the needs of the streets on which they are proposed. This means that details, including location of passenger and commercial loading, would be refined and confirmed during the design phase of the proposal as well as designed to meet street design recommendations and standards, as appropriate, through the design process. This design process also includes the appropriate City agencies weighing the potential effects of proposed changes against the land use and transportation goals of the City and the Plan. The design process would also consider on-street commercial vehicle and passenger loading supply needs for new development.

Thus, the design of the Plan's street network changes would consider the potential relocation of passenger and commercial vehicle loading areas as well as be responsive to the need for new passenger and commercial vehicle loading areas due to increased demand, and to ensure passenger loading/unloading is conducted in appropriate locations and in such a way that does not result in significant conflicts with transit, bicyclists, pedestrians or other vehicles, or result in potentially hazardous conditions. Nevertheless, because the feasibility of ensuring adequate passenger and freight loading cannot be assured in advance, and because other goals, such as provision of dedicated transit lanes, could in some circumstances outweigh the desire for convenient on-street loading—whether for passengers traveling in private cars, taxis, or TNC vehicles, conventional freight, or e-commerce deliveries—the Draft EIR concludes that effects of the Plan, including the street network changes, on passenger and freight loading would be ***significant and unavoidable***.

For informational purposes, San Francisco Planning Department is currently updating the Transportation Impact Analysis Guidelines,[51] which the department uses to assess transportation impacts under CEQA. The Planning Commission hosted an informational item regarding the scope of the guidelines update on September 28, 2017. As part of the guidelines update the department hired a consulting firm to collect, analyze, and interpret data at dozens of development sites throughout San Francisco. The department will review the results of the analysis. It is the department's intent to calculate future loading demand separately: off-street (generally, larger freight via trucks using building loading docks) versus on-street (passenger and, generally, smaller freight/package delivery). However, at this point, the department cannot guarantee that these efforts will gather

[51] More details available here: http://sf-planning.org/transportation-impact-analysis-guidelines-environmental-review-update.

enough data to incorporate into the guidelines update in 2018 or whether the department or others will need to collect additional data to provide such estimates.

Nevertheless, the department addresses loading demand through a variety of processes. During the development review process for individual projects, the department consults with the SFMTA Color Curb Program manager regularly regarding the length, location, and hour restrictions of any proposed changes to color curb designations. In addition, department staff leads streetscape design advisory team meetings. Staff from the SFMTA, San Francisco Public Works, and the SFPUC are also members of the streetscape team. Developments that trigger the large project requirements of Planning Code section 138.1 (Streetscape and Pedestrian Improvements) and certain other projects require streetscape design review. The streetscape team reviews the technical aspects of a development's localized transportation impacts (e.g., vehicular conflicts with other ways of travel along the development's frontage, compatibility with future streetscape designs).

TNCs and Pedestrian Safety

One comment claims that growth in TNC usage will affect pedestrian safety. Although the comment provides no specific information or examples of such effects, it may be postulated that the commenter suggests that increased traffic results in decreased pedestrian safety. As discussed in more detail in Response TR-9 below, the Draft EIR does not identify a significant impact with respect to pedestrian safety, in substantial part because the Plan's proposed street network changes were specifically designed to improve pedestrian (and bicycle) safety and mobility throughout the Plan Area. For example, key elements of the proposed street network changes include transit-only lanes and protected bicycle lanes, which all act to separate transit vehicles and cyclists from any double parked and loading vehicles, regardless of whether or not they are TNCs. Moreover, the Plan would address many existing pedestrian impediments, as well as the forecast increase in Plan Area pedestrian volumes, through street network changes consistent with Vision Zero and the *Better Streets Plan*, including, where possible, sidewalk widening, corner sidewalk extensions, pedestrian signal timing upgrades, signalized midblock pedestrian crossings, and opening currently closed crosswalks. These improvements would enhance pedestrian conditions and reduce the potential for vehicle-pedestrian and bicycle-pedestrian conflicts, thereby reducing the potential for collisions and improving safety. Moreover, the Plan would not introduce design features that would result in hazards.

Delivery Services

The City's commercial vehicle loading demand methodology is based on the most recent and comprehensive information available in the SF Guidelines, to assess the loading impacts of increased development in the Plan Area. The SF Guidelines methodology for analyzing truck and service vehicle loading demand, including e-commerce delivery vehicles, assesses whether the peak loading demand could be accommodated within the proposed facilities and considers the loading demand for the nine-hour period between 8 a.m. and 5 p.m. The analysis of loading demand calculates the peak number of loading spaces needed to accommodate the estimated demand during the nine-hour period that overlaps with the morning and evening commute periods. For example, the loading demand does not take into account delivery trips that occur during the early morning (e.g., trash removal, store food deliveries) or in the evening (e.g., restaurant food deliveries). These types of delivery trips are typically not accommodated onsite and generally occur outside of the peak commute periods when the number of pedestrians, bicyclists, transit, and other vehicles is lowest. The effects of various vehicles (delivery,

private, for-hire, etc.) were considered in the assessment of impacts on bicyclists, pedestrians, and transit in the Draft EIR, as described above.

Impacts of development under the Plan on loading are presented in Draft EIR Impact TR-6, pp. IV.D-68 through IV.D-75, and include discussion of truck and service vehicle loading demand, accommodation of commercial loading demand, and passenger loading/unloading activities. The analysis found that implementation of the Plan would result in an inadequate supply of on-street commercial loading spaces that in some locations would disrupt transit, bicycle, and vehicle circulation, and could potentially cause hazardous conditions and, therefore, significant loading impacts were identified. See Response TR-10, p. RTC-175, for discussion of loading impacts and mitigation measures identified to address these impacts.

TNCs are a relatively new phenomenon in passenger movement, and delivery services have changed in recent years with the advent of new delivery services via private automobiles for groceries (e.g., Instacart), meals (Munchery, Thistle, and others), and even other goods. Similar to TNCs, there is no good source of data as to the prevalence of such services (in part because some of these services have started or stopped business only recently), although anecdotal information suggests that personal-vehicle deliveries are considerably less prevalent than trips made by TNC services.

With respect to e-commerce delivery by traditional freight carriers, such as United Parcel Service (UPS), Federal Express (FedEx), and the U.S. Postal Service (USPS)—which deliver the vast majority of e-commerce packages—the volume of deliveries has increased dramatically in recent years. From 2011 to 2016, FedEx average daily volume (express and ground shipments) increased by 59 percent, while UPS average daily volume (next day, deferred, and ground shipments) increased by 21 percent. In that same period, the USPS delivered 58 percent more packages (including both parcel post and first-class and priority packages).[52] However, it is noted that such parcel deliveries are typically distributed throughout the day.

Private Transit Services

One comment mentioned the advent of private transit services in San Francisco. As of the writing of this RTC document, the only such service operating is Chariot, which provides scheduled peak-period service from various San Francisco neighborhoods to and from downtown. Currently, Chariot operates eight routes.[53] Unlike public transit such as Muni, Chariot riders must reserve a seat in advance, using a smartphone application. In October 2017, the SFMTA Board of Directors adopted a new permit program for so-called private transit vehicles (PTVs), defined as a vehicle used to provide transportation to the public and charge an individual fare, but excluding taxis, state-regulated vehicles such as TNCs, out-of-city transit vehicles, and certain private shuttle buses. The program includes regulations that cover location of stops and routes, data collection, insurance requirements, vehicle size (limited to 25 feet), emissions standards, driver training, vehicle accessibility, and provision of public information. At present, this program applies only to Chariot.[54] The regulatory scheme is

[52] UPS, Annual Reports for 2016 and 2011 (available at: http://www.investors.ups.com/phoenix.zhtml?c=62900&p=irol-reportsannual); FedEx, Annual Reports for 2017 and 2011 (available at: http://investors.fedex.com/financial-information/annual-reports/default.aspx); USPS, Postal Facts 2017 (available at: https://about.usps.com/who-we-are/postal-facts/postalfacts2017.pdf). Accessed January 30, 2018).

[53] Chariot also provides private shuttle service to corporate clients, including some with workplaces outside San Francisco. In this, it is similar to other privately operated, employer-sponsored shuttle buses that transport workers from San Francisco to out-of-city workplaces, primarily in San Mateo and Santa Clara counties.

[54] Separately, the City has a permit program for employer-sponsored shuttles, many of which operate larger vehicles than PTVs.

anticipated to allow the SFMTA to gain access to far more ridership data regarding PTVs than is currently available from TNC operators.

Conclusion

TNC vehicles and deliveries resulting from increasing e-commerce are both important phenomena in transportation analysis and policy in San Francisco. Data available to public agencies that would allow for a robust analysis of either of these components of the City's transportation system is largely lacking, although various City departments are engaged in collecting information, particularly regarding TNCs. It is noted that growth in travel via TNC vehicles, as well as increased demand for home and workplace delivery of e-commerce purchases, whether merchandise or meals, has been occurring independently of the proposed Plan, and such growth can be expected to continue regardless of whether the Plan is adopted. Therefore, while growth in TNC and e-commerce delivery services is real, the Plan would have little effect on existing and future TNC and e-commerce delivery operations. Regarding private transit services, the City has better information and already regulates such services.

Based on the foregoing discussion, the Draft EIR relies on the best available information in its analysis of potential transportation impacts of the Central SoMa Plan. Attempting to delve more deeply into impacts of TNC operations at this time, given the limited information available, would be speculative, and CEQA does not require speculative analysis.

Comment TR-8: Transit Impacts

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

O-SOMCAN-Cabande.5
O-CSN-1.62
O-YBCBD.5
I-Hestor-2.5

"**3. The Inadequate Transportation Infrastructure … Within and Adjacent to the Plan Area of the DEIR are Not Fully Considered**

"The transportation infrastructure within and adjacent to the plan area of the Central SoMa DEIR lags far behind the infrastructure needs of both past and current growth. This is true, even if you factor in the transportation improvements that are underway, such as the Central Subway.

"The Central So Ma Plan is predicated on the construction of the Central Subway that connects Central SoMa with Chinatown. The Central Subway addresses a transit need that is long overdue as public transit for SoMa has been inadequate for decades. Because of years of lack of infrastructure improvements, the Central Subway is addressing a past need, not a present or future need. As State Senator Scott Wiener has said, 'San Francisco's unfunded transportation needs are billions and billions of dollars' because 'MTA has a long history of not moving quickly enough on important capital projects'[6] Thus, even with the new Central Subway, the transportation infrastructure will continue to be inadequate.

"There is also mention of the construction of the new Transbay Terminal just to the east of the Central SoMa Plan Area. However, Transbay Terminal won't be completed for some time, and it is unclear whether it will connect with CalTrain. Also, proximity to BART should not factor into the Central SoMa Plan because it runs down Market Street which is two to three long blocks north of the Central SoMa Plan Area. BART is not only far from the Plan Area, it has its own issues with capital obsolescence, and is hardly in condition to accommodate dramatic growth."

Footnote:

[6] http://www.sfexaminer.com/wiener-proposes-major-fundraising-legislation-for-transportation-agencies-statewide/

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.5])

"**The Regional Transit Analysis Is Also Flawed Because It Fails To Disclose System Deficiencies In San Francisco That San Francisco Development Should Take a Major Role In Mitigating**

"Over capacity deficiencies on BART are not limited to the Transbay Corridor line capacity which the DEIR does disclose. Platform capacity deficiencies also exist on BART at the Embarcadero and Montgomery stations - too many people attempting to board and alight on the platforms at the same time. This affects both the movements to and from the San Francisco Southwest corridor and Peninsula Corridor as well as the Transbay Corridor. The platform capacity deficiencies are fundamentally the result of development in San Francisco. This DEIR and other prior DEIRs in San Francisco are deficient in failing to disclose this impact and failing to propose effective measures to mitigate it." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.62])*

"Given the expected increase in residents and businesses in the Central SoMa Plan Area, how is the City planning to meet the subsequent increased demand for public transit and pressure on the streets? Are transit route/schedule changes being considered to meet this demand?" *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.5])*

"You've had a massive increase -- you're supposed to have a massive increase in Muni lines based on the Eastern Neighborhoods and Western Zone Plan. Those haven't happened." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.5])*

Response TR-8

The comments cite concerns regarding BART station impacts and the ability of Muni to accommodate increased transit demand generated by development under the Plan. In addition, comments expressed concern regarding the state of the transportation infrastructure in Central SoMa, and the status of planned increases in Muni transit service.

BART Analysis

Consistent with the SF Guidelines, the impact of the proposed project on BART was conducted based on the ability of BART service to and from the East Bay and South Bay to accommodate the projected a.m. and p.m. peak hour increases in transit demand associated with development under the Plan. The capacity utilization

analysis for BART is presented in Impact TR-3, pp. IV.D-47 through IV.D-49, and implementation of the Plan would result in a substantial increase of BART ridership, resulting in a significant impact on BART operations. Implementation of Mitigation Measure M-TR-3a, Transit Enhancements, p. IV.D-53, which could result in additional funding that could be dedicated to regional transit, including BART, was identified. However, it would be speculative at this time to presume that sufficient funding could be available to offset effects of the Plan; therefore, the Plan's regional transit impact on BART was considered significant and unavoidable with mitigation.

A commenter asserted that the Draft EIR was deficient in failing to disclose BART station platform impacts on the Embarcadero and Montgomery Street BART stations. The commenter is incorrect in stating that the impacts from developments in San Francisco failed to disclose impacts on these stations. Specifically, the EIR for the Transit Center District Plan, which would be directly served by both of these stations, identified effects on BART station capacity on the Embarcadero and Montgomery Street BART stations as significant and unavoidable. This assessment was based on BART's ongoing planning assessments of station operations at the time and the amount of increased ridership generated by development under the Transit Center District Plan. A portion of the fee revenues collected within the Transit Center District Plan has been allocated towards station capacity improvements to the Montgomery Street and Embarcadero BART stations.

While the City may participate in regional transportation planning efforts, including jointly seeking funding from state and federal sources with other regional agencies, including the Metropolitan Transportation Commission, monitoring the capacity and use of BART stations would be conducted as a joint effort with BART. BART riders generated by the Central SoMa Plan are anticipated to be split between two stations: Powell Street and Montgomery Street. A vast majority of the riders would use the Powell Street BART station because most of the population and employment growth associated with the Plan would occur west of Third Street and south of Harrison Street, and many BART riders would likely use the Central Subway to connect to the Powell Street BART station, as assumed in the Draft EIR transit analysis. Overall, the Powell Street BART station has a lower passenger demand than the Embarcadero and Montgomery Street BART stations, has a more spacious concourse and platforms, and has not been identified by BART as constrained or requiring additional capacity.[55]

Furthermore, per the comment letter *Re: Central SoMa Plan Case No. 2011.1356E Comments on Draft Environmental Impact Report State Clearinghouse No. 2013042070* (Val Joseph Menotti, Chief Planning & Development Officer for BART, February 14, 2017), BART is supportive of the Plan as it fulfills the sustainability goals outlined in the BART Strategic Plan Framework vision station. As presented in the letter, the Plan "will stretch BART's ability to comfortably accommodate more customers on our trains and at Powell St. Station," but it goes on to note that the City "has been working with BART to develop a funding strategy to support future upgrades and capacity projects in the Station Modernization Plans for Powell, Montgomery and Civic Center Stations." The funding strategy includes near-term projects associated with the Bay Area Core Capacity Transit Study,[56] as well as planning and design for long-term transit capacity and station modernization improvements. These improvements would supplement the current efforts to modernize the BART fleet through new trains that are planned to begin being put into service by the end of 2017. Through these measures, the City and BART will be monitoring and addressing capacity and quality of service issues on BART trains and at stations as they arise.

[55] BART, *Powell St. BART Station Modernization Program, Final Report*, 2015.

[56] Metropolitan Transportation Commission, *Bay Area Core Capacity Transit Study, Final Report*, September 2017.

As discussed in Response TR-13, p. RTC-184, the *Central SoMa Plan Implementation Strategy* Part IIB presents the public benefits and sources of funding that would occur with implementation of the Plan.[57] Of the approximately $2.05 billion in public benefits funding derived from the various sources of funding, about $630 million would be allocated to transportation, including $500 million to transit. These funds would be available to Muni and regional transit operators to accommodate the increased transit ridership as development that would be allowed under the Central SoMa Plan occurs.

Furthermore, the Enhanced Transit Funding component of Mitigation Measure M-TR-3a identifies potential additional sources of funding, beyond those currently identified in the *Central SoMa Implementation Strategy Public Benefits Package*, that the City could pursue to supplement available funding for transit operation and capital funding, including for regional transit. However, because it is not known whether SFMTA would provide additional service on the impacted routes to fully mitigate project impacts, the Draft EIR determined that the impacts of the Plan on transit would be significant and unavoidable with mitigation.

Other Comments

A number of comments do not address the adequacy or accuracy of the Draft EIR, but instead provide comments regarding the state of the transportation infrastructure in Central SoMa, request information on whether the City is considering transit route and schedule changes, and requests information on the status of planned increases in Muni transit service.

The comment that cites the inadequate state of the transportation infrastructure within and in the vicinity of Central SoMa, the need for the Central Subway, and the need for improvements to regional transit such as the Transbay Terminal, Caltrain, and BART is noted. The Central Subway is currently under construction and will provide improved transit access through the Plan Area when it opens in 2019. The Transbay Terminal is located to the northeast of the Plan Area and is expected to be completed and open to transit carriers and passengers in 2018. The underground rail extension of Caltrain from the existing station at Fourth and King streets to the Transbay Terminal is environmentally cleared, and the timing of construction will depend on funding availability.[58] In the meantime, the existing Caltrain station at Fourth and King streets, located on the southern edge of the Plan Area, serves as the northern terminus for Caltrain and the potential future California High Speed Rail station.

Regarding the comment that a massive increase in Muni routes based on the Eastern Neighborhood and Western SoMa Plans has not happened, it is noted that neither the Eastern Neighborhoods nor Western SoMa plans included Muni service improvements. Instead, in response to this comment and the comment requesting information on whether the City is planning service improvement to accommodate increases in transit ridership, the Muni Forward project (previously referred to as the Transit Effectiveness Project, or TEP) includes roadway network and service improvements aimed at improving reliability, reducing travel times, providing more frequent service, and updating Muni bus routes and rail lines. The SFMTA Transit Effectiveness Project EIR[59]

[57] San Francisco Planning Department, *Central SoMa Plan*, Part IIB, Central SoMa Implementation Strategy, Public Benefits Package, August 2016, pp. 134–135.

[58] U.S. Department of Federal Transit Administration, City and County of San Francisco, Peninsula Corridor Joint Powers Board, and San Francisco Redevelopment Agency, *Transbay Terminal / Caltrain Downtown Extension / Redevelopment Project in the City and County of San Francisco Final Environmental Impact Statement / Environmental Impact Report and Section 4(f) Evaluation*, City Project No. 2000.048E, State Clearinghouse No. 95063004, March 2004).

[59] City and County of San Francisco Planning Department, *Final Transit Effectiveness Project EIR*, March 2014.

analysis included project-level analysis of travel time reduction proposals on six corridors, as well as service improvements consisting of new routes, route elimination, changes to route alignment, changes to headway, and/or change to vehicle type for 70 Muni routes. The Muni Forward service improvements affecting routes serving the Central SoMa Plan Area that are planned or have already been implemented by the SFMTA are presented on Draft EIR p. IV.D-6.

Comment TR-9: Pedestrian and Bicycle Impacts

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

A-SFMTA.6
O-SOMCAN-Cabande.19
O-CSN-1.31
O-CSN-1.64
O-SFBC.1
O-YBCBD.1
O-YBCBD.2
O-YBCBD.4
I-Hestor-1.4

"Page IV.D-56. Last Paragraph. The previous paragraph already lists 'leading pedestrian intervals' as an improvement being implemented in the Central SoMa transportation study area. This paragraph should list it amongst the upcoming improvements to the proposed pedestrian network." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.6])*

"We are also concerned about the vulnerability of seniors and people with disabilities while walking in the neighborhood to injury from vehicle collisions. Providing sidewalk extensions may help in some areas, but the extent of increase in automobile traffic is under-reported in the DEIR, and the potential incidents of pedestrian injuries from automobiles is also underestimated. These environmental impacts are not sufficiently studied in the DEIR." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.19])*

"**H. The Plan will have Significant Adverse Pedestrian Safety Impacts that are not Disclosed or Analyzed in the DEIR.**

"The DEIR erroneously concludes that the Plan would have less than significant impacts related to pedestrian safety. (DEIR, p. IV.D-57). This conclusion is arbitrary and capricious and lacks substantial evidence. The Plan would triple the population and number of jobs in the Plan area, adding 25,000 new residents and 63,000 new jobs. This increase alone will increase the number of vehicles and pedestrians in the area, directly increasing the number of conflicts leading to pedestrian safety issues (accidents).

"As a threshold matter, the DEIR fails to analyze the already severe pedestrian safety problem in the area that forms the CEQA baseline. The neighborhood has one of the highest incidences of pedestrian injuries in the City. As DPH stated, 'The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8).'[19] Tripling the number of pedestrians and increasing the number of vehicles will clearly increase pedestrian injuries.

"The table on pages IV.D-58-59 of the DEIR clearly shows that the number of pedestrian at certain intersections in the Plan area will increase by as much as 6 times – 600%. For example the number of pedestrians at Fourth and King Streets will increase from a current level of 246 at peak hour to 1680. (DEIR, p. IV.D-58). Several other intersections will see increases in pedestrian traffic ranging from 2 to 7 times. At the same time, the Plan will drastically increase traffic congestion. The DEIR states, 'The average delay per vehicle at the study intersections would increase with the addition of vehicle trips associated with development under the Plan… more vehicles would use Mission, Harrison, Fifth, and Sixth Streets, thereby increasing congestion on these streets.' (DEIR, p. IV.D-42). Increasing both pedestrian traffic and vehicle congestion is a recipe for increased pedestrian injuries. The DEIR conclusion to the contrary defies logic and is arbitrary and capricious. (See, SWAPE comment, p. 4-5). As pointed out by SWAPE, pedestrian safety impacts will be much worse than set forth in the DEIR because the document fails to consider all reasonably foreseeable projects, such as Pier 70, and 72 other specific project, all of which will add traffic to the area. Id.

"Traffic Engineer Daniel T. Smith, PE, concludes that the Plan will have significant impacts on pedestrian and bicycle safety that are not disclosed or analyzed in the DEIR. 'Mr. Smith concludes that the Plan will drastically increase vehicle, bicycle and pedestrian traffic in the Plan area. As a direct result, it will increase risks to pedestrian safety. The EIR's conclusion to the contrary is untenable. Mr. Smith states:

> All these hazards clearly increase with the increase of incidence of conflicts, a product of motor vehicle, bike, and pedestrian volumes. These are ultimately a function of the intensity of resident and employment population in the Project area. The DEIR is flat wrong in concluding that increased potential for conflict does not represent a hazard in the study area, especially when the areas of conflict are also areas of undisclosed increases in traffic congestion that intensify the failure to perceive the conflict or induce behavior that results in crashes.
>
> The DEIR is further unreasonable and unsupported in its assertion on page IV.D- 41 that street network changes would reduce the potential for conflicts to the extent that it would reduce the incidence of conflict to levels such that would make the traffic hazards of implementation of the plan less than significant. It has conducted no analysis of conflict incidence with and without the Plan Project and with and without the Project's purported roadway improvements. In fact, it has not relied in any way on the statistical records of accidents by location, type, movement pattern, and participant actions and impairments that are readily available to the City[20]. The entire analysis on this topic is inadequate and must be revised and recirculated in draft status. (Smith Comment, pp. 6–7)."

Footnotes:
[19] San Francisco Department of Public Health, Environmental Health, Sustainable Communities, Health Assessment: Central Corridor Plan, p. 3 (Nov. 30, 2012)
[20] We refer to the Statewide Integrated Traffic Records System (SWITRS) in which the California Highway Patrol receives all traffic reports from all jurisdictions in the state and produces summaries by jurisdiction, by road segment and intersection location, by types of vehicle involved, movements, and causal factors including operator impairments or road deficiencies.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.31])

"**The DEIR's Traffic Hazards Analysis (Impact TR-2) Is Contrary To Fundamental Engineering Principles**

"The DEIR Traffic Analysis runs contrary to fundamental engineering principles. It narrowly defines traffic hazard as '*a structure, object, or vegetation that obstructs, hinders, or impairs reasonable and safe view by drivers of other vehicles, pedestrians or bicyclists traveling on the same street and restricts the ability of the driver to stop the motor vehicle without danger of an ensuing collision*.' It acknowledges that '*new development under the plan would bring more people into the area, which would result in an increase in the potential for conflicts between vehicles, bicyclists and pedestrians*,' while explaining that '*conflicts are located where pedestrians, bicyclists, and/or drivers cross, merge, or diverge*'. However, it unreasonably claims that increases in the rate of potential for conflicts by itself does not represent a traffic hazard (as so narrowly defined by the DEIR).

"In fact, exposure to conflict is fundamental to defining accident hazard in engineering practice. Intersection accident rates and expected rates for the intersection type are defined in crashes per million annual vehicle crossings (theoretically including, as defined in the California Vehicle Code, bicycles as a vehicle). Road segment accident rates are defined as crashes per million vehicle-miles. The reasons why incidence of conflict is directly related to incidence of conflict are many. Urban roads are normally designed to meet the various design standards cited in the DEIR at page IV.D-41 or, when they don't and result in high accident occurrence or particularly severe accidents are subjected to remedial measures. The principal reason for urban motor vehicle-motor vehicle, motor vehicle – bicycle, motor vehicle – pedestrian or bicycle – pedestrian collisions is actions or omissions on the part of the driver, bicyclist or pedestrian (the principals) or both parties. Increases in the incidence of conflicts such as the Project would cause increase the hazard that actions or omissions of the principals would occur at a conflict point, hence increasing crashes. For example, in traffic congested situations, all of the principals may take actions where the potential for crashes is increased. For instance, where there is heavy queuing and blockages, pedestrians and bicyclists may be induced to cross against the indications of the traffic signal. Drivers may be motivated to make sudden movements without considering all the possible conflicts (for example but not limited to, the driver attempting to make a right-turn-on-red that perceives a limited gap in oncoming traffic to their left that attempts to make the move without checking for the pedestrian entering the crosswalk on their right or the bicyclist overtaking them on their right). Other types of crash hazards that increase with conflict incidence are, but are not limited to ones involving the bicyclist or pedestrian oblivious to traffic conflicts because of music playing on their head phones or the pedestrian or driver focused on reading (or sending) text messages or e-mails on their smart phone. All these hazards clearly increase with the increase of incidence of conflicts, a product of motor vehicle, bike, and pedestrian volumes. These are ultimately a function of the intensity of resident and employment population in the Project area. The DEIR is flat wrong in concluding that increased potential for conflict does not represent a hazard in the study area, especially when the areas of conflict are also areas of undisclosed increases in traffic congestion that intensify the failure to perceive the conflict or induce behavior that results in crashes.

"The DEIR is further unreasonable and unsupported [comment as excerpted under [O-CSN-1.31] above]." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.64])*

"By your department's analysis, development associated with the Plan would generate thousands of new trips in SoMa. As further acknowledged by the Plan, these new trips could increase the potential for vehicular-bicycle and pedestrian-bicycle conflicts by exposing additional people to existing transportation conflicts and hazards. The proposed addition of cycle tracks along Folsom, Howard, Third and Fourth Streets would expand the existing bicycle network in a meaningful way.

However, for the impacts of the Plan's street network changes on bicycle circulation to be truly less than significant, it is crucial that all of the proposed new facilities be implemented at a high level of quality. Given the history of serious and fatal crashes along the Folsom Street corridor, we know that anything less than cycle tracks designed in line with NACTO and FHWA standards along all of the proposed corridors is insufficient and will result in increasingly unsafe conditions for bicyclists." *(Janice Li, San Francisco Bicycle Coalition, Letter, February 14, 2017 [O-SFBC.1])*

"The Central SoMa Area includes many of the City's most serious high injury corridors and intersections, as referenced in the City's Vision Zero Plan. The EIR mentions numerous ideas to improve pedestrian safety, such as corner sidewalk extensions, sidewalk widening, signal timing upgrades, mid-block crossings, and opening closed sidewalks. However, the only pedestrian safety mitigation in the EIR focuses on crosswalk improvements. While crosswalk improvements are beneficial, only the combination of improvements listed in the EIR will significantly improve pedestrian safety. With this in mind, we request additional pedestrian safety mitigations to be included in the EIR." *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.1])*

"It's not clear if pedestrian scrambles (diagonal crosswalks) were studied as part of signal timing upgrades. Please clarify.

"What analysis was done on the possible re-opening of the crosswalk on the north side of Folsom Street at 3rd Street? Did you factor in that the Moscone Center South Loading Dock entrance has moved closer to Folsom Street? This is a particularly hazardous intersection for Moscone Center operations. In the absence of additional study, we recommend not including a crosswalk at this location at this time." *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.2])*

"The proposed mid-block pedestrian crossing on Howard Street between 4th and 5th streets is another hazardous area for the operations of the Moscone Center and the Intercontinental Hotel. The Moscone West Loading Dock Entrance/Exit and the Intercontinental Hotel Valet Entrance are both located in this immediate area and operate 24/hours a day. Installation of a mid-block crossing at this location will present safety, operational and other conflicts and should not be considered at this time." *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.4])*

"What are the impacts on pedestrians and bicyclists related to the goals of Vision Zero to reduce hazardous walking and biking conditions – both to persons heading to the CalTrain station and to the nearby office and residential areas?" *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.4])*

Response TR-9

The comments raise concerns related to pedestrian and bicycle circulation and safety within the Plan Area. One commenter emphasizes pedestrian safety for seniors and persons with disabilities. Specifically, there are comments suggesting that the Draft EIR erroneously concludes that the Plan would have less-than-significant impacts related to pedestrian safety hazards and overcrowding on sidewalks (significant and unavoidable impacts were identified for pedestrian conditions at crosswalks), that the baseline and methodology for the pedestrian impact assessment in the Draft EIR are incorrect, and that the potential for pedestrian collisions are underreported. In addition, there are comments that raised concerns about specific locations including the number of travel lanes on Harrison Street, walking conditions to and from Caltrain, locations for pedestrian scrambles (i.e., all-pedestrian signal phases), the reopening of a crosswalk at the intersection of Folsom/Third, and a potential midblock crosswalk planned on Howard Street between Fourth and Fifth streets.

Pedestrian Impact Summary

Pedestrian impacts are presented in Draft EIR Impact TR-4, pp. IV.D-56 through IV.D-65. The significance criteria for assessment of pedestrian impacts are presented on Draft EIR p. IV.D-24 and state that the project would have a significant effect on the environment if it would:

- Result in substantial overcrowding on public sidewalks;
- Create potentially hazardous conditions for pedestrians; or
- Otherwise interfere with pedestrian accessibility to the site and adjoining areas.

As presented on Draft EIR pp. IV.D-56 through IV.D-65, implementation of the Plan would result in substantial overcrowding of public crosswalks, thus resulting in a significant impact to pedestrian conditions. However, implementation of the Plan would not create potentially hazardous conditions for pedestrians or otherwise interfere with pedestrian accessibility in the Plan Area and adjoining areas. The below sections describe how the Draft EIR addresses the comments and concerns related to the pedestrian impact assessment and safety conditions.

Pedestrian Crowding

As presented on Draft EIR pp. IV.D-64 and IV.D-65, with proposed streetscape changes such as wider sidewalks to meet the standards in the *Better Streets Plan* and corner sidewalk extensions to enhance pedestrian safety at crosswalks, the Plan would reduce pedestrian crowding and improve pedestrian safety throughout the study area. However, the Draft EIR states that even with the proposed street network improvements, the additional pedestrian trips generated by growth under the Plan would result in significant pedestrian LOS impacts at two crosswalks near the Caltrain station at Townsend and King streets, and at the intersection of Fourth/Brannan. Additionally, with the street network changes in place, four crosswalks would degrade to unacceptable operations at the intersections of Third/Mission and Fourth/Mission due to the signal timing changes (i.e., increasing the signal cycle length from 60 to 90 seconds). It should be noted that the LOS E and LOS F conditions for crosswalks do not

represent a safety hazard, but rather that pedestrian density would increase and that pedestrians would be required to wait an unacceptably long time to cross the street, possibly encouraging risk-taking behavior.

To address the issues associated with the pedestrian crowding at these crosswalk locations, the Draft EIR includes Mitigation Measure M-TR-4, Upgrade Central SoMa Area Crosswalks, p. IV.D-64. As described on Draft EIR pp. IV.D-64 and IV.D-65, Mitigation Measure M-TR-4 would require the SFMTA to widen and restripe the crosswalks to the continental design when there is a street network improvement that upgrades sidewalk widths. Wider crosswalks at these locations would reduce the pedestrian crowding impacts at these locations to less-than-significant levels. However, because the feasibility of the crosswalk widening beyond the current width is uncertain due to roadway or other physical constraints (e.g., presence of bus stops or platforms), the pedestrian impact at the crosswalks would remain significant and unavoidable with mitigation. The locations where these impacts occur are limited, as the proposed Plan street network changes as a whole would benefit existing and future pedestrian circulation and safety throughout the Plan Area, as presented in the following sections.

Pedestrian Safety Hazards

The existing pedestrian conditions and CEQA baseline for the assessment of the Plan are presented on Draft EIR pp. IV.D-9 through IV.D-13. As presented there and on Figure IV.D-4, Missing Curb Ramps, Closed Crosswalks, and Multiple Turning Lanes, p. IV.D-12, the Plan Area currently includes many impediments to pedestrian circulation that often create an unwelcome pedestrian environment, especially for seniors and persons with disabilities. These impediments include narrow sidewalks, a lack of ADA curb ramps, high vehicle volumes and speeds turning into crosswalks across multiple travel lanes, peak hour vehicle queues that block crosswalks, and long distances between intersections limiting crossing opportunities on roadways with high vehicle speeds. This section also provides detail on specific areas where pedestrians are exposed to increased vehicle conflicts due to multiple turning lanes and wide turning radii. In particular, wide turning radii at intersection corners enable drivers to make turns at higher speeds during non-peak periods, reducing the time available for driver reaction, and increasing the frequency of pedestrian collisions and the severity of injuries. As presented on Draft EIR p. IV.D-13, these issues create a challenging pedestrian environment for the substantial number of seniors and persons with disabilities who live in the area. The discussion on the existing pedestrian conditions presented in the Draft EIR forms a reasonable CEQA baseline, and addresses the concern that the "DEIR fails to analyze the already severe pedestrian safety problem in the area that forms the CEQA baseline." While statistical records of collisions within the transportation study area were not included in the Draft EIR, nor are required to be, as discussed, the planning process involved in developing the Central SoMa Plan street network changes considered available collision data (including the data from the Department of Public Health memorandum referenced by the commenter[60]) to support observed impediments to pedestrian circulation and safety. Thus, the commenter is incorrect in stating that the Draft EIR "has not relied in any way on the statistical records of accidents by location, type, movement pattern, and participant actions and impairments that are readily available to the City."

[60] San Francisco Department of Public Health, *Sustainable Communities Index and the Central Corridor Draft Plan*, April 11, 2013, http://default.sfplanning.org/Citywide/Central_Corridor/Central_Corridor_HDMT_Report_and_Response.pdf, accessed June 16, 2017.

The Plan's proposed street network changes were specifically designed to improve pedestrian and bicycle mobility and safety throughout the Plan Area to address the issues presented as the baseline conditions in the Draft EIR and to address concerns raised by commenters.

As presented on Draft EIR pp. IV.D-56 and IV.D-57, the Plan includes elements that would address many existing pedestrian impediments described above through implementing changes to the vehicle, pedestrian, and bicycle networks consistent with the goals of Vision Zero and meeting the standards in the *Better Streets Plan*, including, where possible, sidewalk widening, corner sidewalk extensions, pedestrian signal timing upgrades, signalized midblock pedestrian crossings, and opening currently closed crosswalks. These measures would also accommodate forecasted increases in pedestrian volumes generated by the Plan. Implementation of these improvements would enhance pedestrian conditions in Central SoMa and reduce the potential for vehicle-pedestrian and bicycle-pedestrian conflicts, thereby reducing the potential for collisions. For example, corner sidewalk extensions would increase pedestrian visibility to drivers, thereby allowing drivers to begin braking farther in advance of the intersection to yield the right-of-way. Pedestrians would benefit from installation of up to 23 new signalized midblock crossings throughout the Central SoMa area. The provision of new crossings would enhance pedestrian circulation and safety as midblock crossings would substantially reduce the distance pedestrians would need to travel in order to cross the street. The presence of signalized crossings would also enhance safety, as they would reduce the propensity to jaywalk across the multi-lane streets in the Plan Area. Pedestrian crossing times would be similar to those at adjacent intersections, and would be timed to accommodate the expected walking speed of between 2.4 to 3.1 feet per second. These pedestrian facilities would meet the required design standards set forth by NACTO, FHWA, CA MUTCD, Americans with Disabilities Act Accessibility Guidelines, and the SF Vision Zero program to ensure that the designs serve the needs of the residents and workers in the Plan Area, especially for seniors and persons with disabilities.

The CEQA checklist defines a traffic hazard as a design feature, such as sharp turns or dangerous intersections, or incompatible uses. As discussed in Draft EIR Impact TR-2, p. IV.D-43, implementation of the Central SoMa Plan would not introduce any unusual design features that would result in traffic hazards. However, the pedestrian impact analysis in Draft EIR Impact TR-4, pp. IV.D-56 through IV.D-65, included a pedestrian safety hazards assessment that considered the impact of increased pedestrian, vehicle, and bicycle travel, and potential increase in conflicts between the modes. The assessment described how the street network changes would address existing deficiencies in the network, accommodate increase in travel by all modes, and enhance pedestrian safety, and would not result in new hazards to pedestrians.

Under CEQA, the Plan would only result in a significant impact related to safety hazards if it would create new hazards or substantially exacerbate existing hazards. Contrary to commenter Drury's statement that "the DEIR is flat wrong in concluding that increased potential for conflict does not represent a hazard," an increase in traffic volumes does not represent an exacerbated existing or new hazard. Existing or new pedestrians would be exposed to existing hazards and conflict points, rather than new hazards and conflict points created by the Plan. In fact, as discussed on Draft EIR p. IV.D-56, the Plan would generally reduce pedestrian safety hazards by ensuring that any street network changes, when designed, would be reviewed by SFMTA's Transportation Advisory Staff Committee (TASC), including the San Francisco Fire Department along with other City agencies. This robust design process ensures streetscape elements or development projects do not introduce hazards and are consistent with these best practice design standards. Therefore, the Draft EIR is reasonable when it makes the conclusion that overall implementation of the Plan's street network changes would reduce safety hazards

for pedestrians within Central SoMa by providing a combination of improvements aimed at accommodating increases in pedestrian volumes and reducing the potential for collisions (e.g., providing new signals and midblock crossings, reducing the number of mixed-flow travel lanes and reducing vehicle travel speeds, new and improved crosswalks, etc.). The commenter claims that the Draft EIR's conclusion is unreasonable, but offers no evidence that demonstrates that the proven transportation engineering measures that would be implemented, and that have been nationally recognized as effective in building safe and sustainable streets, would not address existing hazards and would minimize future conflicts with implementation of the Plan.

The commenter claims that no quantitative analysis of conflict incidence without and with development under the Plan, and without and with the street network changes was conducted. However, the commenter provides no evidence that such an analysis is required under CEQA. Forecasts of future conflict incidences on an area wide Plan level that take into account countermeasures proposed for the transportation network are not possible to develop because no site-specific analysis has been conducted, given the programmatic nature of the Draft EIR analysis. The traffic engineering analysis requested by the commenter is appropriate for each specific street improvement, which would be undertaken by SFTMA and, as stated above, each improvement would be reviewed TASC. Therefore, the lack of such an analysis does not render the transportation impact analysis as inadequate. As noted above, the planning process involved in developing the Central SoMa Plan street network changes analyzed in the Draft EIR did consider available collision data, as well as additional analyses of pedestrian, bicycle, and vehicle circulation in the Plan Area. Thus, based on the above, the Draft EIR presents a comprehensive qualitative assessment of the Plan's effects on safety and right-of-way issues, potential worsening of existing, or creation of new, safety hazards, and conflicts with bicycles, transit, and vehicles.

Pedestrian and Vehicle Volumes

The fact that development under the Plan would result in a substantial increase in pedestrians, bicyclists, and vehicle trips in Central SoMa is not in dispute. As noted on Draft EIR pp. IV.D-32 through IV.D-35, the travel demand associated with the Plan's projected growth in residential units and jobs, as well as changes in travel patterns associated with the Plan's proposed street network changes, were estimated based on output from SF-CHAMP model. The SF-CHAMP model is an activity-based travel demand model that has been validated as consistent with FHWA guidelines to represent existing and future transportation conditions in San Francisco. The future transportation conditions include overall citywide growth and other reasonably foreseeable future development and transportation projects within Central SoMa and the vicinity. As presented in the "Overview" section of Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, the detailed description of cumulative development projects includes Piers 70–72, and other projects that were identified as missing by commenters. As addressed in Response TR-4, p. RTC-143, the automobile and pedestrian trips presented in the Draft EIR reflect the outputs of this validated model that reflects existing and future conditions, and there are not "undisclosed increases in traffic congestion" that could induce behavior that results in more collisions. The future traffic congestion is adequately presented in the Draft EIR, and there is no data supporting the claim of the commenter that congestion directly increases the likelihood of behaviors that results in higher collision rates. Therefore, the Draft EIR does not underreport the number of automobile or pedestrian trips and does not underreport potential incidents of pedestrian injuries.

Location-Specific Comments

The below responses relate to specific locations cited by commenters.

O-SFBC.1

The San Francisco Bicycle Coalition's comment regarding the need to provide bicycle facilities implemented at a high level of quality to reduce conflicts between bicyclists, pedestrians, and vehicles, and to enhance bicyclist safety, is noted. The Central SoMa Plan would provide protected bicycle lanes on Folsom, Third, and Fourth streets and would upgrade the existing bicycle lanes on Howard Street. The bicycle facilities would be designed in line with NACTO, California MUTCD, and FHWA recommendations and standards along all of the proposed corridors, the Plan would require that any street network changes, when designed, would be reviewed by SFMTA's TASC. This robust design process ensures streetscape elements or development projects do not introduce hazards for bicyclists and are consistent with these best practice design standards and the SF Vision Zero program.

As noted by the commenter, the Draft EIR acknowledged that development under the Plan could increase the potential for vehicular-bicycle and pedestrian-bicycle conflicts by exposing additional people to existing transportation conflicts and hazards. Under CEQA, the Plan would only result in a significant impact related to safety hazards if it would create new hazards or substantially exacerbate existing hazards. This additional exposure of new transportation system users to existing hazards would not be considered creation of a new hazard, and would not adversely affect bicycle facilities in the area. Furthermore, by physically separating bicyclists from vehicle traffic, the proposed protected bicycle lanes would offer a higher level of security than bicycle lanes, and impacts on bicycle facilities and circulation would be less than significant.

I-Hestor-1.4

As described on Draft EIR p. IV.D-56, Vision Zero SF is a road safety policy focused on eliminating traffic deaths in San Francisco by 2024. SFMTA, in collaboration with other City agencies, prioritized over 24 street engineering projects and improvements on high-injury corridors at more than 170 locations (identified through the WalkFirst pedestrian safety planning process) and bicycle-related safety improvement projects. A number of Vision Zero projects have already been implemented within the Central SoMa transportation study area and include improvements such as new traffic signals, leading pedestrian intervals, continental crosswalks, corner sidewalk extensions, turn restrictions, and audible/accessible pedestrian signals. The Central SoMa Plan street network changes are consistent with the types of improvements implemented under Vision Zero to enhance pedestrian and bicycle safety. Therefore, the enhancements to pedestrian circulation and safety as a result of the Central SoMa Plan street network changes would meet the goals of Vision Zero.

In the vicinity of the Caltrain station and nearby office and residential areas, the Plan proposes wider sidewalks and sidewalk extensions on streets crossing Fourth Street between Brannan and Mission streets and wider sidewalks on Fourth and Third streets between Folsom and Market streets. These sidewalk widenings would be in addition to intersection improvements such as leading pedestrian intervals and continental crosswalks.

O-YBCBD.2

In response to the Yerba Buena Community Benefit District's question on the proposed re-opening of the crosswalk on the north side of Folsom Street at Third Street, this crosswalk would be signal controlled, with continental crosswalks, and include a leading pedestrian interval to ensure that the design increases the visibility between pedestrians and vehicles. The impact of the new crosswalk was assessed qualitatively based on the

street network changes on both Third Street and Folsom Street, and considering the planned changes to the onsite loading access to the Moscone South loading area.

O-YBCBD.4

In response to the Yerba Buena Community Benefit District's question about the proposed mid-block crossing on Howard between Fourth and Fifth streets, this signalized crossing is proposed to be located east of the loading docks and passenger-loading zone under the Howard/Folsom One-Way Option. Placing the signalized crossing upstream of the loading areas ensures that queues from the signal do not block the loading areas and minimize potential conflicts between modes. While the exact location of this crossing has not been determined, as part of detail design of the street, its location would be determined considering both truck and passenger loading facilities associated with the Moscone West Loading Dock Entrance/Exit and the Intercontinental Hotel Valet Entrance. The impact of the midblock crossing was assessed qualitatively based on the street network changes proposed for the Howard/Folsom One-Way and Howard/Folsom Two-Way options.

O-CSN-1.31

This comment raises concerns that, with implementation of the Plan, pedestrian volumes would increase by as much as six times existing volumes, or 600 percent, and specifically cited pedestrian volume growth at the intersection of Fourth/King in Draft EIR Table IV.D-12, Pedestrian Crosswalk Level of Service—Weekday Midday Peak Hour—Existing and Existing plus Plan Conditions, p. IV-D.58. All information in this table was reviewed, and at five of the ten study intersections (i.e., intersections of Fourth Street with Harrison, Bryant, Brannan, Townsend, and King streets), the existing midday peak hour pedestrian volumes were incorrectly recorded in the table. In response to the comment, as shown on the following page, corrections were made to Table IV.D-12 (deleted text is shown in ~~strikethrough~~; new text is <u>double-underlined</u>).

The corrected pedestrian volumes on Table IV.D-12 show that the number of pedestrians at intersections on Fourth Street south of Brannan Street is projected to approximately double (e.g., the pedestrian volumes on the west crosswalk at the intersection of Fourth/King would increase from 768 pedestrians under existing conditions to 1,669 pedestrians with development under the Plan and street network changes). The corrections to Table IV.D-12 do not change the pedestrian impact analysis presented in Draft EIR Impact TR-4, as the correct volumes were used in the analysis, nor do the corrections change the conclusions regarding CEQA impacts on pedestrians without or with implementation of the Plan.

The comment also states that increasing both pedestrians and vehicles in the transportation study area would increase pedestrian injuries, and the conclusion defies logic and is arbitrary and capricious. As discussed above, the pedestrian LOS analysis at crosswalks, sidewalks, and corners does not present a determination of whether a pedestrian safety hazard exists at the location but, rather, an indication of pedestrian density, which at higher densities could encourage risk-taking behavior. As discussed above, while implementation of the Plan would generate new pedestrian, bicycle, and vehicle trips that would be added to the transportation network, the greatest increase in pedestrians would be in areas that currently feature lower-scaled development and surface parking lots, and with lower pedestrian volumes (e.g., the Plan's southern areas, south of I-80 and west of Third Street). The Plan's street network changes include numerous elements that would not only accommodate the increase in pedestrians traveling on the sidewalks and through intersections, such as wider sidewalks and

TABLE IV.D-12 PEDESTRIAN CROSSWALK LEVEL OF SERVICE—WEEKDAY MIDDAY PEAK HOUR—EXISTING AND EXISTING PLUS PLAN CONDITIONS [REVISED]

Intersection and Crosswalk Locations	Existing			Existing plus Land Use Plan Only Alternative (see Section VI.F, Alternatives)			Existing plus Plan[c]		
	Pedestrians	sf/ped[a]	LOS[b]	Pedestrians	sf/ped	LOS	Pedestrians	sf/ped	LOS
Third/Mission									
North	971	28	C	1,056	25	C	1,063	42	B
South	1,068	23	D	1,162	21	D	1,169	36	C
East	1,121	30	C	1,219	27	C	**1,227**	**12**	**E**
West	921	42	B	1,002	39	C	1,008	**13**	**E**
Third/Howard									
North	653	49	B	710	29	C	715	>60	A
South	716	>60	A	779	36	C	784	>60	A
East	727	42	B	791	24	D	796	>60	A
West	686	49	B	746	28	C	751	16	D
Fourth/Mission									
North	1,171	25	C	1,274	23	D	1,281	42	B
South	1,391	21	D	1,513	19	D	1,522	35	C
East	1,792	27	C	1,949	24	C	**1,961**	**11**	**E**
West	1,645	29	C	1,789	26	C	**1,800**	**10**	**E**
Fourth/Howard									
North	669	>60	A	728	>60	A	732	>60	A
South	580	32	C	631	29	C	635	>60	A
East	1,070	>60	A	1,164	57	B	1,171	>60	A
West	619	24	C	673	22	D	677	26	C
Fourth/Folsom									
North	33	>60	A	42	>60	A	43	>60	A
South	247	53	B	314	41~~42~~	B	318	>60	A
East	390	38	C	496	29	C	502	34	C
West	296	>60	A	376	>60	A	381	>60	A
Fourth/Harrison									
North	167	>60	A	212	>60	A	215	>60	A
South and Ramp[d]	—	—	—	—	—	—	—	-	-
East	586~~161~~	>60	A	745	49	B	755	42	B
West	27~~8~~	>60	A	34	>60	A	35	>60	A
Fourth/Bryant									
North	21~~4~~	>60	A	27	>60	A	27	>60	A
South	195~~70~~	>60	A	248	50	B	251	>60	A
East	538~~152~~	41	B	684	32	C	693	25	C
West	24~~3~~	>60	A	31	>60	A	31	>60	A
Ramp	8~~2~~	>60	A	10	>60	A	10	>60	A
Fourth/Brannan									
North	222~~45~~	>60	A	483	56	B	485	>60	A
South	259~~68~~	>60	A	563	41	B	566	53	B
East	473~~116~~	>60	A	1,028	34	C	1,034	40	B
West	309~~112~~	54	B	672	24	D	676	28	C
Fourth/Townsend									
North	484~~153~~	>60	A	1,052	38	C	1,058	38	C
South	290~~88~~	>60	A	630	38	C	634	38	C
East	483~~113~~	>60	A	1,050	34	C	1,056	34	C
West	488~~166~~	22	D	**1,061**	**9**	**E**	**1,067**	**9**	**E**
Fourth/King									
North	300~~118~~	>60	A	652	44	B	656	44	B
South	448~~120~~	>60	A	974	32	C	980	32	C
East	743~~162~~	>60	A	1,615	33	C	1,625	33	C
West	768~~246~~	>60	A~~D~~	1,669	29	C	1,680	29	C

SOURCE: SF Planning Department, Fehr & Peers, 2016. Research, studies, and analysis for the Central SoMa Plan.

NOTES:

a. Square feet per pedestrian. Inputs into this metric include signal cycle length, pedestrian green time, crosswalk square footage, and pedestrian volumes. Changes to any of these inputs across the scenarios (e.g., change in signal cycle from 60 to 90 seconds) lead to changes in the metric value and the resulting LOS.

b. Crosswalks operating at LOS E or LOS F highlighted in **bold**. Shaded indicates significant project impact.

c. With Plan analysis assumes that crosswalks would be widened to width of adjacent sidewalks and signal control changes would also be implemented. Analysis assumes implementation of Howard/Folsom One-Way Option, although pedestrian conditions under the Howard/Folsom Two-Way Option would be similar.

d. At the intersection of Fourth/Harrison Street, pedestrian crossings across the south leg (i.e., crossing Fourth Street) or the I-80 westbound on-ramp are currently not permitted.

crosswalks, but would also address identified existing pedestrian safety concerns in Central SoMa by implementing safety improvements such as new traffic/pedestrian signals, leading pedestrian intervals, corner extensions, midblock crossings, and protected bicycle lanes. Furthermore, the street network changes that enhance the pedestrian, bicycle, and transit network would slow vehicles down, as well as reduce the vehicle capacity available for vehicular travel through Central SoMa. Thus, the Draft EIR correctly determines that implementation of the Plan would reduce traffic safety hazards for pedestrians by providing a combination of improvements aimed at accommodating increases in pedestrian volumes and reducing the potential for collisions; therefore, the Draft EIR conclusion that impacts related to pedestrian safety hazards would be less than significant is based on substantial evidence in the record as required by CEQA.

Other Comments

Other comments do not address the adequacy or accuracy of the Draft EIR but, instead, provide clarifications regarding leading pedestrian intervals at signalized intersection and request clarification whether pedestrian scrambles were studied as part of signal timing upgrades.

The Plan does not propose to provide new pedestrian scrambles (i.e., all-pedestrian signal phases) at signalized intersection. However, the Plan proposes adding leading pedestrian intervals[61] at all signalized intersections, as well as protected pedestrian and bicycle phases on streets with protected bicycle lanes such as on Third, Fourth, Folsom, and Howard streets. These measures would reduce the potential for conflicts between turning vehicles and pedestrians and bicyclists. In response to SFMTA's comment noting that leading pedestrian intervals should be listed among the upcoming improvements to the pedestrian network on Draft EIR p. IV.D-56, these are part of the pedestrian signal timing upgrades that are listed; therefore, additional edits are not required.

Comment TR-10: Loading Impacts

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

O-Freeman.1
O-YBCBD.3
O-YBCBD.6
O-YBCBD.7

"On behalf of Freeman Expositions Inc., which stages 80 percent of Moscone Center's events, the San Francisco Chamber of Commerce, San Francisco Travel, Hotel Council of San Francisco as well as a coalition of organized labor organizations who work at Moscone, we wish to share our comments on the Central SoMa Plan Draft Environmental Impact Report (EIR) issued in December 2016.

"Moscone Center is the principal venue for San Francisco's multi-billion dollar convention industry. During the 2015-16 fiscal year, thousands of locally employed and well-compensated tradespeople constructed, staged and

[61] Leading pedestrian intervals typically provide pedestrians a 3- to 5-second head start when entering an intersection with a corresponding green signal in the same direction of travel. They also enhance the visibility of pedestrians in the intersection and reinforce their right-of-way over turning vehicles.

dismantled 114 different events. We are concerned about potential changes to road traffic controls near Moscone Center and how they will impact these workers and convention operations.

"Our 24-hour/7-day a week convention operations depend on Moscone's trucking access as it exists –specifically keeping Howard and Folsom Streets between 3rd and 4th streets one way. This traffic configuration was thoroughly vetted in stakeholder meetings with neighborhood and business leaders many years ago to accommodate the large trucks and shuttle buses that service the Moscone schedule of events. This solution has worked well given our dense urban environment.

"As part of the expansion, the new Moscone Center South Loading Dock entrance on 3rd Street has shifted south some 75 feet closer to the Folsom Street corner. Large trucks making the turn from Folsom Street onto 3rd Street and into the loading dock entrance will require a wider swing area, often from the second or middle lane of Folsom Street.

"It is critical that the Folsom Street north curb lane between 3rd and 4th Streets remains unchanged and available for this purpose." *(Bill Kuehnle, Freeman Expositions Inc., June 27, 2017 [O-Freeman.1])*

"The north curb lane of Folsom Street between 3rd and 4th streets is important to operations at Moscone Center. It is often utilized for queuing freight trucks and/or shuttle buses. In addition, the new Moscone Center South Loading Dock entrance on 3rd Street has shifted south, closer to the Folsom Street corner. Large trucks making the turn from Folsom Street onto 3rd Street and into the loading dock entrance will require a wider swing, often from the 2nd or middle lane of Folsom Street. It's critical that the north curb lane of Folsom Street between 3rd and 4th streets remains unchanged and available for this purpose." *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.3])*

"While we are generally supportive of more dedicated bike and/or MUNI lanes, we are concerned about potential changes near Moscone Center that will impact their business. Making it more difficult to move people and freight efficiently could result in the loss of business and millions in revenue to the City." *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.6])*

"The Central SoMa Plan Area includes freeway on and off ramps that increase vehicle congestion in the area. With the expected increase of people living and working in the area, deliveries will increase. To reduce conflicts, what mitigation efforts can be employed when on-street and off-street loading areas aren't sufficient?" *(Scott Rowitz, Yerba Buena Community Benefit District, Letter, February 13, 2017 [O-YBCBD.7])*

Response TR-10

The comments raise concerns that the proposed street network changes, including implementation of transit-only lanes, bicycle lanes, conversion from one-way to two-way operations on Howard and Folsom streets, and removal of on-street curb parking, would impact existing building loading activities in the area, specifically referring to the Moscone Convention Center. The comments also state that Folsom Street should remain one-

way eastbound and that the north curb of Folsom Street between Third and Fourth streets should remain unchanged to accommodate Moscone Center loading activities and access.

Impacts of development under the Plan on loading, including implementation of the street network changes, are presented in Draft EIR Impact TR-6, pp. IV.D-68 through IV.D-75. The analysis found that implementation of the Plan would result in an inadequate supply of on-street commercial loading spaces that in some locations would disrupt transit, bicycle, and vehicle circulation, and potentially cause hazardous conditions and, therefore, significant loading impacts. As required by CEQA, mitigation measures were identified (Mitigation Measures M-TR-6a, Driveway and Loading Operations Plan, p. IV.D-73, and M-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones, p. IV.D-74). The concerns raised in the comments regarding use of existing on-street parking for commercial vehicle loading operations are correct and noted. As described in the Draft EIR, removal of on-street loading spaces would require existing delivery and service vehicles using these spaces to seek alternate locations, and would result in fewer on-street spaces being available for future development. Emergency vehicles would not be affected by removal of curb parking or loading spaces, as suggested in a comment, as emergency vehicles responding to incidents do not park at the curb, but instead stop within the roadway right-of-way.

With respect to the proposed street network changes as a whole, they are meant to be flexible and responsive to the needs of the areas in which they are proposed. This means that details including vehicle, transit, protected bicycle lanes, and sidewalk widths, location of passenger and commercial loading, driveway curb cuts, and on-street parking regulations would be refined and confirmed at the time that detailed design documents for construction are prepared, and would be designed to meet City, NACTO, California MUTCD, and FHWA recommendations and standards, as appropriate ("design process"). Further, this design process also includes the appropriate City agencies weighing the potential effects street network changes on the existing built environment (including existing pedestrian and vehicular access to land uses, loading areas, or parking lots/garages) against the land use and transportation goals of the City and the Central SoMa Plan.

The discussion in Impact TR-6 states that the failure to provide an adequate supply of off-street commercial loading spaces for new projects, and the removal of commercial loading spaces currently used by existing buildings in the area, would result in significant loading impacts. Therefore, the Draft EIR identified Mitigation Measures M-TR-6a and M-TR-6b to accommodate loading needs and to reduce the potential for conflicts between loading operations and transit, bicyclists, pedestrians, and other vehicles.

Mitigation Measure M-TR-6b would require SFMTA to develop a curb management strategy for Central SoMa or within proximity of the street network changes that articulates curb use priorities for different types of streets, while safely managing loading demands. This measure would reduce the potential for disruption of existing loading activities, including disruption of business operations. However, because the potential locations for replacement of on-street commercial loading spaces where circulation changes are proposed are limited, it is unlikely that a sufficient amount of spaces could be provided to offset the net loss in supply. Therefore, even with implementation of this mitigation measure, loading impacts would remain significant and unavoidable with mitigation.

The expansion of the Moscone Convention Center and revised configuration of the access and loading activities were assessed as part of the Moscone Center EIR. Mitigation Measure M-TR-6a is part of the Moscone Center Mitigation Monitoring and Reporting Program (MMRP) that will require Moscone Center to develop and

implement a transportation plan, including for truck operations, tailored to the size, duration, and characteristics of the individual event. In particular, inbound trucks to the onsite loading area will not be permitted to queue along the west curb of Third Street while waiting for an available loading dock. As noted in the comment, the Moscone Center expansion project will relocate the truck entrance to the on-site loading area about 190 feet to the south, closer to Folsom Street. Under both the Howard/Folsom One-Way Option and the Howard/Folsom Two-Way Option, loading access to the Moscone Convention Center would be maintained. Under the Howard/Folsom One-Way Option, the proposed protected bicycle lanes on the north side of Folsom Street would result in large trucks making a wider turn from Folsom Street onto Third Street, but would be able to make the turn from the northern-most lane (and not the second or middle lane as stated in the comment). Because the block between Third and Fourth streets is more than 600 feet in length, trucks traveling turning left from Folsom Street eastbound onto Third Street northbound would have sufficient distance to access the entry to the two-lane loading access area. Under the Howard/Folsom Two-Way Option, trucks would make a left turn from Folsom Street eastbound onto Third Street northbound from a two-way street, and would be required to travel to the west side of the street to access the loading area. Trucks would also be expected to travel northbound on Third Street south of Folsom Street, which would provide easier access for larger trucks to the loading area entrance on Third Street.

Comment TR-11: Parking Impacts

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

O-CSN-1.18

"**5. The Plan will have Significant Parking Impacts that are Not Disclosed or Mitigated in the DEIR.**

"Parking impacts are significant under CEQA. In *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1051 (2013), the court rejected the City of San Francisco's position that parking impacts are not significant impacts under CEQA, holding, 'Therefore, as a general rule, we believe CEQA considers a project's impact on parking of vehicles to be a physical impact that could constitute a significant effect on the environment.' 'To the extent the lack of parking affects humans, that factor may be considered in determining whether the project's effect on parking is significant under CEQA.' *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1053.

"The Plan will have significant parking impacts. The DEIR admits that the Plan will create a shortfall of parking of 15,500 parking spaces. (DEIR, p. IV.D-77). The DEIR states:

> there could be a shortfall in parking spaces provided relative to the projected demand (i.e., a shortfall of about 15,550 parking spaces). This shortfall could be greater if development projects provide less than the maximum permitted parking spaces. It is anticipated that a portion of the shortfall would be accommodated on-street, particularly the overnight residential parking demand, and a portion of the shortfall could potentially be accommodated off-street in public parking facilities serving the daytime non-residential parking demand (e.g., the SFMTA Fifth & Mission/Yerba Buena Garage). As a result of the parking shortfall, some drivers may circle around the neighborhood in search of parking, which would increase traffic congestion on the local street network.

"Id. Despite these statement, the DEIR concludes that parking impacts would be less than significant. (DEIR, p. IV.D-78). This conclusion simply does not logically follow from the DEIR's own analysis. As such it is arbitrary and capricious." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.18])*

Response TR-11

The commenter disagrees with the impact determination in the Draft EIR for parking and states that the Draft EIR determination that the Plan's less-than-significant parking impact was arbitrary and capricious.

The Planning Department has found for many years that, in the transit-rich urban context of San Francisco, parking loss or deficit in and of itself does not result in direct physical changes to the environment. In other words, the social inconvenience of a person searching in their vehicle for an available parking space is not an environmental impact under the purview of CEQA; instead, the secondary effect of this search in relation to other topics (e.g., air quality, noise) is an environmental impact. This approach was affirmed in a published court decision, *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656. The commenter references a case from San Diego to support the position that parking impacts are significant under CEQA. However, in that published court decision, *Taxpayers for Accountable School Board Spending v. San Diego Unified School District* (2013) 215 Cal.App.4th 1013, the court distinguished the facts of *San Franciscans* from those of *Taxpayers*, holding that the circumstances addressed by the *San Franciscans* case were special, given San Francisco's urban context and adopted city policies, and may not apply elsewhere (e.g., San Diego). Furthermore, the court found that in the San Diego case, the lack of parking could potentially lead to environmental impacts, given the specific circumstances of that case, in which a "bedroom community" would be impacted and the defendant district did not provide adequate information about existing parking conditions.

The assessment of impacts of the Plan on parking is presented on Draft EIR pp. IV.D-75 through IV.D-79, and parking impacts, with respect to the significance criteria presented on Draft EIR p. IV.D-24, were determined to be less than significant. The parking impact assessment included an estimation of the parking demand that would be generated by the new uses based on the methodology presented in the SF Guidelines. The SF Guidelines reflects a free, unconstrained supply of parking at development sites, which overestimates the parking demand. In other words, the parking demand analysis methodology assumes that all drivers who want parking places will locate them in proximity to where they are desired. In reality, at many locations in San Francisco, less parking is available than would be required to meet peak demand and/or the parking that is available is priced such that not all motorists will elect to use it. Therefore, actual parking demand may be less than predicted because some people may opt not to drive given the constraints on parking availability and pricing. The potential parking supply associated with development under the Plan was based on Planning Code requirements (i.e., the maximum permitted amount of parking that could be provided).

A parking deficit itself is not a CEQA impact. Rather, the Draft EIR analyzes whether that deficit would result in potentially hazardous conditions. In evaluating whether a parking deficit is substantial and, thus, could result in hazardous conditions or delays, the following was considered:

- If the parking demand resulting from elimination of on-street spaces could not be met either with other on-street spaces or existing off-street parking facilities within 0.5 mile of the Plan Area; and
- Whether the Plan Area is adequately served by other modes of transportation (i.e., Muni, regional transit providers, taxis, TNC vehicles [e.g., Uber, Lyft, etc.], and bicycle and pedestrian facilities).

The analysis also considered whether the potential loss of parking, or shortfall in parking, is temporary or intermittent. Overall, the parking impact as a result of implementation of the Plan was considered to be a less-than-significant impact because both increased parking demand and parking removal would, in most cases, be spread out over multiple streets; other on-street or off-street parking would be available; the streets within Central SoMa are well served by public transit and other modes; the proposed street network changes would further improve transit, bicyclist, and pedestrian conditions; and the parking loss would not be expected to create hazardous conditions such as impairing visibility on narrow streets (e.g., the midblock alleys), blocking sidewalks or crosswalks, or blocking access to fire hydrants.

Therefore, contrary to the commenter's assertion, the Draft EIR's determination that the parking deficit under the Plan would not result in a significant impact on the physical environment is supported by substantial evidence in the record and no changes are required to the Draft EIR.

Comment TR-12: Emergency Vehicle Access Impacts

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

O-CSN-1.17
O-CSN-1.65

"**4. The Plan Will Have Significant Adverse Impacts to Emergency Vehicle Access.**

"Mr. Smith concludes that the Plan will have significant adverse impacts to emergency vehicle access that are not disclosed or analyzed in the DEIR. (Smith Comment, p. 7). The DEIR asserts without foundation that although traffic congestion would occur, that the California Vehicle Code requires that other motor vehicles get out of the way of emergency vehicles and because emergency vehicles primarily use arterial streets where there is purportedly room to get out of the way of emergency vehicles, despite the fact that the DEIR admits there would be increased traffic congestion with the Project, it asserts without sound foundation that there would be no significant impact on emergency vehicle traffic. This assertion is inconsistent with the information in the DEIR's traffic impact analysis at DEIR pages IV.D-41 through 43 which indicate that:

- With the Project, 10 of 11 freeway ramps serving the Project area would be at 'breakdown levels' during the AM and/or PM peak periods. Breakdown levels on the on ramps causes extensive queuing on City surface streets that would impair emergency vehicle traffic even on arterials because other drivers may not have the room to comply with the Vehicle Code and get out of the way quickly. 'Breakdown levels' on the off ramps involves queues onto the freeway mainlines. The confined ramps provide motorists little opportunity to comply with the vehicle code and get out of the way and motorists at the critical ramp exit points will not even know that an emergency vehicle is coming until it has slowly worked its way toward the head of the exit queue.
- With the Project, up to 21 of the 36 study area intersections that were analyzed for the AM peak hour and up to 39 of the 80 study area intersections that were analyzed for the PM peak hour are reported to experience highly deficient delay conditions. At these traffic delay levels that imply significant queuing, even on arterial width roadways, traffic is likely to be too congested to comply with the Vehicle Code mandate to get out of the way of emergency vehicles.

"The DEIR's unsubstantiated and conclusory statements about emergency vehicle access impacts of the Project must be revised and made consistent with findings made elsewhere in the DEIR." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.17])*

"**The DEIR's Emergency Vehicle Impact Analysis Is Unreasonable In the Face of Facts Disclosed Elsewhere in the DEIR**

"The DEIR asserts without foundation that although traffic congestion would occur, that the California Vehicle Code requires that other motor vehicles get out of the way of emergency vehicles and because emergency vehicles primarily use arterial streets where there is purportedly room to get out of the way of emergency vehicles, despite the fact that the DEIR admits there would be increased traffic congestion with the Project, it asserts without sound foundation that there would be no significant impact on emergency vehicle traffic. This assertion is inconsistent with the information in the DEIR's traffic impact analysis at DEIR pages IV.D-41 through 43 which indicate that:

- With the Project, 10 of 11 freeway ramps serving the Project area would be at 'breakdown levels' during the AM and/or PM peak periods. Breakdown levels on the on ramps causes extensive queuing on City surface streets that would impair emergency vehicle traffic even on arterials because other drivers may not have the room to comply with the Vehicle Code and get out of the way quickly. 'Breakdown levels' on the off ramps involves queues onto the freeway mainlines. The confined ramps provide motorists little opportunity to comply with the vehicle code and get out of the way and motorists at the critical ramp exit points will not even know that an emergency vehicle is coming until it has slowly worked its way toward the head of the exit queue.
- With the Project, up to 21 of the 36 study area intersections that were analyzed for the AM peak hour and up to 39 of the 80 study area intersections that were analyzed for the PM peak hour are reported to experience highly deficient delay conditions. At these traffic delay levels that imply significant queuing, even on arterial width roadways, traffic is likely to be too congested to comply with the Vehicle Code mandate to get out of the way of emergency vehicles.

"The DEIR's unsubstantiated and conclusory statements about emergency vehicle access impacts of the Project must be revised and made consistent with findings made elsewhere in the DEIR." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.65])*

Response TR-12

The comments state that the Draft EIR's conclusions regarding impacts to emergency vehicle access are unsubstantiated and conclusory and contradict information presented elsewhere in the Draft EIR.

Contrary to these comments, the Draft EIR provides a thorough and complete assessment of the effects of the proposed street network changes and of subsequent development under the Plan on emergency vehicle access and response. Emergency vehicle access impacts are presented on Draft EIR pp. IV.D-79 through IV.D-81. As stated in the Draft EIR, increased congestion associated with an increase in vehicles and a reduction in travel lanes was considered in the analysis of emergency vehicle access impacts. The discussion of emergency vehicle access impacts in the Draft EIR acknowledges that while California law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes, emergency vehicles are

equipped with flashing lights and sirens to facilitate movement through congested streets and have the right-of-way, and emergency personnel are typically familiar with the best response routes, it is likely that the increased number of vehicles in the remaining travel lanes and increased levels of traffic congestion would occasionally impede emergency vehicle access in the Plan Area during periods of peak traffic volumes. Therefore, the Draft EIR discloses that proposed Plan street network changes, in combination with increases in vehicle traffic generated by development under the Plan, would result in a significant impact on emergency vehicle access.

Accordingly, the Draft EIR identifies Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, p. IV.D-81, to reduce the impact on emergency vehicle access to a less-than-significant level. Mitigation Measure M-TR-8 would ensure that SFMTA, to the degree feasible, designs street network projects to include features that create potential opportunities for cars to clear travel lanes for emergency vehicles; examples of which include curbside loading zones, customized signal timing, or other approaches developed through ongoing consultation with the San Francisco Fire Department.

The comment also states that with implementation of the Plan, freeway ramp operations reflecting breakdown conditions in the ramp influence area would impair emergency vehicle access on local arterials because other drivers may not have the room to comply with the vehicle code and get out of the way quickly. The analysis of freeway ramp conditions was assessed for freeway merge (i.e., on-ramp) and diverge (i.e., off-ramp) locations and reflect the impact of ramp operations on the freeway mainline conditions (i.e., the freeway mainline upstream of an off-ramp, and the area downstream of the merge of the on-ramp and freeway mainline). As noted on Draft EIR p. IV.D-43, the number of ramp merge and diverge locations that would operate with a vehicle density or service volumes reflecting breakdown conditions in the ramp influence area would increase from eight of the 11 freeway ramps, to 10 of the 11 freeway ramps during the a.m. and/or p.m. peak hours. Thus, during peak periods, many of the nearby I-80 and I-280 ramps currently operate at capacity during peak periods, and implementation of the Plan would increase the number of ramps operating at breakdown conditions by two ramps, specifically the I-80 eastbound on-ramp at Sterling Street at Bryant Street, and the I-80 westbound off-ramp at Fifth Street at Harrison Street. During the p.m. peak hour, the intersections in the vicinity of the I-80 eastbound on-ramp at Sterling Street currently operate at queued conditions; therefore, the minimal additional vehicles generated by the Plan would not be substantially different from the existing conditions that emergency vehicles and drivers experience at this location.

The Central SoMa Plan transportation study assessed the potential for traffic generated by the Plan to affect freeway mainline operations. While additional traffic generated by the Plan has the potential to increase hazards on the freeway mainline, should off-ramp queues create a speed differential between the mainline travel lanes and the off-ramp, it would be unlikely that the magnitude of this speed differential would result in hazards. With respect to the I-80 westbound off-ramp at Fifth Street and Harrison Street, the off-ramp is approximately 1,600 feet in length, and two of the five freeway mainline lanes directly serve the off-ramp (i.e., a two-lane exit-only lane drop). Emergency vehicles traveling on the mainline would be equipped with flashing lights and sirens to alert drivers of their presence and to facilitate movement of the emergency vehicle on the freeway mainline and ramps.

In summary, San Francisco streets regularly experience high levels of congestion in the downtown core and on the freeway structure and ramps, and yet emergency vehicle access occurs during these periods. The additional vehicles generated by development under the Plan would result in increased congestion and vehicle delays, as

noted in the comment. However, the Plan would not fundamentally change how emergency vehicles travel through streets in SoMa as they would not incur substantial additional delays while responding to incidents, as emergency vehicles have right-of-way and do not have to stop at traffic signals.

Thus, contrary to the commenter's assertions, the Draft EIR is internally consistent and fully discloses the potential effects of the proposed street network changes and of subsequent development under the Plan on emergency vehicle access. The determination that these impacts would be less than significant with the implementation of Mitigation Measure M-TR-8 is supported by substantial evidence in the record and no changes to the Draft EIR are required.

Comment TR-13: Mitigation and Improvement Measures

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

A-SFMTA.2
A-SFMTA.3
A-SFMTA.5
O-CSN-1.34
O-CSPO.4
O-CSPO.5

"Pages S-17- S-19. Table S-1 (Top of Page). It appears that there are minor typos. Mitigation Measures M-TR-3a through M-TR-3c (right-hand column of the table) should not be bulleted. Please check to see that the bullets line up with the appropriate measures." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.2])*

"Page S-20. Improvement Measure I-TR-5b: Cycle Track Post-Implementation Surveys. It should be noted that it is not yet certain that cycletracks will be installed on all of the streets listed in the text." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.3])*

"Page IV.D-54. Muni Storage and Maintenance. Staff recommend that the first part of this paragraph be revised as follows:

> 'To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall **explore alternatives to** provide **improved** maintenance and storage facilities. In 2013, the SFMTA prepared a *Real Estate and Facilities Vision for the 21st Century* report. **In 2014, an *Addendum to the Real Estate and Facilities Vision for the 21st Century report* was prepared**.'

"In addition, the SFMTA is preparing an update to the Vision Report in 2017." *(Charles Rivasplata, San Francisco Municipal Transportation Agency, Letter, February 10, 2017 [A-SFMTA.5])*

"**K. The DEIR Fails to Adequately Mitigate Significant Adverse Impacts to Public Transit.**

"The DEIR admits that:

> Transportation and Circulation, growth pursuant to the Plan would result in Muni ridership that would exceed Muni's capacity utilization standard on one corridor crossing the southeast screenline, as well as on two corridors crossing Plan-specific cordon lines. As described in Chapter II, Project Description, the Plan would also result in transit delay on a number of Muni lines, due to increased congestion. (DEIR, p. III-9).

"The DEIR admits that the Plan would have significant and unavoidable impacts to public transit, and that 'substantial increase in transit demand that would not be accommodated by local transit capacity.' (DEIR, p. IV.D-43).

"Despite admitting this impact, the DEIR improperly defers mitigation. The DEIR states that 'during the design phase, the SFMTA shall review each street network project … and incorporate feasible street network design modifications.' (DEIR, p. IV.D- 53). The DEIR also states that the City will 'establish fee-based sources of revenue such as parking benefit district,' and shall 'establish a congestion-charge scheme for downtown San Francisco.' (Id.) None of these mitigation measures are defined in the least. There is no way for the public to review the adequacy of these measures. They are classic deferred mitigation that is prohibited under CEQA. (See section above on deferred mitigation).

"In addition, the 'fee-based' mitigation has been held inadequate under CEQA, unless the specific source of the fee is identified and the specific measures to be funded are set forth in the EIR. The DEIR fails both of these tests. Mitigation fees are not adequate mitigation unless the lead agency can show that the fees will fund a specific mitigation plan that will actually be implemented in its entirety. *Napa Citizens for Honest Gov. v. Bd. Of Supervisors* (2001) 91 Cal.App.4th 342 (no evidence that impacts will be mitigated simply by paying a fee); *Anderson First Coal. v. City of Anderson* (2005) 130 Cal.App.4th 1173 (traffic mitigation fee is inadequate because it does not ensure that mitigation measure will actually be implemented); *Kings Co. Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692. But see, *Save Our Peninsula Comm v. Monterey Co.* (2001) 87 Cal.App.4th 99 (mitigation fee allowed when evidence in the record demonstrates that the fee will fund a specific mitigation plan that will actually be implemented in its entirety). *California Native Plant Society v. County of El Dorado et al.* (2009) 170 Cal. App. 4th 1026, held that the fee program had to have gone through CEQA review for an agency to say that the payment of the fee alone is adequate CEQA mitigation.

"The DEIR fails to describe any specific mitigation measures to reduce the acknowledged impact to public transit, and fails to specify what measures will be funded. A revised DEIR is required to provide specific mitigation measures to reduce the Plan's transit impacts." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.34])*

"**Page:** **Comment:**

S-17 Mitigation Measure M-TR-3a. There is a formatting error in this table. The M-TR-3(b)-(c) elements have been indented as bullet points." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Letter, February 13, 2017 [O-CSPO.4])*

"**Page:** **Comment:**

S-25 Mitigation Measure M-TR-9. This measure would require project sponsors to develop and, upon review and approval of the SFMTA and Public Works, implement a Construction Management Plan. If construction is proposed to overlap with nearby projects as to result in transportation-related impacts, the sponsor is also required to consult with various City departments to develop a Coordinated Construction Management Plan. These documents would include Restricted Construction Truck Access Hours, limiting truck movements to between 9 a.m. and 4 p.m., or other times if approved by SFMTA. The baseline hours provided may fall within times of heavy traffic or congestion at many sites within the Plan area, and would preclude evening or nighttime construction activities. This measure should be revised to provide site-specific flexibility and exceptions for exigent circumstances, or require limitation of construction truck access during peak commute hours, rather than identifying a pre-determined daytime window." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Letter, February 13, 2017 [O-CSPO.5])*

Response TR-13

One comment states that elements of the transit Mitigation Measure M-TR-3a, Transit Enhancements, p. IV.D-53, represent improper deferral of mitigation. Other comments request correction or clarification to the formatting or text of the mitigation measures.

The comment claiming deferral of mitigation states that the "Enhanced Transit Funding" component of Mitigation Measure M-TR-3a allegedly constitutes improper deferral of mitigation because components of the measures, specifically establishing a fee-based source of revenue and establishing a congestion-charging scheme for downtown San Francisco, are not fully defined, and the Draft EIR lacks evidence that they will be effective or will be implemented.

Central SoMa Plan Implementation Strategy Part IIB presents the public benefits and sources of funding that would incur with implementation of the Plan.[62] Pursuant to the implementation strategy, the Central SoMa Plan is expected to generate substantial public benefits derived through various mechanisms, including direct provision of benefits, one-time impact fees, and ongoing taxation. Of the approximately $2.05 billion in public benefits funding derived from the various sources of funding, about $630 million would be allocated to transportation, including $500 million to transit and $130 million to complete streets. These funds would be available to implement the physical street network changes included in the Plan, such as sidewalk widening, travel lane changes, protected bicycle lanes, new signals, and operational changes to transit, such as reroutes and increased service to accommodate the increased transit ridership as Central SoMa builds out. Therefore, it is anticipated that funding would be available to fund the identified mitigation measures such as boarding enhancements for riders, upgrades of transit-only lanes, and crosswalk widenings, all of which would be within the scope of work already proposed to be funded through the public benefits revenue mechanisms included in the published Plan.

As noted by the commenter, the Draft EIR determines that development under the Plan would result in significant impacts related to transit capacity and transit delay. Accordingly, the Draft EIR identifies three (previously four) mitigation measures addressing these impacts: Mitigation Measures M-TR-3a, Transit

[62] San Francisco Planning Department, *Central SoMa Plan*, Part IIB, Central SoMa Implementation Strategy, Public Benefits Package, August 2016, pp. 134–135.

Enhancements, p. IV.D-53; M-TR-3b, Boarding Improvements, p. IV.D-54; and M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets, p. IV.D-54.[63] Implementation of these measures would reduce the capacity utilization and travel time impacts of the Plan to less-than-significant levels. The "Enhanced Transit Funding" component of Mitigation Measure M-TR-3a identifies potential additional sources of funding, beyond those currently identified in the *Central SoMa Implementation Strategy Public Benefits Package*, that the City could pursue to supplement available funding for transit operating and capital funding. These sources include congestion-charge scheme for San Francisco and grant funding from regional, state, and federal sources for specific capital improvements. However, because it is not known whether the Transportation Authority would provide additional service on the impacted routes to fully mitigate project impacts, the Draft EIR determines that the impacts of the Plan on transit would be significant and unavoidable with mitigation.

The commenter further states that the reference to the design phase of the street network changes and SFMTA review in the "Transit Corridor Improvement Review" component of Mitigation Measure M-TR-3a allegedly constitutes improper deferral of mitigation. In responding to this comment, it is important to note that the commenter quotes only a few phrases extracted from the page-long Mitigation Measure M-TR-3a. Contrary to the commenter's assertion that "none of these mitigation measures are defined in the least," the measure defines specific performance standards, including:

(1) Maintaining accessible transit service;

(2) Enhancing transit service times; and

(3) Offsetting transit delay; and a menu of feasible actions capable of achieving these standards, including but not limited to:

   a) Transit-only lanes;

   b) Transit signal priority;

   c) Queue jumps;

   d) Stop consolidation;

   e) Limited or express service;

   f) Corner or sidewalk bulbs; and

   g) Transit boarding islands.

This mitigation approach—defining performance standards and identifying feasible methods of achieving them—is a common and acceptable practice under CEQA, and is particularly suitable for program-level EIRs like the Central SoMa Plan EIR, where detailed information required to complete site- and project-specific analysis is unavailable during the CEQA environmental review process. Accordingly, the proposed street network changes analyzed in the Draft EIR were designed to a level of detail appropriate for analysis in the EIR. The mitigation measure requires that the detailed design review consider actual transit operating conditions at the time the detailed design is initiated to determine the appropriate methods to achieve the identified

[63] During the preparation of the Central SoMa Plan EIR Response to Comments, it was determined that M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street, was not feasible as this measure conflicts with an approved project on Fifth Street included in the 2009 Bike Plan. The Bike Plan EIR provides project-level clearance for bicycle facilities on Fifth Street between Market and Townsend streets. The approved project includes removing a northbound travel lane on Fifth Street between Townsend and Bryant streets. Therefore, Mitigation Measure M-TR-3d was removed from the EIR.

performance standards and to assess whether additional modifications beyond those identified in the street network changes could be implemented to further enhance transit operations on the identified corridors. The actions identified in the mitigation measure are feasible transit and traffic engineering improvements that could substantially lessen or avoid impacts on transit capacity and delay. The specific actions will be developed over time in response to the actual pattern of future development under the Central SoMa Plan as needed to meet the performance standards of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Thus, contrary to the commenter's assertion, future SFMTA review of the transit corridor improvements identified in Mitigation Measure M-TR-3a during the detailed design phase does not constitute deferral of mitigation.

As discussed above, the commenter focusses on only a portion of Mitigation Measure M-TR-3a: the "Enhanced Transit Funding" and "Transit Corridor Improvement Review" components. The commenter does not consider the remaining parts of M-TR-3a: the "Transit Accessibility" and "Muni Storage and Maintenance" components. Nor does the commenter acknowledge the other three mitigation measures in the Draft EIR to address impacts on transit: M-TR-3b, Boarding Improvements; M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets; and M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street (this last measure was determined to be infeasible during the preparation of this RTC document). These measures identify specific transit equipment, infrastructure, and operational improvements that would reduce impacts of the plan on transit service.

In summary, the transit impact analysis presented in the Draft EIR meets the requirements of CEQA. The Draft EIR discloses the significant impact of the Plan on transit; identifies mitigation measures that would substantially lessen or avoid those impacts; acknowledges that it is uncertain whether adequate funding would be available to fully implement these measures or whether SFMTA would provide additional service on the impacted routes to fully mitigate impacts on transit; and determines that the Plan would, therefore, have significant and unavoidable impacts on transit. Contrary to the commenter's assertion, this analysis does not constitute deferral of mitigation, and a revised Draft EIR is not required to address the Plan's transit impacts.

Some comments related to the mitigation measures do not address the adequacy or accuracy of the Draft EIR but, instead, provide updates and clarifications, as well as minor modifications to the language of the mitigation measures in the Draft EIR. SFMTA provided clarification regarding the *Real Estate and Facilities Vision for the 21st Century* report and, upon further review, requested that the reference be deleted from the mitigation measure. In response to these comments, the mitigation measures are corrected as shown below (deleted text is shown as ~~strikethrough~~; new text is <u>double underlined</u>):

> **Mitigation Measure M-TR-3a: Transit Enhancements.** The following are City <u>and County</u> actions that would ~~reduce local and regional~~ <u>the</u> transit impacts associated with implementation of the Central SoMa Plan ~~and proposed street network changes~~.
>
> *Enhanced Transit Funding.* To accommodate project transit demand, the <u>SFMTA, and other</u> City <u>agencies and departments, as appropriate,</u> shall ~~ensure that~~ <u>seek</u> sufficient operating and capital funding ~~is secured~~, including through the following measures:
>
> - Establish fee-based sources of revenue ~~such as parking benefit districts~~.

- Establish a congestion-charge scheme for downtown San Francisco, with all or a portion of the revenue collected going to support improved local and regional transit service on routes that serve Downtown and the Central SoMa Plan Area.
- ~~Seek grant funding for specific capital improvements from regional, State and federal sources.~~ Area Plan funding for transit enhancements.

Transit Corridor Improvement Review. During the design phase, the SFMTA shall review each street network project that contains portions of Muni transit routes where significant transit delay impacts have been identified (routes 8 Bayshore, 8AX Bayshore Express, 8BX Bayshore Express, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness). Through this review, SFMTA shall incorporate feasible street network design modifications that would meet the performance criteria of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Such features could include, but shall not be limited to, transit-only lanes, transit signal priority, queue jumps, stop consolidation, limited or express service, corner or sidewalk bulbs, and transit boarding islands, as determined by the SFMTA, to enhance transit service times and offset transit delay. Any subsequent changes to the street network designs shall be subject to a similar review process.

Transit Accessibility. To enhance transit accessibility, the Planning Department and the SFMTA shall establish a coordinated planning process to link land use planning and development in Central SoMa to transit and other alternative ~~transportation~~ sustainable mode planning. This shall be achieved through some or all of the following measures:

- Implement recommendations of the *Better Streets Plan* that are designed to make the pedestrian environment safer and more comfortable for walk trips throughout the day, especially in areas where sidewalks and other realms of the pedestrian environment are notably unattractive and intimidating for pedestrians and discourage walking as a primary means of circulation. This includes traffic calming strategies in areas with fast-moving, one-way traffic, long blocks, narrow sidewalks and tow-away lanes, as may be found in much of the Central SoMa area.
- Implement building design features that promote primary access to buildings from transit stops and pedestrian areas, and discourage the location of primary access points to buildings through parking lots and other auto-oriented entryways.
- Develop Central SoMa transportation implementation programs that manage and direct resources brought in through pricing programs and development-based fee assessments, as outlined above, to further the multimodal implementation and maintenance of these transportation improvements.

Muni Storage and Maintenance. To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall provide maintenance and storage facilities. ~~In 2013, the SFMTA prepared a *Real Estate and Facilities Vision for the 21st Century* report.[214] The document provides a vision for addressing Muni's storage and maintenance needs, particularly in light of substantial growth in fleet as well as changes in the fleet composition.~~

Mitigation Measure M-TR-3b: Boarding Improvements. The SFMTA shall implement boarding improvements such as ~~low-floor buses and pre-payment~~ the construction of additional bus bulbs or boarding islands where appropriate, that would reduce the boarding times to mitigate the impacts on

~~[214] SFMTA, *Real Estate and Facilities Vision for the 21st Century*, January 2013, http://archives.sfmta.com/cms/cmta/documents/1-29-13VisionReport.pdf, accessed December 31, 2015.~~

transit travel times on routes where Plan ridership increases are greatest, such as the 8 Bayshore, 8AX/8BX Bayshore Expresses, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness routes. These boarding improvements, which would reduce delay associated with passengers boarding and alighting, shall be made in combination with **Mitigation Measures ~~M-TR-3c, Upgrade Transit-only Lanes on Third Street,~~ M-TR-3c~~d~~, Signalization and Intersection Restriping at Townsend/Fifth Streets**, ~~and M-TR-3e, Implement Tow-away Lanes on Fifth Street,~~ which would serve to reduce delay associated with traffic congestion along the transit route.

~~**Mitigation Measure M-TR-3d: Implement Tow-away Transit-only Lanes on Fifth Street.** The SFMTA shall implement a northbound tow-away transit-only lane on Fifth Street between Townsend and Bryant Streets during the p.m. peak period to mitigate the impacts on transit travel times on the 47 Van Ness. This peak period transit-only lane can be implemented by restricting on-street parking (about 30 parking spaces) on the east side of Fifth Street between Townsend and Bryant Streets during the 3:00 to 7:00 p.m. peak period.~~

Two comments referred to incorrect formatting of Mitigation Measures M-TR-3a through M-TR-3c in Draft EIR Table S-1, Summary of Impacts of the Plan—Identified in the EIR, on pp. S-17 through S-19. In response to this comment, the formatting of the mitigation measure in the table is corrected as shown in revised Table S-1 herein, in Section E.1, Draft EIR Revisions. The revisions to these mitigation measures shown above are also included in revised Table S-1.

SFMTA commented on Improvement Measure I-TR-5b: Protected Bicycle Lane Post-Implementation Surveys stating that it is not yet certain that protected bicycle lanes would be installed on the streets identified in the improvement measure. The comment is noted. Surveys would only be conducted as part of this improvement measure if protected bike lanes were implemented.

SFMTA requested text changes to Mitigation Measure M-TR-3a, Transit Enhancements, to state that SFMTA would explore the provision of, rather than provide, maintenance and storage facilities; however, the suggested changes were not made as the edits are not required. The analysis of the mitigation measure acknowledges that constraints related to funding may make all or portions of the mitigation measure infeasible; therefore, transit impacts would remain significant and unavoidable with mitigation, and no revision to the mitigation measure is required.

One comment requests that Draft EIR Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination, p. IV.D-83, be revised to provide site-specific flexibility and exceptions for exigent circumstances, or require limitation of construction truck access during peak commute hours, rather than identifying a pre-determined daytime window. The mitigation measure, as worded in the Draft EIR, would allow truck movements outside of the 9 a.m. to 4 p.m. period, if approved by the SFMTA. However, to limit construction truck access during the peak commute periods, the text of the first bullet of Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination, on Draft EIR p. IV.D-84 (and on Draft EIR p. S-25 of Table S-1) is clarified as follows (deleted text is shown as ~~strikethrough~~ and new text is double underlined):

- *Restricted Construction Truck Access Hours*—Limit construction truck movements ~~to~~ during the hours between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 7:00 p.m., ~~or~~ and other times if ~~approved~~ required by the SFMTA, to minimize disruption to vehicular traffic, including transit during the a.m. and p.m. peak periods.

Comment TR-14: Miscellaneous Transportation Comments

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

O-One Vassar.7
I-Renee.1

"**Page:** **Comment:**
IV.D General The draft Central SoMa Plan has identified the potential for a transit-only lane on Harrison. In order to accommodate this transit-only lane, one traffic lane from each direction is proposed to be removed. However, the DEIR does not seem to address the additional lane width lost from the anticipated sidewalk widening proposed by the Plan. The DEIR should address the interaction of these two proposals and potential impacts on vehicular circulation along Harrison." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Letter, February 13, 2017 [O-One Vassar.7])*

"I want you guys to understand how difficult it is to walk from, let's say, Grace Cathedral down to Powell, take BART get off at Fifth. It is scary, bluntly said. Things I would not want to repeat to you that I cannot unsee. I just want to go to my dance class at eleven o'clock and dance with Dudley in this location where you guys are planning all these construction, construction, construction, jack-hammers every day. My nerves are on edge.

"…

"We must hear everyone that wants to just go to a dance class safely. That's all I ask you guys, to think about that because it's not safe right now. And you need to really understand that. I encourage you guys to really walk the City. Make that part of your plan with all these projects. Just don't take any cars. Take all the public -- well, you can't walk up the hill? Take the cable car up the hill.

"But, please, walk and really examine what's going on. And in this particular project, too. It affects not just the people who live there but the people who want to go there too. Now I don't want to go there, unless my husband goes with me. He has to work." *(Denise Renee, Hearing Transcript, January 26, 2017 [I-Renee.1])*

Response TR-14

One comment requests clarification on how sidewalk widening on Harrison Street would affect travel lane widths and whether this was accounted for in the transportation analysis. Another comment recounts difficulty in walking as well as concerns for personal safety in the Plan Area.

In response to the comment regarding the width of travel lanes on Harrison Street with implementation of the street network changes, the transportation analysis accounts for wider sidewalks on both sides of Harrison Street and a peak-period transit-only lane between Sixth and Second streets, as well as reductions in the number of mixed-flow travel lanes. Under either the Howard/Folsom One-Way Option or the Howard/Folsom Two-Way Option, the travel lane widths would not be reduced from existing conditions.

Figure F-27, Howard/Folsom One-Way Option: Harrison Street Existing & Proposed Typical Cross Sections, and Figure F-29, Howard/Folsom Two-Way Option: Harrison Street Existing and Proposed Typical Cross Sections, of the EIR Appendix F, Proposed Street Network Changes Detail Drawings, present the existing and proposed typical cross-sections for Harrison Street: for the Howard/Folsom One-Way Option and the Howard/Folsom Two-Way Option, respectively. Under both the Howard/Folsom One-Way and Two-Way options, the number of travel lanes would vary between peak period and off-peak conditions. Under both options, sidewalks would be widened to about 15 feet on both sides of the street, and at locations where on-street loading would be required at all times, approximately 7-foot-wide loading bays could be installed within the sidewalk. As shown on these figures, the additional sidewalk width would be provided by eliminating the existing permanent parking lane on either side of the street and, instead, provide peak period travel lane and/or a transit-only lane within the curb lane, and parking within the lane during off-peak periods. Thus, during peak periods, the number of travel lanes on Harrison Street would be five (including one transit-only lane), while during off-peak periods, the number of travel lanes on Harrison Street would be three. The width of the travel lanes would not be reduced from existing conditions (i.e., 10-foot-wide travel lanes).

The detailed configuration of Harrison Street under the Howard/Folsom One-Way and Howard/Folsom Two-Way options by segment for peak and off-peak periods would be as follows:

- Under the Howard/Folsom One-Way Option, Harrison Street between Second and Third streets would have one westbound transit-only lane, two westbound travel lanes, two eastbound travel lanes, and no parallel parking during peak periods. During off-peak periods, parallel parking would be permitted along the north and south curbs, resulting in two westbound travel lanes and one eastbound travel lane; no transit-only lane would be provided during off-peak periods. Between Third and Sixth streets, Harrison Street would have four westbound travel lanes, one westbound transit-only lane, and no parallel parking during peak periods. During off-peak periods, parallel parking would be permitted along the north and south curbs, resulting in three westbound travel lanes; no transit-only lane would be provided during off-peak periods.
- Under the Howard/Folsom Two-Way Option, Harrison Street between Second and Fourth streets would have three westbound travel lanes, two eastbound travel lanes, and no parallel parking during peak periods. Harrison Street would be converted from one-way to two-way operation between Third and Fourth streets to enable Bay Bridge–bound traffic on Fourth Street to utilize Harrison Street instead of Folsom Street. During off-peak periods, parallel parking would be permitted along the north and south curbs, resulting in two westbound travel lanes and one eastbound travel lane. Between Fourth and Sixth streets, Harrison Street would have four westbound travel lanes, one westbound transit-only lane, and no parallel parking during peak periods. During off-peak periods, parallel parking would be permitted along the north and south curbs, resulting in three westbound travel lanes; no transit-only lane would be provided during off-peak periods.

The Department acknowledges the commenter's concerns regarding personal safety and difficulty in walking in the Plan Area. As described on Draft EIR p. IV.D-56, the street network changes include numerous improvements to enhance the pedestrian environment.

D.8 Noise and Vibration

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

- Comment NO-1: Construction Noise Impacts
- Comment NO-2: Traffic Noise Impacts
- Comment NO-3: Mitigation Measures

Comment NO-1: Construction Noise Impacts

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

O-SOMCAN-1.17
O-VEC.17
I-Hestor-1.5
I-Whitaker.2

"**13. The DEIR Does Not Adequately Study the Health Impacts from Increased Noise ….**

…

"Noise in SoMa is already the worst in the City.[20] Any increase in noise levels from construction incentivized by the Central SoMa Plan (p. Vl-44 says it would be 'significant' and that Mitigation Measure M-NO-2a 'would be insufficient to reduce the construction-related noise impacts to a less than significant level, on p Vl-45). Noise levels from construction activity have not been studied in the DEIR."

Footnote:
[20] http://default.sfplanning.org/publications_reports/library_of_cartography/Noise.pdf

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-1.17])

"The SoMa neighborhood also has nearly 50% of the major construction projects within San Francisco. However, the annual measurement of these construction-related noises is not measured cumulatively." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.17])*

"Are noisy [construction] operations to be banned at times existing residents, or new residents coming into the area, i.e. no night time noise." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.5])*

"The Draft EIR is inadequate to not clearly name avoidable noise and vibration issues in the evenings and nighttime. The document needs to be improved to state that the most noisy of machinery cannot be used in the evenings or at night where they would disturb the families living nearby projects - again, this is how we AVOID

these environmental impacts instead of pretending they are so-called 'unavoidable.'" *(James Whitaker, Email, February 12, 2017 [I-Whitaker.2])*

Response NO-1

The first two comments state that construction noise would adversely affect the Plan Area and that cumulative construction noise has not been analyzed in the Draft EIR. The other two comments ask about the potential to prohibit nighttime construction activity that causes substantial noise and/or vibration.

Construction noise is analyzed in Draft EIR Impact NO-2, p. IV.E-23. Draft EIR pp. IV.E-24 and IV.E-25 conclude that, with mitigation, "construction noise from individual development projects within the Plan Area would be reduced to levels that would not substantially exceed ambient noise"; therefore, this impact would be less than significant with mitigation. However, if multiple projects in the Plan Area were under construction simultaneously in close proximity to the same sensitive receptors, Draft EIR p. IV.E-24 finds that construction noise could be significant and unavoidable because of the potential for multiple pieces of heavy construction equipment to be in operation at multiple sites proximate to sensitive receptors (typically, residential units) at the same time. Additionally, the Draft EIR finds construction-generated vibration to be less than significant with mitigation (see Impact NO-3, p. IV.E-27). The Plan-level construction noise analysis considers all potential development that could occur within the Plan Area at a level of detail appropriate for a program-level EIR.

Concerning nighttime prohibition of certain particularly noisy construction activities, as stated on Draft EIR p. IV.E-12, Police Code Section 2908 prohibits nighttime construction (between 8 p.m. and 7 a.m.) that generates noise exceeding the ambient noise level by 5 dBA at the nearest property line unless a special permit has been issued by the City. The purpose of the noise ordinance requirements is to limit nighttime construction noise and prevent sleep disturbance from construction activity. There may be certain construction projects that would seek a nighttime construction permit as allowed by the Police Code[64]; however, as the specific construction schedules and construction methods of all subsequent development projects are unknown, it would be speculative to assume that subsequent development projects would seek a nighttime construction permit. Furthermore, subsequent development projects that are consistent with the development density in the Central SoMa Plan would be required to undergo a project-level analysis to determine whether the proposed project would result in environmental effects that (1) are peculiar to the project or parcel on which the project is located; (2) were not analyzed as significant effects in the Plan EIR; (3) are potentially significant offsite or cumulative impacts that were not disclosed in the Plan EIR; and (4) are more severe than disclosed in the Plan EIR. Therefore, any project-specific effects of nighttime construction would be addressed during the environmental review of subsequent development projects.

One comment remarks that annual construction noise should be measured cumulatively, given the relatively high volume of construction projects in the Plan Area. As explained on Draft EIR p. IV.E-2, noise is typically described based on the equivalent noise level (L_{eq}), which is the steady-state energy level of noise measured over

[64] All Night Noise Permits allow the permittee to work between the hours of 8 p.m. to 7 a.m. with inspection monitoring in place; however, as part of this approval, the noise level is not allowed to exceed 5 dBA above ambient levels after 10 p.m. Work occurring after 10 p.m. is not permitted to use high-impact or pneumatic tools or equipment, requires all excavation work ben done with the use of hand tools, and shall not produce a noise level more than 10 dBA above the local ambient at a measured distance of 25 feet from the edges of the construction site (http://sfpublicworks.org/services/permits/night-noise).

a given time period, and the day-night noise level (L_{dn}), which adds a 10 dBA "penalty" increment to nighttime noise levels (10 p.m. to 7 a.m.) so as to more heavily weight noise generated during nighttime hours in calculating average (24-hour) noise levels. Noise levels generally vary throughout the 24-hour day, with the lowest L_{eq} generally recorded during the overnight hours. Standard environmental noise levels (e.g., within a city) are not typically measured over a period longer than 24 hours, because patterns of noise generation tend to repeat themselves from day to day; for example, traffic noise increases during the morning and evening peak hours, and operational noise from a given establishment would be highest during normal operating hours. Except for worker exposure to very loud noises, such as industrial processes, cumulative exposure to noise over, for example, a year or more, is not generally regarded as a hazard. Therefore, it is generally not relevant to discuss construction noise over the course of a year, particularly given that one project's noisiest construction activity is unlikely to overlap with another nearby project's noisiest construction activity. (For example, pile driving, which is often the noisiest activity associated with construction, typically lasts no more than a few weeks, making two projects' periods of pile driving unlikely to occur at the same time. Likewise, demolition and excavation, also relatively noisy, tend to be shorter construction phases than building erection, which is somewhat less noisy, in general.) As averaging noise levels over a longer period would tend to diminish the resulting noise level, construction noise and other non-continuous noise sources are typically regulated based on maximum noise levels or short-term noise levels, such as an hour or a day, but not on a weekly, monthly, or annual basis. Draft EIR p. IV.E-23 does discuss the potential for cumulative construction noise in the context of overlapping construction projects in Impact NO-2 and acknowledges that, despite mitigation, construction noise impacts could be significant and unavoidable.

Comment NO-2: Traffic Noise Impacts

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

O-VEC.16
O-VEC.18

"The DEIR states that 74% of the South of Market neighborhood has unhealthy decibel levels ranging in excess of 70 db. Due to an increase of intensity of traffic and construction, the Central So Ma Plan would increase that percentage to 83-86% of the South of Market. Some suggestions to alleviate these impacts are to stay indoors. This measure conflicts with the effort to have workers and residents walk to public transportation. SoMa Street grids are some of the largest blocks in the nation. As a result, in order to access parks, schools, businesses or transit, stakeholders are expected to walk nearly twice as long as the rest of the city's neighborhood blocks. And although there are efforts to decrease car ownership and usage, the Environmental Review is silent on the glut of Uber, Lyft and other pick up services that have saturated the Central SoMa region." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.16])*

"Lastly, sounds resonating off of the high rises along Rincon Hill, Transbay and Moscone Plan Areas should also be further analyzed, as Central SoMa developments will be occurring under very different landscape

conditions than previous construction." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.18])*

Response NO-2

The first comment alleges that the Draft EIR states that most of the Plan Area is subject to "unhealthy" noise levels. The comment also states that increased traffic from Plan-generated development would increase noise levels in the Plan Area, and that residents and workers remaining indoors to avoid noise levels would conflict with efforts to get them to walk or to take public transportation. The second comment refers to sound reverberating off existing high-rise buildings and seeks further noise analysis.

The Draft EIR does not state that the Plan Area or the South of Market neighborhood are subject to "unhealthy" noise levels. Rather Draft EIR p. IV.E-8 says that, based on noise modeling completed by the San Francisco Department of Public Health, "virtually all major streets in the Study Area are subject to traffic noise levels in excess of 70 dBA (Ldn)."[65] While the Draft EIR also states that this noise level exceeds the 60 dBA (L_{dn}) maximum "satisfactory" noise level recommended in the General Plan for residential uses, the Draft EIR does not claim that health effects would necessarily ensue. This is because, while exterior noise levels in the Plan Area are relatively high, interior noise levels, where the most sensitive activities such as sleeping generally occur, can be much lower. The Draft EIR p. IV-E.3 states that a well-insulated building can provide up to 35 dB of noise attenuation, while a more-conventional residential building can reduce exterior noise by up to 25 dB if building windows are closed and about 15 dB with open windows.

The Draft EIR noise analysis considers interior noise levels in order to evaluate impacts on residential receptors. It does not recommend that people remain indoors to avoid traffic noise as the commenter suggests.

Concerning TNCs, many observers report that such services have increased traffic volumes in San Francisco. However, there is limited information as to how TNCs affect travel behavior (that is, whether people using these services are making trips they would not otherwise make, or substituting a TNC ride for a trip they would make by another mode, such as private auto, transit, taxi, walking, etc.). For example, as discussed in Response TR-7, a report from the UC Davis Institute of Transportation Studies appears to provide some evidence for the proposition that TNCs induce vehicular travel. On the other hand, the SFMTA's 2017 Travel Decisions Survey, also discussed in Response TR-7, shows that while TNC trips increased from 2 percent in 2014 to 4 percent in 2017, the overall auto mode share stayed between 45 to 47 percent during these years. The U.S. Census Bureau and other government sources do not currently include TNC vehicles as a separate travel mode category when conducting survey/data collection; thus, little can be determined from these standard transportation industry travel behavior data sources. For further discussion of TNCs, see Response TR-7, p. RTC-151.

Concerning noise levels reverberating off buildings, as stated in Draft EIR Chapter II, Project Description, p. II-22, the Plan would allow a limited number of high-rise buildings over a relatively large area. While the commenter does not specifically define what they consider to be a high-rise building, in the Plan, a high-rise building is considered to be a minimum of 160 feet tall. Most height limits would remain at 85 feet or less. As shown in Draft EIR Figure II-7, Proposed Plan Area Height and Bulk Districts, p. II-19, and Figure II-9, 3-D

[65] dBA = A-weighted decibel, the most common measure of environmental noise, which takes into account human response to sound; L_{dn} = the day-night noise level, described in Response NO-1.

Models of Existing and Proposed Potential Building Height and Bulk, p. II-21, the potential locations of high-rise buildings would be dispersed and the resulting urban form would not resemble Rincon Hill or other areas where high-rise buildings are concentrated. Because the major streets in the Plan Area are typically 82.5 feet wide, the angle from traffic on the street to upper stories of 85-foot-tall buildings would be relatively flat, compared to areas with narrower streets, such as the north-of-Market downtown area where streets are less than 70 feet wide.[66] This would limit the ability for reflected sound to reverberate and would permit a greater percentage of sound energy to dissipate into the atmosphere and limit the potential for reverberation.[67]

Comment NO-3: Mitigation Measures

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

O-CSPO.6
O-CSPO.7
O-CSPO.8

"**Page:** **Comment:**
"S-29 Mitigation Measure M-NO-la. Legislation establishing a TDM Program was adopted by the City in February, 2017. The text of this mitigation measure states that project sponsors shall develop and implement a TDM Plan as part of approval, the scope of which shall be in accordance with the Planning Department's TDM Standards for the type of development proposed. However, the measure also states that each project's TDM Plan shall 'aim to achieve the maximum VMT rate reduction feasible.'

These above statements may conflict, as the TDM Standards do not require project sponsors to achieve a 'maximum VMT rate reduction feasible,' but instead to implement TDM measures as necessary to achieve the project's applicable TDM point targets. The later sentence should be eliminated, to clarify that this mitigation measure does not require project sponsors to take on greater TDM Plan obligations than would otherwise be required by the program implemented by the Planning Department." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.6])*

"**Page:** **Comment:**
"S-30 Mitigation Measure M-NO-1b. This mitigation measure requires project sponsors to implement noise analysis for new development including PDR, Places of Entertainment, or 'other uses that would potentially generate noise levels substantially in excess of ambient noise … ' The Department should clarify the range of development types to which this measure would likely apply, or indicate how it will determine whether a potential development qualifies for this 'other uses' category." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.7])*

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[66] Street widths obtained from San Francisco Public Works Grade Maps (e.g., Map 320_gm and Map 006_gm), *http://bsm.sfdpw.org/subdivision/keymap/default.aspx*, accessed November 18, 2017.
[67] Echeverria Sanchez, G.G., et. al., "The Effect of Street Canyon Design on Traffic Noise Exposure Along Roads," 97 (2016) 96–110; reviewed November 18, 2017.

"**Page:** **Comment:**
"S-31 Mitigation Measure M-NO-2a. This mitigation measure imposes a range of construction noise control measures. Plan area projects should not be required to exceed requirements of the current San Francisco Noise Ordinance for construction-related activities." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.8])*

Response NO-3

The first comment seeks to clarify the discrepancy between the TDM Program and Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects. As discussed in Response LU-2, p. RTC-110, development projects within the Plan Area would be subject to the requirements of the TDM Program, which became effective March 19, 2017. The adopted TDM Program supersedes Mitigation Measure M-NO-1a for those projects in the Plan Area for which development applications are submitted after January 1, 2018. Projects for which an application was filed prior to January 1, 2018, are subject to a reduced quantitative target under the TDM Program, and such projects in the Plan Area would remain subject to Mitigation Measure M-NO-1a. However, this mitigation would not apply to 100 percent affordable housing projects. As such, the following text has been added at the end of the fourth paragraph on Draft EIR page IV. E-18 to explain why 100 percent affordable housing projects in the Central SoMa Plan Area are exempt from the requirements of Mitigation Measure M-NO-1a (deleted text is shown as ~~strikethrough~~; new text is double underlined):

> **Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects**, would reduce traffic noise by reducing traffic volumes generated in the study area. The Transportation Demand Management (TDM) measures would encourage drivers to switch to alternative modes of travel, such as walking, biking, and transit. However, it cannot be stated with certainty that the reduction in traffic volume would be sufficient to avoid significant impacts to existing land uses in and near the study area. This mitigation measure would not apply to 100 percent affordable housing projects. As detailed in the Transportation Demand Management Technical Justification[248a], 100 percent affordable housing projects generally do not include much accessory parking and data indicates that affordable housing reduces VMT. A review of 100 percent affordable housing projects built in San Francisco between 2006 and 2015 show that 50 of 63 projects were built with little (20 accessory parking spaces or fewer) to no accessory parking.

In response to the comment on Mitigation Measure M-NO-1a and to further clarify the applicability of this mitigation measure for subsequent development projects, the following revisions have been made to Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects (deleted text is shown as ~~strikethrough~~; new text is double underlined):

> **Mitigation Measure M-NO-1a: Transportation Demand Management for New Development Projects.** To reduce vehicle noise from subsequent development projects in the Plan Area, the project sponsor and subsequent property owners (excluding 100 percent affordable housing projects) shall develop and implement a TDM Plan for a proposed project's net new uses (including net new accessory

[248a] Wade Wietgrefe, San Francisco Planning Department, "TDM Technical Justification". January 10, 2018. Accessed March 15, 2018.

parking spaces) as part of project approval. The scope and number of TDM measures included in the TDM Plan shall be in accordance with Planning Department's TDM Program Standards for the type of development proposed, and accompanying appendices.[250] The TDM Program Standards and accompanying appendices are expected to be refined as planning for the proposed TDM Ordinance continues. Each subsequent development project's TDM Plan for proposed net new uses shall conform to the most recent version of the TDM Program Standards and accompanying appendices available at the time of the project Approval Action, as Approval Action is defined in Section 31.04(h) of the San Francisco Administrative Code. The Planning Department shall review and approve the TDM Plan, as well as any subsequent revisions to the TDM Plan. The TDM Plan shall target a reduction in the vehicle miles traveled (VMT) rate (i.e., VMT per capita), monitor and evaluate project performance (actual VMT), and adjust TDM measures over time to attempt to meet VMT target reduction. This measure is applicable to all projects within the Plan Area that do not otherwise qualify for an exemption under Article 19 of the CEQA Guidelines. This measure ~~may be~~ is superseded for those projects that are already required to fully comply with the ~~if a comparable~~ TDM Program Standards ~~Ordinance is adopted that~~ (i.e., without reductions in target requirements) in the Plan Area. ~~The TDM Plan shall be developed by the project sponsor for each particular development project, and shall aim to achieve the maximum VMT rate reduction feasible.~~ The TDM Plan shall be developed in consultation with the Planning Department and rely generally on implementation of measures listed in ~~*Updating Transportation Impacts Analysis in the CEQA Guidelines* document published by California Office of Planning and Research on August 6, 2014, or whatever document supersedes it, and~~ the Planning Department TDM Program Standards and accompanying appendices in effect at the time of the Project Approval Action. The TDM program may include, but is not limited to the types of measures, which are summarized below for explanatory example purposes. Actual development project TDM measures shall be applied from the TDM Program Standards and accompanying appendices, which describe the scope and applicability of candidate measures in detail:

1. Active Transportation: Provision of streetscape improvements to encourage walking, secure bicycle parking, shower and locker facilities for cyclists, subsidized bike share memberships for project occupants, bicycle repair and maintenance services, and other bicycle-related services;
2. Car-Share: Provision of car-share parking spaces and subsidized memberships for project occupants;
3. Delivery: Provision of amenities and services to support delivery of goods to project occupants;
4. Family-Oriented Measures: Provision of on-site childcare and other amenities to support the use of sustainable transportation modes by families;
5. High-Occupancy Vehicles: Provision of carpooling/vanpooling incentives and shuttle bus service;
6. Information: Provision of multimodal wayfinding signage, transportation information displays, and tailored transportation marketing services;
7. Land Use: Provision of on-site affordable housing and healthy food retail services in underserved areas; and
8. Parking: Provision of unbundled parking, short term daily parking provision, parking cash out offers, and reduced off-street parking supply.

Footnote:

[250] San Francisco Planning Department, ~~Draft~~ *TDM Program Standards*, ~~July 2016~~ February 2017, and accompanying appendices, which implements the adopted TDM Ordinance (Ordinance No. 34-17, effective March 19 2017), *http://sf-planning.org/tdm-materials-and- resources,* accessed on ~~September 19, 2016~~ July 13, 2017.

The second comment seeks further clarification on the range of development types that would require implementation of noise analysis for new development, as described in Mitigation Measure M-NO-1b, Siting of Noise-Generating Uses. The Planning Department evaluates application of this measure—which has been included in similar form in other area plan EIRs—on a case-by-case basis, based on a project's anticipated levels of noise generation. In response to this request for clarification, the following additions have been made to M-NO-1b, Siting of Noise-Generating Uses (deleted text is shown as ~~strikethrough~~; new text is double underlined):

> **Mitigation Measure M-NO-1b: Siting of Noise-Generating Uses.** To reduce potential conflicts between existing sensitive receptors and new noise-generating uses, for new development including PDR, Place of Entertainment, or other uses that may require the siting of new emergency generators/fire pumps or noisier-than-typical mechanical equipment, or facilities that generate substantial nighttime truck and/or bus traffic that would potentially generate noise levels substantially in excess of ambient noise (either short-term during the nighttime hours, or as a 24-hour average), the Planning Department shall require the preparation of a noise analysis that includes, at a minimum, a site survey to identify potential noise-sensitive uses within 900 feet of, and that have a direct line-of-sight-to, the project site, and including at least one 24-hour noise measurement (with maximum noise level readings taken so as to be able to accurately describe maximum levels reached during nighttime hours), prior to the first project approval action. The analysis shall be prepared by persons qualified in acoustical analysis and/or engineering and shall demonstrate ~~with reasonable certainty that the proposed use would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use~~ that the proposed use would meet the noise standard identified in San Francisco Police Code Article 29. Should ~~such~~ any concerns be present, the Department ~~may~~ shall require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering ~~prior to the first project approval action~~, and the incorporation of noise reduction measures as recommended by the noise assessment prior to the first project approval action.

The third comment contends that subsequent development projects in the Plan Area should not be required to implement noise controls during construction in accordance with Mitigation Measure M-NO-2a, General Construction Noise Control Measures, beyond those required under the San Francisco Noise Ordinance. However, mitigation measures similar to Mitigation Measure M-NO-2a are routinely applied to development projects that could result in significant noise impacts because compliance with the noise ordinance does not always ensure that construction-generated noise would not "expose persons to substantial temporary or periodic increases in noise levels substantially in excess of ambient levels" (Impact NO-2, Draft EIR p. IV.E-23). For example, the noise ordinance exempts impact tools and is also evaluated based on individual pieces of equipment operating and not the simultaneous operation of multiple pieces of equipment, whereas the Plan requires consideration of such instances where additional noise mitigation measures may be warranted.

D.9 Air Quality

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

- Comment AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
- Comment AQ-2: Air Quality Mitigation Measures

Comment AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion

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

O-CSN-1.20
O-CSN-1.22
O-CSN-1.23
O-CSN-1.55
O-SOMCAN-1.18

"**B. The Plan will have Significant Adverse Air Quality Impacts that are not Disclosed or Analyzed in the DEIR.**

"As discussed by environmental consultants, Matthew Hagemann, C.Hg., and Jessie Jaeger, B.S., [of] Soil Water Air Protection Enterprise (SWAPE), the air quality analysis is woefully inadequate. SWAPE states:

> The DEIR concludes that the Plan would have a less than significant air quality impact (p. IV.F-33). This conclusion, however, is incorrect for several reasons. First, the air quality analysis conducted within the DEIR is based on outdated baseline data that do not accurately reflect current traffic, air quality, pedestrian safety, and population within the Plan area. Second, the DEIR fails to account for all major development projects currently being considered within the area. As a result, the Plan's net increase in criteria air pollutants within the area, as well as it's cumulative air quality impact, are misrepresented. Due to these reasons, we find the DEIR's air quality analysis and resultant significance determination to be inadequate, and require that an updated DEIR be prepared to adequately evaluate the Plan's air quality impact. (Exhibit B, p.1).

[Editor's Note: The preceding paragraph is repeated as Comment CSN-1.55 and is not reproduced a second time in the interest of brevity.]

"While the DEIR admits that individual projects built pursuant to the Plan may have significant impacts, (DEIR, p. IV.F-34), it fails to acknowledge that these individual projects are made possible only because of the Plan and it is therefore the Plan itself that has significant impacts, as well as the individual projects. In essence, the City acknowledges individual impacts of specific projects, while ignoring cumulative impacts of the Plan." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.20])*

"**2. Plan Exceeds Applicable CEQA Significance Thresholds.**

"The DEIR erroneously concludes that the Plan will have less than significant air quality impacts. (DEIR, p. IV.F-33). The DEIR bases this conclusion on the allegation that growth in VMT will be less than growth in population. Id. However, as discussed above, employee VMT will actually increase under the Plan. Therefore, this conclusion is contradicted by the facts and is arbitrary and capricious.

"**a. DEIR Violates SB 743 by Basing Air Quality Impacts on VMT.**

"SB 743, expressly states that even if VMT is reduced (which it is not), the agency must still analyze air quality impacts and pedestrian safety impacts, among others. Pub. Res. Code §21099(b) states:

> (3) This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.[17]

"The City has done precisely what is prohibited by SB 743. The City concludes (erroneously) that since the Plan reduces VMT, it does not have significant air pollution impacts. SB 743 prohibits this type of analysis and requires an independent analysis of air quality impacts. Therefore, the City has failed to proceed in a manner required by law and has thereby abused its discretion."

Footnote:

[17] OPR Draft Regulations for SB 743, p. III:15 (Jan. 20, 2016) state:

> Models can work together. For example, agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location. However, in doing so, agencies should be careful to avoid double counting if the sketch model includes other inputs or toggles that are proxies for trip length (e.g. distance to city center). Generally, if an agency changes any sketch model defaults, it should record and report those changes for transparency of analysis. Again, trip length data should come from the same source as data used to calculate thresholds, to be sure of an "apples-to-apples" comparison.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.22])

"**b. Plan Has Highly Significant Air Quality Impacts Related to Criteria Air Pollutants.**

The DEIR acknowledges that the BAAQMD has established CEQA significance thresholds for air pollution, and that these thresholds apply to the Plan. (DEIR, p. IV.F.1; IV.F-7; IV.F-35).

- Under BAAQMD CEQA Guidelines, a CEQA project with more than 510 apartments [or] condominiums will have significant emissions of the [o]zone precursor, reactive organic gases (ROGs). (DEIR, p. IV.F-35). The Plan will result in 14,400 new housing units in the Plan area – 28 times above the BAAQMD CEQA significance threshold!
- Under the BAAQMD CEQA Guidelines, a project with more than 346,000 square feet of office space will have significant emission of the ozone-precursor, nitrogen oxides (NOx). (DEIR, p. IV.F-35). The Plan will allow 10,430,000 square feet of office space – 30 times above the BAAQMD CEQA Threshold.

"When an impact exceeds a duly adopted CEQA significance threshold, as here, the agency abuses its discretion if it refuses to acknowledge a significant impact. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. See, e.g. *Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 (County applies BAAQMD's 'published CEQA quantitative criteria' and 'threshold level of cumulative significance'). See also *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-111 ('A "threshold of significance" for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant'). The California Supreme Court recently made clear the substantial importance that a BAAQMD significance threshold plays in providing substantial evidence of a significant adverse impact. *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 327 ('As the [South Coast Air Quality Management] District's established significance threshold for NOx is 55 pounds per day, these estimates [of NOx emissions of 201 to 456 pounds per day] constitute substantial evidence supporting a fair argument for a significant adverse impact'). The City has abused its discretion by failing to disclose the Plan's significant criteria air pollutant impacts. A recirculated DEIR is required to disclose this impact and propose all feasible mitigation measures." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.23])*

"**Failure to Adequately Assess the Plan's Air Quality Impact"**

[See Editor's Note above in Comment O-CSN-1.20.]

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.55])

"**13. The DEIR Does Not Adequately Study the Health Impacts from … Degraded Air Quality….**

"Also after construction, the degraded air quality from increased traffic, increased idling from vehicles stuck in traffic or increased ride-hailing vehicles, or from increased truck traffic will all have detrimental impacts." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-1.18])*

Response AQ-1

The comments state that the Draft EIR incorrectly concludes that the Plan would have a less-than-significant impact on air quality because the analysis is based on outdated baseline data and because cumulative development impacts were not properly accounted for. The comments also state that the Plan would increase employee vehicle miles traveled (VMT) as well as increase ride-hailing vehicles and truck traffic, and that therefore, the less-than-significant conclusion regarding the Plan-level criteria air pollutant analysis is inadequate.

Regarding the baseline data, see Response GC-2 on p. RTC-375 of this document, which demonstrates that the Draft EIR's baseline data is adequate.

Regarding the commenter's statement that "the DEIR fails to account for all major development projects currently being considered within the area," see Response CU-3, p. RTC-301, where the commenter expands upon this comment and a complete response is provided. The response explains the Draft EIR's approach to cumulative impacts analysis, noting in particular that, BAAQMD considers criteria air pollutant impacts to be cumulative by nature, and projects that would exceed project-level thresholds would result in a considerable

contribution to cumulatively significant regional air quality impacts. Although the Plan itself would not conflict with or obstruct implementation of the applicable air quality plan, violate any air quality standard or contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard, subsequent individual development projects that could be permitted under the Plan could contribute considerably to cumulative criteria air pollutant impacts. Accordingly, the Draft EIR identifies a ***significant unavoidable impact*** in Impact C-AQ-1.

The Draft EIR evaluates air quality impacts in accordance with the Bay Area Air Quality Management District (BAAQMD) methodology for assessing air quality impacts of plans at a program level of analysis under CEQA, which was published in 2011 and again in 2017, in the CEQA Air Quality Guidelines (BAAQMD 2017).

As disclosed on Draft EIR p. IV.F-21, "The Plan is a regulatory program and would result in new planning policies and controls for land use to accommodate additional jobs and housing. With the exception of the street network changes and open space improvements, the Plan itself would not result in direct physical changes to the existing environment. Indirect effects from the Plan could result as subsequent development projects allowed under the Plan could replace existing residences and businesses, or increase space for residences or businesses in the Plan Area."

Therefore, in recognition that the Plan would enable larger and higher-density development projects than allowed under current zoning, the Draft EIR focuses on the indirect effects of the Plan's rezoning. The Draft EIR therefore evaluates the criteria air pollutant effects of the Plan based on BAAQMD's CEQA Guidelines using both the Plan-level analysis methodology for the policy framework and rezoning and the project-level analysis methodology for assessment of potential subsequent development projects, proposed street network changes, and open space improvements.[68] Impact AQ-2, which the commenter is referring to, contains the program-level analysis. Impacts AQ-3 and AQ-4 address the air quality impacts of subsequent development projects, street network changes, and open space improvements at a project-level. Cumulative criteria air pollutant impacts are addressed under Impact C-AQ-1.

Plan Level Analysis

BAAQMD CEQA Air Quality Guidelines p. 9-2 specifies that, in order to meet the threshold of significance for operational-related criteria air pollutant and precursor impacts, a proposed plan must demonstrate that the increase in projected VMT or vehicle trips (VT) (either measure may be used) is less than or equal to its projected population increase. The BAAQMD, which is the regional agency responsible for air quality planning in the air basin, has specifically recommended an air quality analysis using VMT as one metric to assess air quality impacts of plans. The guidelines state that a VMT increase is assessed relative to the plan's population increase. If VMT would increase at a lower rate than the plan's population increase, the BAAQMD CEQA Air Quality

[68] The City relies on BAAQMD guidance inasmuch as BAAQMD is the regional agency responsible for air quality planning in the Air Basin and is the agency with the greatest expertise in air quality analysis. Litigation over the BAAQMD's 2010 Guidelines that was resolved by the California Supreme Court and the state Court of Appeal left the BAAQMD significance thresholds intact, although the Supreme Court ruled that, in general, CEQA does not require analysis of the effects of locating development in areas subject to environmental hazards unless the project would exacerbate such existing hazards. Moreover, as stated on Draft EIR p. IV.F-21 (footnotes omitted), the "The thresholds of significance discussed below are based on substantial evidence identified in Appendix D of the 2011 BAAQMD CEQA Guidelines and its 2009 Justification Report and are, therefore, used as the basis for determining criteria air pollutant and odor air quality impacts under CEQA."

Guidelines state that criteria air pollutant impacts of the plan are considered less than significant. As shown on Draft EIR p. IV.F-33, the Plan would result in a VMT increase of 77 percent and a population increase of 154 percent; thus, in accordance with the BAAQMD CEQA Air Quality Guidelines, the Plan-level analysis correctly concludes that criteria air pollutant impacts would be less than significant.

The commenter states that the Central SoMa Plan would have a significant air quality impact because the Plan would allow for development in amounts that exceed the BAAQMD's screening criteria for individual development projects, shown in Draft EIR Table IV.F-7, Operational Criteria Air Pollutant Screening for Expected Plan Area Uses, p. IV.F-35. Examples cited by the commenter include a project with more than 510 apartments or condominiums or an office project of more than 346,000 square feet. The Central SoMa Plan is a land use plan (what the BAAQMD CEQA Guidelines call a long-range plan), not an individual development project, and it is, therefore, subject to an evaluation process different from that applicable to an individual development project to determine if it would have a significant impact. The commenter incorrectly conflates the BAAQMD screening criteria for individual development projects with the Plan-level significance thresholds discussed in the preceding paragraph and on Draft EIR p. IV.F-21. As set forth on p. IV.F-21, the evaluation of significance for the Plan, a program-level document, asks whether:

1. The Plan would be consistent with the control measures contained in the current regional air quality plan;
2. The Plan would support the primary objectives of that air quality plan;
3. The Plan would not hinder implementation of that air quality plan;
4. Plan-permitted growth in VMT would not exceed Plan-permitted population growth; and
5. The Plan would not cause localized CO impacts.

The Plan would not result in a significant impact with respect to air quality because it meets each of the criteria listed above. The screening criteria cited by the commenter, conversely, apply to individual development projects in the Plan Area that could be considered following adoption of the Plan. Such projects are discussed in the following section.

Regarding the comment that the Plan would increase employee VMT within the Plan Area, the commenter appears to refer to the information presented in Draft EIR Section IV.D, Transportation and Circulation. Draft EIR Table IV.D-6, Average Daily VMT per Capita, SF-CHAMP Model Data, Existing (2012) and 2040 Conditions, p. IV.D-38, shows that modeled VMT per office job in the Plan Area would increase between without-Plan and with-Plan scenarios, for both 2012 (existing conditions) and 2040 (cumulative conditions). CEQA requires a comparison between existing conditions and future conditions with project implementation. Therefore, the correct impact evaluation under CEQA is the comparison between 2012 (existing) conditions without the Plan and 2040 conditions with the Plan. (The year 2040 was selected because it is assumed that the Plan Area would be built out with reasonably foreseeable development by that time.)

As can be seen in Draft EIR Table IV.D-6, VMT per Plan Area office job would decrease from 8.2 under 2012 conditions to 7.1 with the Plan under 2040 conditions, a decline of 13.4 percent. As shown in Draft EIR Table IV-1, Summary of Growth Projections, p. IV-6, Plan Area employment is projected to increase from 45,600 to 109,200, nearly a 140 percent increase, and most of the new employment being office jobs. This job growth increase would likely result in an incremental increase in the Plan Area's "commute shed," the area from which employees are

drawn. This is anticipated to result in the small increase in VMT per Plan Area office job when compared to conditions in 2040 without the Plan. However, with Plan implementation, the average VMT per Plan Area office job would be 58 percent below the Bay Area average VMT per office job. Moreover, according to Metropolitan Transportation Commission modeling data, no transportation analysis zones outside San Francisco would have fewer than 10.0 daily VMT per capital in 2040.[69] Therefore, Plan implementation would result in less office employment VMT than if the office jobs projected for the Plan Area were accommodated somewhere else in the Bay Area. This conclusion reinforces the concept, set forth in the Plan, that providing for increased employment in an area well-served by transit is a key strategy in sustainable development.

Analysis of Subsequent Development Projects

The Draft EIR discloses the potential for subsequent development projects, proposed street network changes, and open space improvements to result in significant criteria air pollutant impacts during operation (Impact AQ-3, p. IV.F-34) and construction (Impact AQ-4, p. IV.F-38). The BAAQMD provides screening criteria by land use type, including those cited by the commenter, to determine when additional air quality modeling is necessary. An individual development project that exceeds the size of one or more of the screening criteria could potentially result in a significant air quality impact, and may require additional air quality modeling to determine whether the criteria air pollutant thresholds (listed on Draft EIR p. IV.F-24) would be exceeded. The BAAQMD screening criteria are not CEQA thresholds of significance, as stated by the commenter. Rather, as stated on Draft EIR p. IV.F-34, "A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds." That is, a subsequent development project within the Plan Area (but not the Plan itself) that exceeds one of the screening criteria in size could potentially exceed a BAAQMD project-level significance threshold, although whether that project would exceed a threshold can only be determined through more detailed air quality modeling. The screening thresholds simply present examples, based on previously conducted air quality modeling, of the size of various projects that could be expected to exceed one or more BAAQMD project-specific thresholds for either criteria pollutant emissions. It is noted, however, that land uses in San Francisco typically generate far less vehicle traffic than a similar land use of comparable size in most other Bay Area locations, because the City's relatively higher density and its relatively robust transit service allow for a greater percentage of trips to be made by modes other than single-occupancy vehicles. This means that the BAAQMD screening criteria are conservative when applied in San Francisco, because a project in San Francisco must typically be considerably larger than the applicable screening criterion to result in an exceedance of a BAAQMD significance threshold. However, as explained above, the screening criteria are not applicable to programmatic analysis of the proposed Plan. Instead, consistent with the BAAQMD CEQA Guidelines, analysis of a plan's potential impacts evaluates whether the plan would be consistent with the applicable regional air quality plan, including whether the rate of increase in VMT would be less than the rate of increase in population, as stated in the preceding section of this response.

The analysis in Draft EIR Impact AQ-3, p. IV.F-34, determined that the potential exists for individual development projects within the Plan Area to generate vehicle trips and other operational emissions, such as emissions from natural gas combustion, landscape maintenance activities, and painting that would result in a significant increase in criteria air pollutants. Four discrete mitigation measures are identified to reduce this

[69] Metropolitan Transportation Commission, Simulated VMT per Capita by Place of Work, 2040, *analytics.mtc.ca.gov/foswiki/Main/PlanBayAreaVmtPerWorker*, accessed January 31, 2018.

significant impact. Despite the mitigation measures, Draft EIR p. IV.F-37 notes that the "feasibility or effectiveness of mitigation measures identified below is unknown at this time; therefore, air quality impacts associated with long-term development and proposed street network changes would be considered ***significant and unavoidable***." Thus, the Draft EIR fully discloses the significant impact of subsequent development projects on regional criteria air pollutant emissions.

A similar analysis of subsequent development projects to address construction-related criteria air pollutant impacts is provided in Impact AQ-4. This analysis finds that construction of subsequent development projects could result in significant criteria air pollutant impacts. Mitigation Measures M-AQ-4a, Construction Emissions Analysis, and M-AQ-4b, Construction Emissions Minimization Plan, are identified to reduce this impact to a less-than–significant level. The commenters raised no concerns regarding the analysis of subsequent development projects presented in Impacts AQ-3 and AQ-4.

Cumulative Criteria Air Pollutant Analysis

Cumulative criteria air pollutant impacts are addressed under Impact C-AQ-1, Draft EIR pp. IV.F-54 to IV.F-55. In accordance with the BAAQMD CEQA Air Quality Guidelines and as stated on Draft EIR p. IV.F-27, "Regional air quality impacts are by their very nature cumulative impacts. Emissions from past, present and future projects contribute to adverse regional air quality impacts on a cumulative basis, and no single project is sufficiently large to result in nonattainment of ambient air quality standards." Therefore, as noted on p. IV.F-27, the thresholds used in the Draft EIR are "… based on levels at which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, if a project's emissions are below the project-level thresholds, the project would not be considered to result in a considerable contribution to cumulatively significant regional air quality impacts." Consideration of other major development projects is unnecessary in determining whether a plan or project would result in cumulative criteria air pollutant impacts because the Bay Area air basin is already a nonattainment area for ozone and particulate matter. Instead, a cumulative criteria air pollutant impact already exists and the analysis then determines whether the plan or project's contribution to the cumulative impact is considerable.

Similar to the Plan-level analysis discussed above, the Draft EIR finds that the Plan's policy framework and rezoning would not contribute considerably to cumulative criteria air pollutant impacts because the Plan's rate of growth in VMT would not exceed the rate of population growth. However, subsequent development projects have the potential to exceed the *project-level* thresholds during operations. Therefore, subsequent development projects could result in a considerable contribution to cumulative criteria air pollutant impacts. This impact was determined to be significant and unavoidable with mitigation and is disclosed on Draft EIR p. IV.F-54.

In summary, the Draft EIR contained an analysis of criteria pollutant air quality impacts using not only a BAAQMD-recommended methodology that uses VMT as a metric for assessing significance, but also included an assessment of the impact of subsequent development projects using BAAQMD methodology that utilizes emissions thresholds. Significant and unavoidable individual and cumulative criteria air pollutant impacts are disclosed in the Draft EIR, as such, no changes to the Draft EIR are required based on the comments.

Comment AQ-2: Mitigation Measures

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

O-CSN-1.24
O-CSN-1.25
O-VEC.19

"**c. Plan Has Highly Significant Air Quality Impacts Related to Toxic Air Contaminants.**

"Almost the entire Plan area is already listed as an Air Pollution Exposure Zone (APEZ), meaning air pollution-related cancer risk already exceeds 100 per million. (DEIR Figure VI.F-1). Under BAAQMD CEQA significance thresholds, any increase in cancer risk above 10 per million is considered significant. (DEIR, p. IV.F.23). The DEIR admits that 'as a result of Plan-generated traffic … excess cancer risk within the Air Pollutant Exposure Zone would increase by as much as 226 in a million and PM-2.5 concentrations would increase by up to 4.54 $\mu g/m^3$ at individual receptor points. These levels substantially exceed the thresholds identified in the Approach and Analysis subsection.' (DEIR p. IV.F.-48). In other words, the Plan will cause cancer risk to almost triple in the Plan area, from 100 per million to 326 per million. The increase of 226 per million exceeds the CEQA significance threshold by 22 times. Of particular concern to the Neighbors is the fact that the property at 631 Folsom, is currently not with[in] the APEZ. (DEIR Figure VI.F-1). However, with Plan implementation, the property will exceed the cancer risk threshold and it will be re-designated as part of the APEZ. (DEIR, Figure IV.F-3). This is a particular concern to the Neighbors because the building is not equipped with high efficiency air filtration (MERV-13), and the DEIR includes no mitigation measure to require retrofitting of existing buildings with filtration." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.24])*

"**d. The DEIR Contains Inadequate Air Pollution Mitigation and Alternatives.**

"While the DEIR acknowledges that the Plan has significant impacts related to toxic air contaminants (TACs), it does not impose all feasible mitigation measures to reduce such impacts. The DEIR contains only four weak mitigation measures to reduce air quality impacts: 1) electrical hook-ups for diesel trucks at refrigerated warehouses; 2) low-VOC paints; 3) best available control technology for diesel back-up generators; and 4) 'other measures' to reduce air pollutant emissions.

"**i. DEIR Improperly Relies on Deferred Air Mitigation.**

"The fourth mitigation measure is a clear example of deferred mitigation that is prohibited by CEQA. CEQA requires mitigation measures to be clearly set forth in the EIR so that the public may analyze them and their adequacy. 'Other' undefined measures provides [no] specificity. Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency's decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. Guidelines, section 15126.4(a)(1)(B) states: 'Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.'

"'A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA.' (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307.) '[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment.' (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92 (*Communities*).)

"The fourth mitigation measure is a clear example of deferred mitigation prohibited by CEQA. A new DEIR is required to clearly identify specific mitigation measures that will be required to reduce air pollution impacts.

"**ii. DEIR Fails to Analyze or Require all Feasible Mitigation Measures.**

"There are numerous feasible mitigation measures that should be required to reduce the Plan's air quality impacts. The California Attorney General has published a list of feasible measures to reduce greenhouse gas emissions from projects and area plans. (Addressing Climate Change at the Project Level, California Attorney General's Office, Available at http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, Exhibit E). These same measures would reduce the Plans emissions of NOx, ROGs and TACs. All of the measures in the Attorney General document should be analyzed in a revised DEIR and imposed a[s] mandatory mitigation measures. These measures include, but are not limited to:

- Energy efficiency audits of existing buildings.
- Energy efficiency upgrades to existing buildings not otherwise required by law, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization (perhaps targeted to specific communities, such as low-income or senior residents).
- Programs to encourage the purchase and use of energy efficient vehicles, appliances, equipment and lighting.
- Programs that create incentives to replace or retire polluting vehicles and engines.
- Programs to expand the use of renewable energy and energy storage.
- Preservation and/or enhancement of existing natural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.
- Improvement and expansion of public transit and low- and zero-carbon transportation alternatives.
- Requiring solar photo-voltaic panels on all new and existing buildings.
- Require Energy Star Appliances in all new buildings.
- Require energy efficient lighting in all new buildings, particularly LED.
- Require all new buildings to be LEED certified.
- Require solar hot water heaters.
- Require water-efficiency measures.
- Require energy storage facilities to store solar energy.

- Require electric vehicle charging stations to encourage use of the clean cars.

"All of these measures are feasible and should be analyzed in a revised DEIR." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.25])*

"With the implementation of the current Central So Ma Plan, Environmental Review identifies that nearly the entire SoMa neighborhood will be under the Air Pollutant Exposure Zone (APEZ). This means residents, visitors and workers will be exposed to harmful air particles, gases and heavy metals that have been proven to cause cancer, asthma and other chronic health impacts. Although staff have identified that many of the impacts will be significant and avoidable, efforts to mitigate negative impacts have been focused on vehicular patterns, speed of travel and reduction of parking. In many new high rise developments, exposure to pollutants can be filtered out. However, for low income residents, small businesses, nonprofits, park and school users, these mitigations will be out of reach. Planning needs to look at mitigation efforts that help the entire community. This should include frequent and accessible educational efforts by air quality professionals, funding for health screenings and treatments, and capital funds for filtering systems to be added to older developments and public facilities.

"We request that these areas raised here be addressed with proper mitigation measures, identified in the DEIR. We look forward to working together to reach an amenable resolution, in the most efficient and timely manner. Please feel free to contact us, if you seek further discussion or comments." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.19])*

Response AQ-2

These comments address the adequacy of the mitigation measures proposed in the Draft EIR and suggest additional mitigation measures to reduce project impacts.

Adequacy of Proposed Mitigation Measures

Draft EIR p. IV.F-37 identifies four mitigation measures to reduce the air quality impact of subsequent development projects. Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects, requires subsequent development projects to employ TDM measures. Mitigation Measure M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-Volatile Organic Compounds (VOCs) Consumer Products, requires sponsors of subsequent development projects to educate tenants on the use of low-VOC consumer products. Mitigation Measure M-AQ-3b, Reduce Operational Emissions, requires implementation of Mitigation Measure M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps, to reduce emissions associated with diesel generators and fire pumps. This mitigation measure also requires electrical hook-ups for loading docks, use of low- and super-compliant-VOC architectural coatings and other measures that may reduce criteria air pollutant emissions either on site or off site. The commenter characterizes these mitigation measures as "weak" and contends that the portion of Mitigation Measure M-AQ-3b that identifies other measures constitutes deferred mitigation. The commenter is mistaken.

The mitigation measures identified in the Draft EIR under Impact AQ-3 are designed to reduce each of the major sources of operational emissions of criteria pollutants related to urban development—namely, vehicle exhaust, VOCs from consumer products and architectural coatings, refrigerated trucks, backup diesel generators, and

diesel-powered fire pumps—by implementing transportation demand programs to reduce vehicle travel; educating residential and commercial tenants about low-VOC products; requiring the use of low- and super-compliant-VOC architectural coatings in maintaining buildings; requiring electrical hook-ups for diesel trucks with Transportation Refrigeration Units at building loading docks; and requiring that diesel-powered emergency equipment employ engines that meet specified emissions standards and be fueled with renewable diesel, R99, if such fuel is commercially available. As such, these mitigation measures would substantially reduce the operational criteria pollutant emissions (as well as some toxic air contaminants that result in adverse health effects) of subsequent development under the Plan, satisfying the requirements of CEQA. The commenter focuses on only one part of Mitigation Measure M-AQ-3b to support his contention that this measure constitutes deferral of mitigation, without considering the entirety of the measure. Specifically, the commenter argues that by including the requirement to implement "[o]ther measures that are shown to effectively reduce criteria pollutant emissions" as the fourth and final provision of Mitigation Measure M-AQ-3b, the Draft EIR defers mitigation.

Mitigation Measure M-AQ-3b is not a deferral of mitigation because it identifies three well-established and effective methods to reduce operational criteria emissions before the final "other measures" provision. This provision is included to require *additional* criteria emissions reduction techniques and technologies if they are developed or identified in the future. Including this provision is appropriate for a plan EIR that is intended to function as the primary CEQA environmental review for subsequent development projects that conform with the development density established under the Plan for the lifetime of the Plan, as during that time new measures or technologies may become available that could more effectively, or more efficiently, reduce air quality impacts, consistent with CEQA. Therefore, Mitigation Measure M-AQ-3b does not constitute deferral of mitigation, but rather expands the number of mitigation measures beyond the three, already CEQA-compliant, measures laid out in Mitigation Measure M-AQ-3b. Indeed, Mitigation Measure M-AQ-3b would meet the requirements of CEQA if the fourth bullet were deleted entirely from the Draft EIR. To provide a specific example of other types of mitigation measures that could be considered, Draft EIR p. IV.F-37, Mitigation Measure M-AQ-3b, Reduce Operational Emissions, fourth bullet, has been revised as follows (deleted text shown in ~~strikethrough~~; new text is double-underlined):

- Other measures that are shown to effectively reduce criteria air pollutant emissions onsite or offsite (e.g., mitigation offsets) if emissions reductions are realized within the SFBAAB. Measures to reduce emissions onsite are preferable to offsite emissions reductions.

Mitigation Measures Suggested for Further Consideration

Regarding the comment listing mitigation measures from the California Attorney General's Office as possible measures that should be included in the Draft EIR to reduce ROG, NO_x, and TAC emissions, it is noted that the Attorney General's document that sets forth these mitigation measures states, "the measures can be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees)." Many of the measures recommended by the Attorney General's Office are either implicitly or explicitly incorporated into any proposed project or plan in San Francisco, including the proposed Central SoMa Plan, as they are already required by existing local regulations. As they are measures required to be implemented pursuant to state or local regulations (e.g., Green Building Code), it is not necessary to also require them as mitigation measures in the EIR. As discussed on Initial Study p. 99, San Francisco has implemented regulations to reduce greenhouse gas emissions specific to new

construction and renovations of private developments and municipal projects. These regulations are listed in San Francisco's Strategies to Address Greenhouse Gas Emissions.

The San Francisco Green Building Code effectively addresses the suggested measures from the Attorney General's Office that target energy-efficiency audits of existing buildings and energy-efficient upgrades to existing buildings. Specifically, San Francisco's Green Building Ordinance (San Francisco Building Code Chapter 13C, also known as the San Francisco Green Building Code) requires all renovations and alterations of existing buildings greater than 25,000 square feet to meet a specified level of green building. All new residential buildings are required to obtain at least 75 GreenPoints under the GreenPoint Rated system, which includes points for energy-efficient appliances (including ENERGY STAR appliances), equipment, and lighting. The GreenPoint Rated system also provides credits for energy storage systems. In addition, the GreenPoint Rated system has prescriptive requirements for water heating that includes solar thermal systems with a minimum 30 percent solar fraction.

The Green Building Ordinance requires renewable energy generation and/or procurement for larger new commercial buildings. New mid-sized commercial buildings must provide onsite renewable energy or purchase renewable energy credits. The Green Building Ordinance also requires existing buildings proposing commercial interiors, or major alterations, greater than 25,000 square feet to achieve LEED Gold certification.

With respect to the measure involving charging for electric vehicles, California Green Building Code Section 4.106.4 requires new residential buildings with 17 units or more to provide electrical capacity and wiring to accommodate installation of electric vehicle charging spaces for 3 percent of total off-street parking spaces. Effective January 1, 2018, San Francisco has increased this requirement to apply to 100 percent of off-street parking spaces in all residential buildings, including single-family dwellings, and to apply to major residential renovation as well. For non-residential buildings, California Green Building Code Section 5.106.5.3 requires electric vehicle charging to be available for new construction with 10 or more off-street parking spaces. Effective January 2018, San Francisco has increased this requirement to apply to 100 percent of off street parking spaces in all new non-residential buildings and major renovations.

One of the suggested measures from the Attorney General's Office addresses improvement and expansion of public transit and low- and zero-carbon transportation alternatives. San Francisco already has a considerably lower per capita VMT than other Bay Area cities and counties, in part because of its extensive public transit system and its relatively greater population and employment density. This measure suggested by the Attorney General's Office has considerably less relevance for development in San Francisco, which already has substantial public transit service and also has a relatively high percentage of trips made by non-carbon alternatives such as bicycling and walking. Moreover, transit is also addressed by Mitigation Measure TR-3a, Transit Enhancements, p. IV.D-53, which identifies measures that would increase transit frequency and, therefore, capacity, and would reduce the effect of increased ridership on the Other Lines corridor of the Southeast screenline of the Muni downtown screenlines.

The suggested measures from the Attorney General's Office that address enhancement of existing natural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) would not be applicable to the densely developed urban environment of the Plan Area, nor would such measures address significant impacts related to criteria air pollutants or TACs.

As described above, many of the measures suggested in the comment are already required by existing local regulations. The mitigation measures identified in the Draft EIR are designed to address the primary sources of criteria air pollutant measures. Other measures, such as programs to create incentives to replace or retire polluting vehicles and engines could be required as part of Mitigation Measure M-AQ-3b, Reduce Operational Emissions, p. IV.D-54, during review of subsequent development projects. However, even with implementation of these measures, for the reasons disclosed in the Draft EIR, it cannot be stated with certainty that each subsequent development project's resulting criteria air pollutant impact could be reduced to less than significant, and thus this impact would remain significant and unavoidable.

The commenter correctly notes that nearly the entire SoMa neighborhood would be classified as meeting the Air Pollutant Exposure Zone (APEZ) criteria with the implementation of the Central SoMa Plan. As noted on pp. IV.F-9 and IV.F-10:

> Areas with poor air quality, termed the 'Air Pollutant Exposure Zone,' were identified based on the following health-protective criteria: (1) excess cancer risk greater than 100 per one million population from the contribution of emissions from all modeled sources, or (2) cumulative $PM_{2.5}$ concentrations greater than 10 $\mu g/m^3$. The Air Pollutant Exposure Zone (APEZ) is expanded in certain geographic health vulnerable areas of the city, primarily the Bayview, Tenderloin, and much of the South of Market (SoMa) area, including the northern part of the Plan Area, to be more protective, with the areas included in the APEZ based on a standard that is 10 percent more stringent than elsewhere in the city (i.e., areas where the excess cancer risk exceeds 90 in one million or the $PM_{2.5}$ concentration exceeds 9 $\mu g/m^3$).

The Draft EIR, in Impact AQ-5 (operational impacts) and Impact AQ-6 (construction impacts), includes a health risk analysis because Central SoMa is in a health-vulnerable area of the city. This analysis concludes that operational health risk impacts would be significant and unavoidable, while construction health risk impacts could be reduced to less-than-significant levels with implementation of Mitigation Measure M-AQ-6a, Construction Emissions Minimization Plan, p. IV.D-73. The Draft EIR identifies a number mitigation measures that would be feasible for subsequent development projects to implement. These mitigation measures focus on reducing emissions from individual projects and include:

> **Mitigation Measure M-AQ-5a: Best Available Control Technology for Diesel Generators and Fire Pumps.** This measure requires all diesel generators and fire pumps to have Tier 4 or a Level 3 particulate filter as well as to be fueled with renewable diesel.
>
> **Mitigation Measure M-AQ-5b: Siting of Uses that Emit Particulate Matter ($PM_{2.5}$), Diesel Particulate Matter, or Other Toxic Air Contaminants.** This measure requires the preparation of an analysis by a qualified air quality specialist to identify residential or other sensitive receptors within 1,000 feet of such project sites and include an estimate of emissions of toxic air contaminants from the source, identification all of the feasible measures to reduce emissions, and to ensure such measures are incorporated into the project prior to the first approval action.
>
> **Mitigation Measure M-AQ-5c: Update Air Pollution Exposure Zone for San Francisco Health Code Article 38.** This measure requires the Department of Public Health to update the Air Pollution Exposure Zone Map in San Francisco Health Code Article 38, at least every five years.
>
> **Mitigation Measure M-AQ-5d: Land Use Buffers around Active Loading Docks.** This measure requires that sensitive receptors be located as far away as feasible from truck activity areas including loading docks and delivery areas.

Mitigation Measure M-AQ-6a: Construction Emissions Minimization Plan. This measure requires that all projects within the Air Pollutant Exposure Zone and newly added Air Pollutant Exposure Zone lots identified in Figure IV.F-2, Parcels Newly Added to Air Pollutant Exposure Zone with Plan Implementation, comply with a Construction Emissions Minimization Plan.

Mitigation Measure M-AQ-6b: Implement Clean Construction Requirements. This measure requires that construction of street network changes and open space improvements adjacent to newly added air pollution exposure zone lots identified in Figure IV.F-2 to comply with the Clean Construction requirements for projects located within the APEZ.

Two commenters suggested a mitigation measure to retrofit existing buildings with enhanced filtration and ventilation systems. However, there are many challenges to retrofitting existing buildings: some buildings would require substantial upgrades to their heating and ventilation systems; buildings may need to be appropriately weatherized to ensure that outdoor air intrusion is limited; and existing buildings may face other environmental conditions that need to be abated, such as mold or lead paint removal.[70] As of the publication of this RTC document, there have been no occupied residential buildings in San Francisco that have been fully retrofitted to comply with Article 38 requirements.[71] Substantial evidence does not demonstrate that it would be feasible to retrofit an occupied residential building for compliance with Article 38.

In response to the comments received on the Draft EIR, the San Francisco Planning Department conducted further research to determine whether there are additional feasible measures to reduce health risk impacts to sensitive receptors. One such measure is identified. The Planning Department has added a new mitigation measure M-AQ-5e, Central SoMa Air Quality Improvement Strategy, to reduce health risk impacts as a result of Plan implementation (deleted text is shown as ~~strikethrough~~; new text is double underlined):

Mitigation Measure M-AQ-5e, Central SoMa Air Quality Improvement Strategy. The Central SoMa Plan is expected to generate $22 million in revenue dedicated to greening and air quality improvements. A portion of these monies shall be dedicated to identifying and exploring the feasibility and effectiveness of additional measures that would reduce the generation of, and/or exposure of such emissions to persons whose primary residence is within the Plan Area and whose residence does not provide enhanced ventilation that complies with San Francisco Health Code Article 38. Objective 6.5 of the Plan calls for improvements to air quality, with specific strategies to support reduced vehicle miles traveled, increased greening around the freeway to improve air quality and use of building materials and technologies that improve indoor and outdoor air quality. The Planning Department, in cooperation with other interested agencies or organizations, shall consider additional actions for the Central SoMa Plan Area with the goal of reducing Plan-generated emissions and population exposure including, but not limited to:

- Collection of air quality monitoring data that could provide decision makers with information to identify specific areas of the Plan where changes in air quality have occurred and focus air quality improvements on these areas;
- Additional measures that could be incorporated into the City's Transportation Demand Management program with the goal of further reducing vehicle trips;

[70] Jonathan Piakis, "Re: Central SoMa AQ Mitigation Measures," Email message to Elizabeth White (SF Planning Department), October 20, 2017.

[71] Timothy Nagata, "Central SoMa – Another request for DBI assistance from Planning Dept," Email message to Elizabeth White (SF Planning Department), November 9, 2017.

- Incentives for replacement or upgrade of existing emissions sources;
- Other measures to reduce pollutant exposure, such as distribution of portable air cleaning devices; and
- Public education regarding reducing air pollutant emissions and their health effects.

The Department shall develop a strategy to explore the feasibility of additional air quality improvements within four years of plan adoption.

Vehicle emissions account for the majority of toxic air contaminants generated from implementation of the Plan and these emissions are regulated by the state. Implementation of this measure would seek to identify additional feasible strategies to reduce plan-generated emissions and the exposure of sensitive receptors to substantial pollutant concentrations as a result of the Central SoMa Plan. As shown above, the Draft EIR includes now seven measures to reduce the health risk impact on sensitive receptors. However, it is unknown whether all of these measures together would sufficiently reduce the health risk impact to less-than-significant levels. Therefore, the significant and unavoidable impact would remain significant and unavoidable even with the implementation of M-AQ-5e. The addition of M-AQ-5e after the circulation of the Draft EIR does not result in any inadequacy of the Draft EIR, does not set forth new information, and does not require recirculation of the Draft EIR because this measure would not change the level of significance of the air quality impact identified in the Draft EIR, which was determined to be significant and unavoidable with mitigation.

The commenter also suggests that the EIR include a mitigation measure that would provide health screenings to affected populations. Health screenings would not reduce emissions generated by the Plan or exposure of sensitive populations to those emissions. As stated above, the EIR now includes seven mitigation measures that would reduce the indirect effects of the Plan's emissions and associated health risks. In addition, health effects experienced by people as a result of Plan implementation versus other factors, including exposure to existing ambient air quality, would be difficult to discern from health screenings because health screenings would assess whether a person has developed cancer from all causes, not those only as a result of Plan implementation. For the above reasons, the suggested mitigation measure to provide health screenings was not determined to be an effective measure for reducing the health risks caused by emissions generated from subsequent development projects that could be built under the Plan.

Regarding the suggested measure of education about air quality, see above Mitigation Measure M-AQ-5e. Additionally, comprehensive information about existing air quality conditions, health effects of air quality, and what the public can do to reduce air pollution is available through the Bay Area Air Quality Management District's website and public engagement program. For more information, visit www.baaqmd.gov.

D.10 Wind

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

- Comment WI-1: Dates for Wind Speed Data at 50 United Nations Plaza Building
- Comment WI-2: Wind Setting
- Comment WI-3: Wind Methodology
- Comment WI-4: Westerly Winds Strongly Affect the SoMa Neighborhood
- Comment WI-5: Wind Analysis
- Comment WI-6: Address Maximum Building Heights
- Comment WI-7: Analyze Wind Impacts on Bicyclists
- Comment WI-8: Impacts of the Plan Wind Conditions on Seniors and the Disabled
- Comment WI-9: Analyze Wind Impacts on Elevated I-80 Freeway Structure
- Comment WI-10: Wind Analysis of Subsequent Projects in Plan Area
- Comment WI-11: Cumulative Wind Analysis
- Comment WI-12: Establish a Wind Impact Fee to Support a Consistently Updated Wind Study

Comment WI-1: Dates for Wind Speed Data at 50 United Nations Plaza Building

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

I-Hestor-1.13

"What are the dates for the wind speed data collected at old Federal Building at 50 UN Plaza?" *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.13])*

Response WI-1

The commenter asks about the dates of data collection of the historic wind data relied upon in the Draft EIR wind analysis. The wind speed data collected at the old Federal Building that is the basis of San Francisco wind-tunnel testing was collected between 1945 and 1950.[72] This data source is relied upon for all wind analyses conducted in San Francisco.

[72] Arens, E., et al., "Developing the San Francisco Wind Ordinance and its Guidelines for Compliance," *Building and Environment*, Vol. 24, No. 4, p. 297–303, 1989.

Comment WI-2: Wind Setting

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

O-CSPO.16
O-CSPO.17

"**Page:** **Comment:**
"IV.G-2 San Francisco's Existing Climate and Wind Environment. The first paragraph of this Section states that historic data collected at the San Francisco Federal Building at 50 United Nations Plaza over a six-year period shows that average wind speeds in the city are highest in the summer and lowest in the winter. Later in this paragraph, there is a reference to 'over 40 years of record keeping' used to document the seasonal times of highest and lowest area wind speeds. It appears likely that this record keeping exceeds that collected at the 50 United Nations Plaza and may refer to other wind stations in the area. Please clarify." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.16])*

"**Page:** **Comment:**
"IV.G-3 The first sentences on this page read 'Southwest winds are similarly impeded at street level; they also continue to flow overhead, but they do not flow toward the South of Market (SoMa) area. Both northwest winds and southwest winds also contribute winds along the east/west oriented streets.' This language appears to be referencing the fact that street level southwest winds do not flow toward SoMa due to the misalignment of the street grids. However, the last sentence seems to contradict the previous sentence. Please clarify." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.17])*

Response WI-2

The comments request clarifications regarding the wind setting presented in the Draft EIR.

The statement concerning "over 40 years of record keeping" does refer to wind data collected at the Old Federal Building at 50 United Nations Plaza. However, in developing wind-tunnel testing procedures to implement Planning Code Section 148, only six years of data were converted to digital format for use in post-processing the raw data that is generated by wind-tunnel testing. Nevertheless, the longer data set confirms that, as stated on Draft EIR p. IV.G-1 (not IV.G-2, as incorrectly referenced in the comment), "the highest mean hourly wind speeds (approximately 20 miles per hour [mph]) occur in July, while the lowest mean hourly wind speeds (in the range of 6 mph to 9 mph) occur in November."

North of Market Street, northwest and southwest winds are impeded by existing buildings, as noted on Draft EIR p. IV.G-3, and, therefore, do not flow at the pedestrian level from north of Market Street to south of Market Street, although these winds do contribute to ground-level winds on the east/west-oriented streets north of Market Street. Wind flows south of Market Street, including the Plan Area, are discussed in the four subsequent paragraphs on Draft EIR p. IV.G-3.

Comment WI-3: Wind Methodology

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

O-CSPO.18

"**Page:** **Comment:**
"IV.G-5 Methodology. The second paragraph of this section states 'the approximately four-block area between Bryant and Townsend Streets from the west side of Fifth Street to the east side of Fourth Street …' Assuming that the wind tunnel test area shown in the figure on the next page (Figure IV.G-1) is correct, this should be revised to read 'from the east side of Sixth Street to the east side of Fourth Street.'" *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.18])*

Response WI-3

The comment asks whether the EIR wind section properly describes the area subjected to wind testing. As noted by the commenter, the Draft EIR misstates the area for which wind-tunnel testing was undertaken. Accordingly, the second sentence of the last paragraph on Draft EIR p. IV.G-5 is revised as follows (deleted text is shown in ~~strike-through~~, new text is double-underlined):

> … Wind-tunnel testing and analysis was conducted for two discrete zones (study areas) within the Plan Area that are proposed to undergo the most extensive increases in height limits—the approximately ~~four~~five-block area between Bryant and Townsend Streets from the ~~west~~ east side of ~~Fifth~~ Sixth Street to the east side of Fourth Street, and Harrison Street between Second and Fourth Streets (just north of the I-80 freeway) (see **Figure IV.G 1, Wind Tunnel Test Areas**). …

Comment WI-4: Westerly Winds Strongly Affect the SoMa Neighborhood

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

I-Hestor-1.14

"Planning Code 148, Reduction of Ground-Level Wind Currents in C-3 Districts, was adopted in 1985 as part of the Downtown Plan. Development under Downtown Plan mostly focused development in the eastern part of the C-3 district, specifically C-3-O, C-3-O(SD), C-3-R. Little attention was paid to the C-3-S and C-3-G and wind complications there because no significant high-rise housing or office use was projected. Subsequent to the Downtown Plan a separate more relevant wind study was done focused on westerly winds coming into the western part of the Central So Ma Plan area. The information from that study is more relevant than Planning Code 148 to understanding, avoiding and mitigating winds in this area of South of Market.

"That wind study was done for the Redevelopment Agency by Environmental Review. The Agency was in midst of DONATING the site at southeast 10th & Market to the federal GSA to construct a new federal office building.

Because of concerns over wind conditions, raised by residents of the Tenderloin, there was serious analysis of winds coming over the Hayes Street hill. How winds accelerated and created dangerous conditions as they approached and crossed Van Ness, hit buildings and swarmed onto both Market and areas south of Market." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.14])*

Response WI-4

The commenter suggests that a wind-tunnel analysis undertaken as part of the combined Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the new San Francisco Federal Building is "more relevant than Planning Code Section 148" with respect to the Plan Area. The comment misconstrues both Planning Code Section 148 and the protocols developed for compliance with Section 148, as well as the results of the wind analysis for the Federal Building EIS/EIR.

Planning Code Section 148 establishes criteria for ground-level (pedestrian-level) wind comfort speeds (7 or 11 miles per hour [mph], exceeded 10 percent of the time, for seating and pedestrian areas, respectively) and a wind hazard speed (26 mph exceeded 1 hour per year). As noted by the commenter, Section 148 is applicable to the C-3 (Downtown) Use Districts. Other Planning Code sections apply to certain other parts of the city, including Rincon Hill and the Van Ness Avenue corridor, as well as the Fifth and Mission Special Use District (the 5M project site). However, as stated on Draft EIR p. IV.G-4, the Planning Department relies on the wind hazard criterion of Section 148 in its determination as to whether pedestrian-level winds would "substantially affect public areas" and would, therefore, rise to the level of a significant effect under CEQA.

The Federal Building EIS/EIR, completed in 1997,[73] analyzed a potential site for a new Federal Building at 10th and Market streets, along with an alternative site at Seventh and Mission streets, which is where the building was ultimately constructed. The wind-tunnel analysis for the Federal Building EIS/EIR study referenced by the commenter was completed in accordance with the same Section 148 criteria and protocols as were employed in the wind-tunnel analysis for the Central SoMa Draft EIR. The approach to the wind-tunnel test for the Federal Building followed a standard Section 148 analysis. As stated in the 1997 EIS/EIR, "Test procedures referenced in Section 148 (Wind Ordinance) of the City and County of San Francisco Municipal Code were adhered to."[74]

The area around 10th and Market streets is known to be very windy. The wind analysis for the 1997 Federal Building EIS/EIR tested a number of development options, many of which resulted in an increase in both number of test locations at which the wind hazard speed would be exceeded, as well as the overall number of hours per year during which the hazard criterion would be exceeded. Through this "sensitivity testing," the wind consultant and project architect identified a design concept, referred to in the EIS/EIR, as Option D, that would result in a substantial improvement in wind conditions, compared to existing conditions.[75] In fact, "this design would cause about 300 hours of hazard criterion at the location points measured, compared to 800 hours at existing conditions."[76] Additionally, the number of hazard exceedances would have decreased under

[73] United States General Services Administration, San Francisco Planning Department, and San Francisco Redevelopment Agency, *Final Environmental Impact Statement/Final Environmental Impact Report: San Francisco Federal Building, City and County of San Francisco, San Francisco* (hereinafter, "*Federal Building EIS/EIR*"; Case No. 94.157E; State Clearinghouse No. 96042056); Final EIR, March 21, 1997.

[74] *Federal Building EIS/EIR*, p. 3.14-1. It is noted that the Planning Code is part of the *San Francisco Municipal Code*.

[75] *Federal Building EIS/EIR*, Appendix H, "Wind Analysis Methodology."

[76] *Federal Building EIS/EIR*, p. 4.14-4.

Option D, from 14 under existing conditions to 7 under Option D. Therefore, the proposed Federal Building at 10th and Market streets would have considerably improved wind conditions in the vicinity of the 10th and Market streets location, compared to then-existing conditions.

The 10th and Market streets site vicinity "is, speaking qualitatively, one of the windiest areas in San Francisco."[77] Subsequent wind-tunnel testing for projects including the 10 10th Street ("NEMA") project (Case No. 2003.0262E; complete), which was built on the site formerly considered for the Federal Building, expansion of Fox Plaza (Case No. 2005.0979E; not built), 55 Ninth Street (Case No. 2006.1248E; complete), 150 Van Ness Avenue (Case No. 2013.0973E; under construction), and others have all confirmed that existing conditions at this intersection and in the greater vicinity of Market Street and Van Ness Avenue are very windy. As noted by the commenter, west winds descending the Hayes Street (and nearby) hills, combined with the large widths of Van Ness Avenue and Market Street, and the change in orientation of the street grid from north of Market Street to south of Market Street, all contribute to high winds in this neighborhood. Additionally, the limited number of buildings that are much taller than the majority of buildings in the neighboring area, including the residential building at 100 Van Ness Avenue (formerly the California State Automobile Association tower) and the Fox Plaza tower, also contribute to ground-level wind conditions. The latter building in particular, with its orientation perpendicular to the prevailing westerly winds, affects pedestrian wind conditions at the 10th and Market streets intersection. Notwithstanding these existing windy conditions, each of the above-noted projects approved in recent years has had to comply with Section 148 and would not have otherwise been approved. Therefore, the environmental and planning analysis for each building has included wind-tunnel testing in accordance with the Section 148 procedures also relied upon in wind-tunnel testing for the Central SoMa Plan.

Relying on the same Section 148 wind test procedures, the wind-tunnel test for the Central SoMa Plan reported in Draft EIR Section IV.G, Wind, identified existing wind conditions considerably more benign than in the area around Market Street and Van Ness Avenue. As stated on Draft EIR p. IV.G-12, under existing conditions, the wind hazard criterion is exceeded at three of 47 test points, for a total of 4 hours per year. Under with-Plan conditions, the wind hazard criterion would be exceeded at five of 47 test points, for a total of 85 hours per year, with just three points accounting for 81 of those 85 hours. This compares to the Federal Building EIS/EIR, which reported that 16 of 33 test points exceeded the hazard criterion under existing conditions, for a total of more than 800 hours, under 1997 existing conditions, with more than 15 hours per year of wind hazard exceedance at each of 10 separate points.

In summary, the Federal Building EIS/EIR wind analysis referenced by the commenter relied on the same Section 148 criteria and procedures as were employed in the Central SoMa wind analysis. As such, no revisions are required to the Draft EIR. The Federal Building EIS/EIR wind analysis identified the potential for substantial improvement in pedestrian wind conditions around the intersection of 10th and Market streets; and the Central SoMa Plan Area is less windy than the Market and Van Ness area, including the 10th and Market streets site.

[77] *Federal Building EIS/EIR*, p. 3.14-4.

Comment WI-5: Wind Analysis

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

O-CSPO.20
O-CSPO.21
O-CSPO.22

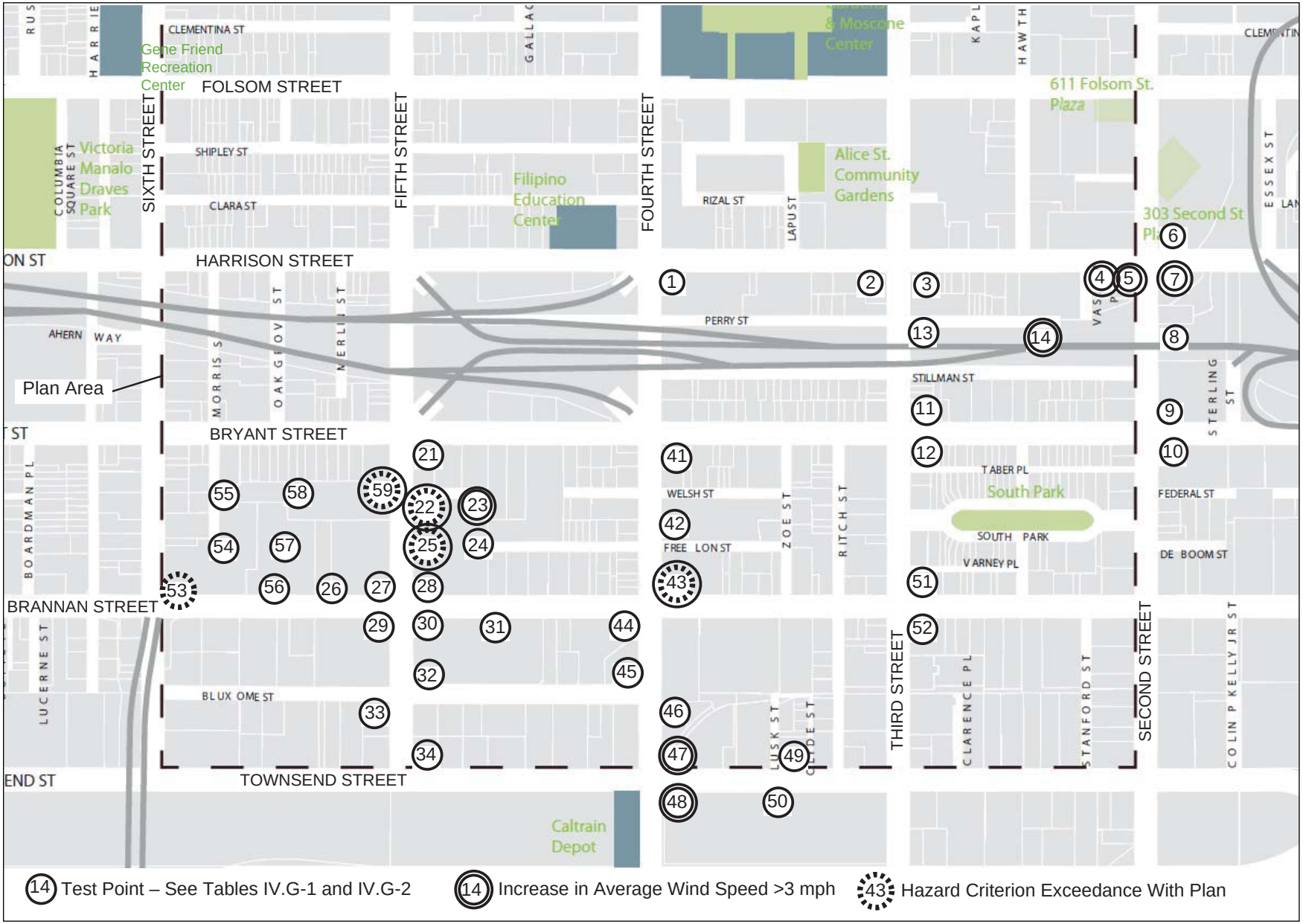
"**Page:** **Comment:**
"IV.G-12 Existing Hazard Conditions. The first paragraph in this section states that three (3) test locations exceed the wind hazard criterion under current conditions. However, test location 29 appears to be at or below the hazard criterion, as shown in Figure IV.G-2. Please clarify." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.20])*

"**Page:** **Comment:**
"IV.G-15 With-Plan Hazard Conditions. The first paragraph in this section states that a new hazard exceedance would occur at location #59, but this is not shown in Figure IV.G-3. Please clarify." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.21])*

"**Page:** **Comment:**
"IV.G-16 Conclusion. This section states that the Plan could result in four (4) new exceedances of the 26-mph hazard criterion, but Figure IV.G-3 shows only three exceedances. Please clarify." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.22])*

Response WI-5

The commenter accurately identifies discrepancies between the text of Draft EIR Section IV.G, Wind, and Figure IV.G-3, Greatest Increases in Wind Speed, p. IV-G-15. Figure IV.G-3 is incorrect. The corrected version of this figure, depicting a total of five exceedances of the 26 mph wind hazard criterion, including Locations 29 and 59 in addition to Locations 22, 25, and 43, is included in Section E, Draft EIR Revisions, of this RTC document and is presented below.



SOURCE: ESA

Case No. 2011.1356E: Central SoMa Plan

Figure IV.G-3

Greatest Increases in Wind Speed [Revised]

Comment WI-6: Address Maximum Building Heights

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

O-CSPO.19

"**Page:** **Comment:**
"IV.G-7 The first full paragraph on this page states that 'the Plan would also allow for eight towers of between 200 feet and 400 feet in height on certain sites south of Bryant street… and for five 160-foot buildings and about half a dozen buildings of 130 feet in height in much of the area south of Harrison Street…' This discussion should incorporate the potential for height limits on some sites within the Plan area to be extended by up to 25 feet, as discussed in Plan Implementation Measure 8.5.1.2 of the current Draft Central SoMa Plan." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Various Central SoMa Property Owners, Letter, February 13, 2017 [O-CSPO.19])*

Response WI-6

The comment states that an additional 25 feet in building height that may be approved for certain sites in the Plan Area should be accounted for in the Draft EIR wind analysis.

No such analysis is required because an allowance of 25 additional feet in building height would only be allowed for projects that can demonstrate that the additional 25 feet would not result in significant ground-level wind hazards. Furthermore, it would be speculative to predict which sites would take advantage of the additional 25-foot height increase. Therefore, the wind analysis did not account for these potentially greater building heights. The Draft EIR wind-tunnel testing was intended "to generally define the pedestrian wind environment that currently exists, and would exist with Plan implementation" (Draft EIR p. IV.G-5) and to not predict wind effects of specific projects. As stated on Draft EIR pp. IV.G-7 to IV.G-9, "the pedestrian-level wind environment around a specific building is highly dependent on the building design … [and] it is anticipated that most individual subsequent development projects that are proposed at heights greater than 100 feet would undergo project-specific wind-tunnel testing, consistent with Planning Department protocols." The generalized level at which the Draft EIR wind analysis was conducted—with a limited number of test locations and incorporating only basic building massing models—is appropriate for a program-level EIR for the Plan Area, given that the pedestrian wind environment is highly dependent upon specific building designs. Moreover, pursuant to Mitigation Measure M-WI-1, Wind Hazard Criterion for the Plan Area, subsequent development projects exceeding 85 feet in height would be required to undergo a wind analysis based on the project's specific building design. Therefore, for all of the reasons above, it is not necessary to evaluate the potential for an additional 25 feet in building heights as part of the Plan-level EIR analysis, and no revisions to the Draft EIR are required.

Comment WI-7: Analyze Wind Impacts on Bicyclists

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

I-Hestor-1.15

"**IV.G** shows that the later study [concerning a 1997 proposal for a new federal building at 10th and Market Streets, described above in Comment WI-4] has resulted in further analyses of the impacts of development in Central SoMa. The effect of the differing street grid pattern north and south of Market is discussed. But other factors not analyzed in this EIR must also be discussed. The effect on BICYCLISTS is important but not discussed. It is different from effects on people seated or walking - both of which have standards in the EIR. There is substantial bicycle traffic TO and FROM the Caltrain station at 4th & Townsend. The Central So Ma is area with and proposed for substantial new construction. Both under Central So Ma Plan and associated with Caltrain itself. All require analysis in regard to compounded wind hazards in a construction zone. I have seen bicyclists blown over by gusts of wind. Active bikers have told me of their own experience biking west on Mission and Market. Winds accelerate when the fog rolls east in the afternoon. The danger to bicyclists must be discussed. Concerns were raised in that regard by Jason Henderson in comments on the One Oak EIR. Please consider his comments as raising issues for THIS EIR." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.15])*

Response WI-7

The commenter states that the Draft EIR should analyze wind effects on bicyclists. While the Planning Code hazard (and comfort) criteria are specific to pedestrian wind conditions, which are typically measured on sidewalks during wind-tunnel testing, the resulting wind speed measurements also reflect wind speeds experienced by bicyclists. This is because bicycle lanes, where they exist, are typically adjacent to parking lanes; hence bike lanes are generally within less than 10 feet of the sidewalk. (Even where there are no bike lanes, cyclists tend to ride to the far right on a street.) This is close enough that wind conditions on a sidewalk are substantially the same as those in the nearest bike lane. A pedestrian wind hazard may also cause potentially hazardous conditions for bicyclists in proximate locations, and it can reasonably be expected that the same winds that would be hazardous to pedestrians would be hazardous to bicyclists. Moreover, as discussed further below, the 26 mph wind hazard criterion is conservative when compared to a standard used in many other locations around the world. Finally, as described on Draft EIR p. IV.G-15, the wind-tunnel testing for the Central SoMa Plan identified three locations—all on Fifth Street between Bryant and Brannan streets—where substantial new wind hazard exceedances—15 hours per year or more at each location—would occur. (This excludes one location, on Fourth Street, where an existing one-hour hazard exceedance would be shifted about 200 feet south, from Freelon to Brannan Street, and increase the hours of the hazard exceedance by one hour per year.) As stated on p. IV.G-15, these three points "are immediately downwind of the Flower Mart site, where a project is proposed that would develop three buildings at heights of 220 feet to 270 feet. As with other potential development included in the wind-tunnel testing, the Flower Mart buildings were tested as basic rectilinear massing models, without articulation that would likely be part of any actual project-specific design. Like all subsequent development projects that propose high-rise buildings, this project would be subject to more detailed project-specific wind-tunnel testing, which would be based on detailed, articulated project designs rather than the simple massing models tested for this Plan analysis." It is quite possible that, when actual building designs are considered, none of these three hazard exceedances would occur.

In the United Kingdom and other parts of Europe, some government agencies rely on a set of wind speed thresholds known as the Lawson Criteria to regulate the wind effects of development projects. Under the Lawson Criteria, there are two thresholds; one for the "able-bodied" and one for the "general public" (elderly,

children, and cyclists). The threshold for the able-bodied is a mean-hourly wind speed of 33.5 mph, and the threshold for the general public is a mean-hourly wind speed of 44.7 mph.[78] The San Francisco wind hazard criterion is an equivalent wind speed of 26 mph. Equivalent wind speed accounts for turbulence intensity, whereas mean-hourly wind speed does not. The San Francisco wind hazard criterion is lower than either of the Lawson Criteria thresholds mentioned above, and it accounts for turbulence intensity. For these reasons, the San Francisco wind hazard criterion is more restrictive and more protective than the Lawson Criteria thresholds, both for the able-bodied and the general public, including bicyclists. As such, no revisions to the Draft EIR are required.

Comment WI-8: Impacts of the Plan Wind Conditions on Seniors and the Disabled

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

O-SOMCAN-Cabande.16

"**13. The DEIR Does Not Adequately Study the Health Impacts from Increased Noise, Degraded Air Quality, Pedestrian Safety Hazards, and Increased Wind Speeds**

"On page V-3, section V.B.6 'Wind' it says that 'Subsequent future development anticipated under the Plan could alter wind in a manner that substantially affects public areas.' Organizations that work with seniors and people with disabilities in SoMa are concerned that any increase in wind speeds caused by the heights and bulk of the proposed buildings in Central SoMa will cause a hardship and injury to seniors and people with disabilities at both public open spaces and in the public rights of way." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.16])*

Response WI-8

The commenter suggests that the Draft EIR does not adequately address wind effects on the health of senior citizens and persons with disabilities who are susceptible to hardship and injury from high winds. The hazard threshold of Planning Code Section 148 is 26 mph for one full hour per year.[79] This wind speed is described as "dangerous, with the probability of people being blown over, *particularly if they are old or infirm*" (emphasis added).[80] Therefore, the hazard criterion does account for potential effects on senior citizens and persons with disabilities. Because it takes about three seconds for the mechanical effect of wind to affect a pedestrian, the

[78] BMT Fluid Mechanics, letter to Barbara W. Sahm, SWCA/Turnstone Consulting, "One Oak Street Project – Wind Microclimate Studies," April 26, 2017.

[79] The wind hazard criterion is derived from the 26 mph hourly average wind speed that would generate a 3-second gust of wind at 20 meters per second (the equivalent of approximately 44 mph).

[80] A.D. Penwarden, "Acceptable Wind Speeds in Towns," *Building Science* 8, 259–267 (1973).

conversion from a three-second (gust) speed of 44 mph to a full hour speed results in the hazard criterion being set at 26 mph.[81]

The comment heading also suggests that the Draft EIR does not adequately address the health impacts resulting from increased noise, degraded air quality, and pedestrian safety hazards. The Draft EIR specifically addresses each of these environmental effects in Section IV.E, Noise and Vibration, p. IV.E-9; Section IV.F, Air Quality, p. IV.F-14; and Section IV.D, Transportation and Circulation, p. IV.D-56. See also Response PH-2, p. RTC-312, for further discussion of how the Draft EIR addresses seniors and persons with disabilities. The commenter has not provided any additional information or evidence as to why these analyses are inadequate in the Draft EIR; therefore, no revisions to the Draft EIR are required.

Comment WI-9: Analyze Wind Impacts on Elevated Interstate80 Freeway Structure

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

I-Hestor-1.16

"The other missing discussion of wind impacts is on vehicles on the elevated I-80 freeway running between Harrison and Bryant Streets. Impacts on seated persons and pedestrians are measured at different heights. As high-rise buildings are built adjacent to and higher than I-80 freeway, what will be wind effects on vehicles on the freeway? Explain whether Figure IV.G-2 has information on the elevated level of 1-80 freeway at sites 11, 13, 14." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.16])*

Response WI-9

The commenter inquires whether wind conditions on the elevated I-80 freeway were evaluated. All of the wind-tunnel test points, including points 11, 13, and 14 noted by the commenter, are at sidewalk pedestrian height, approximately 5 feet above grade. No analysis of wind conditions on the elevated freeway structure was undertaken. While strong winds can sometimes pose a hazard for motorists, this is most often the case on fully exposed roadways. In the Bay Area, high wind warnings are most typically issued for bridges that cross San Francisco Bay, locations where there are no upwind or adjacent buildings to provide any wind buffers, and for hilltop locations. Even these occurrences are relatively rare and are typically associated with winter storms. While the Plan would permit heights up to 350 feet immediately north of the I-80 freeway, and buildings developed pursuant to the Plan would be as much as 270 feet above the height of the elevated freeway structure, none of the conditions described here with respect to exposed roadways would occur. Accordingly, no adverse wind effects on vehicles are anticipated; therefore, none of the wind-tunnel test points was associated with freeway locations. As such, no revisions to the Draft EIR are required.

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[81] Lawson, T.V. and A.D. Penwarden, "The Effects of Wind on People in the Vicinity of Buildings," Proceedings of the Fourth International Conference on Wind Effects on Buildings and Structures, London, 1975, Cambridge University Press, Cambridge, U.K., 605–622, 1976.

Comment WI-10: Wind Analysis of Subsequent Projects in Plan Area

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

I-Hestor-1.19

"**IV.G-7 et seq.** Please explain in clear language how environmental review as to when wind and other project specific impacts will be done for future projects in Central SoMa. The discussion states that study will be done. **IV.G-9 says that subsequent future development could alter winds in a manner that substantially affects public areas. SIGNIFICANT AND UNAVOIDABLE IMPACT.**"

"Since this is EIR for Area Plan, does Planning/Environmental Review expect that the "usual" exemption time line will be followed? That so long as the *Exemption is in hand at the time that the Planning Commission acts*, CEQA requirements are being followed?

"To ensure thoughtful evaluation of project specific impacts, **I request that an Exemption for a project requiring any wind study be approved by the ERO NO LATER THAN 3 weeks before the Planning Commission hearing + that the availability of the Exemption be part of any notice of hearing + and that any Planning Code amendment implementing the Central SoMa Plan include language that requires Planning Commission hearing and approval for a project requiring a wind analysis**."

"Alternatively building heights should be reduced so that heights are kept under 85 feet so that wind speeds do not accelerate." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.19])*

Response WI-10

The commenter asks about the timing for subsequent project-level CEQA review of individual development projects in the Plan Area with respect to potential wind impacts. The commenter requests that CEQA review of subsequent development projects that require a wind study be completed at least three weeks prior to consideration of project approval. Alternatively, the commenter suggests that building heights in the Plan Area be limited to 85 feet to avoid substantial increases in pedestrian-level wind speeds.

Wind analysis of subsequent individual development projects will be undertaken as part of a subsequent project's environmental review, in the same manner that potential wind effects are considered for all proposed projects in San Francisco. Draft EIR Impact WI-1 ("Subsequent future development anticipated under the Plan could alter wind in a manner that substantially affects public areas") was determined to be significant and unavoidable in part because the program-level wind-tunnel testing of Plan Area development was based on generalized building massing and not on specific building designs. Therefore, it cannot be stated with certainty that all potential wind hazard exceedances would be avoided. However, as stated on Draft EIR p. IV.G-16:

> Building designs can be developed (podium setbacks, awnings, terraces, and other articulations) that avoid tall flat surfaces square to prevailing winds. These structural features would be expected to reduce ground-level wind speeds and turbulence. In addition, the presence of large street trees and, potentially, street furniture could further reduce general wind speeds and would improve wind conditions in the Plan Area. Without these features included in the wind tunnel model, the test results reported are

conservative and likely to indicate higher wind speeds than would actually occur. In conclusion, the landscaping features and building articulation would be expected to eliminate the five hazard criterion exceedances that were identified in the Plan condition.

Thus, while it is not certain, there is a reasonably high likelihood that exceedances of the Planning Code wind hazard criterion can be avoided with subsequent development in the Plan Area.

With respect to the procedures for subsequent CEQA review of projects that require wind analysis, including potential wind-tunnel testing, the comment does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

The alternative recommendation to limit Plan Area heights to 85 feet to reduce Plan-level wind impacts identified in the Draft EIR is not necessary because Mitigation Measure M-WI-1, Wind Hazard Criterion for the Plan Area, would substantially reduce Plan-level wind impacts on a project-specific basis. Furthermore, an alternative that limits Plan Area heights to no more than 85 feet would not meet two of the primary objectives of the Plan, as described on Draft EIR p. II-5, which are to increase the capacity for jobs and housing and facilitate an economically diversified and lively jobs center. Additionally, limiting the development capacity of the Plan Area by permitting a maximum height of 85 feet would reduce the amount of fee revenue that could be collected from subsequent development and would, therefore, decrease the Plan's ability to meet its other objectives, including to maintain the diversity of residents; provide safe and convenient transportation that prioritizes walking, bicycling, and transit; offer an abundance of parks and recreational opportunities; create an environmentally sustainable and resilient neighborhood; preserve and celebrate the neighborhood's cultural heritage; and ensure that new buildings enhance the character of the neighborhood and the city. An EIR need not evaluate an alternative that would not feasibly accomplish most of the basic objectives of the project (CEQA Guidelines Section 16126.6(c)). Therefore, no revisions to the Draft EIR are required.

Comment WI-11 Cumulative Wind Analysis

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

I-Hestor-1.17

"The **wind tunnel tests - IV.G-3** et seq - appear to have been one off analyses of individual projects. Not analysis assuming construction of ALL of the projects. Please review the language and explain what cumulative development was in each analysis." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.17])*

Response WI-11

The commenter questions whether the Plan Area wind analysis was based on wind tests of individual development projects and asks what cumulative assumptions were made for the analysis. As stated on Draft EIR p. IV.G-7, the wind-tunnel test was conducted using a model based on development assumptions formulated by the Planning Department. This model generally consisted of extruding parcel lines on assumed development sites within the Plan Area to a base height of up to 85 feet (or the proposed height limit), except

for sites with proposed heights greater than 85 feet. For those parcels, building setbacks were built into the model along with reasonable assumptions for limited tower floor plates and towers sitting on larger parcels. No specific development projects or plans for such projects were tested. Thus, the test encompassed all reasonably foreseeable development within the Plan Area for those locations where the Plan proposes the greatest increases in height, as shown on Draft EIR Figure IV.G-1, Wind Tunnel Test Areas, p. IV.G-6, but at a level of detail limited to general building massing. For more information on the Plan-level wind analysis methodology, see Draft EIR Section IV.G.4, subsections titled "Approach to Analysis" and "Methodology" on pp. IV.G-4 to IV.G-9.

Comment WI-12: Establish a Wind Impact Fee to Support a Consistently Updated Wind Study

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

I-Hestor-1.18

"DEIR acknowledges that windiest areas are generally along 4th and 5th Streets south of Bryant - one of two areas proposed for dramatic height increases. Another area with significant height increases is north of the freeway from 2nd to 4th Street.

"The developers of all buildings over 85 feet - particularly market rate housing and office buildings - should have to contribute to a fund that allows the Planning Department to maintain and consistently update a wind study that on-going basis adds all new construction of whatever height in Plan Area." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.18])*

Response WI-12

The commenter suggests that the Planning Department maintain and consistently update a "wind study," with the costs of such an effort underwritten by development fees. The comment does not address the adequacy or accuracy of the Draft EIR; therefore, no changes to the Draft EIR are required. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. For information, it is noted that it is already the Planning Department's established practice to account for both existing and reasonably foreseeable future development within a project area at the time that wind impact analysis is conducted for proposed projects. Wind-tunnel studies are conducted by consulting firms that maintain and operate their own wind tunnel facilities. The consulting firms also construct the physical models used in wind-tunnel testing, based on plans provided by a project development team (in the case of an individual development project) or, as in the case of the Central SoMa Plan, based on massing assumptions developed by the Planning Department. The assumptions underlying the wind-tunnel models are reviewed by Planning Department staff prior to the start of wind-tunnel testing. This review includes ensuring that the baseline (existing) condition is accurately depicted and that anticipated cumulative development is properly included. The wind-tunnel tests are then undertaken consistent with protocols developed for implementation of Planning Code Section 148, the wind hazard criterion on which the Planning Department relies for CEQA analysis. It would be an inefficient use of time and resources for the Planning Department to own and operate its own wind tunnel, because the major

existing wind tunnels are located outside of the San Francisco Bay Area. Owning and operating a wind tunnel would require the Planning Department to hire qualified staff, duplicating a role that is already performed by qualified consultants with years of experience.

D.11 Shadow

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

- Comment SH-1: Potential Shadow on a Possible Park Site
- Comment SH-2: Conclusion Regarding Shadow Impacts
- Comment SH-3: Extend Proposition K to Privately Owned Public Open Space (POPOS)

Comment SH-1: Potential Shadow on a Possible Park Site

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

O-Tishman.2

"**Page:** **Comment:**
"III-11 Recreation and Open Space Element. The second to last paragraph on this page states that Plan height limits are intended to protect, 'insofar as is feasible, a potential park [site] identified in the Plan on the block bounded by Fourth, Fifth, Bryant, and Brannan Streets.' It should be noted that the proximity of nearby existing buildings and development anticipated under the Plan for adjacent parcels will necessarily result in substantial shadow to this proposed park site." *(Melinda A. Sarjapur, Reuben, Junius & Rose, Tishman Speyer, Letter, February 13, 2017 [O-Tishman.2])*

Response SH-1

The comment notes that existing nearby buildings and anticipated development under the Plan would generate shadow on the potential park site bounded by Fourth, Fifth, Bryant, and Brannan streets. The design and configuration of this potential new open space is not known, nor is any potential future programming of the open space; therefore, it would be speculative to assess how shadow would affect this open space. However, shadow on this potential new open space is discussed for informational purposes on Draft EIR p. IV.H-39. The discussion notes that Plan Area development throughout the year would partially shade the open space. In particular:

> On the summer solstice, this location would be mostly in sunlight during much of the day (between about 9:00 a.m. and 3:00 p.m.), with substantial sunlight even at 8:00 a.m. and as late at 4:00 p.m.;[82] after that time, shadows from development at newly increased height limits would cover an increasing portion of the park until, by 6:00 p.m., when it would be nearly fully shaded. At the spring/fall equinox, there would be substantial sunlight during the midday (10:00 a.m. to 2:00 p.m.), with partial sunlight until shortly after 3:00 p.m. At 9:00 a.m., new shadow could be cast on the park, while between 3:00 p.m. and 6:00 p.m., substantial new shadow from Plan-related development could shadow the potential new park. Very early in the morning (before about 8:30 a.m.) and in the early evening (from 6:00 p.m. on), the potential park would be largely shaded by existing buildings. On the winter solstice, the park site

[82] Before 8:00 a.m., the park would be largely shaded by existing buildings.

would be at least partially shaded, mostly by development at new height limits, throughout the day, with the greatest effect of the increased height limits occurring after 10:00 a.m. Until about 9:00 a.m. and after 3:00 p.m., the potential park would be substantially shaded by existing buildings. However, even on the winter solstice, nearly half of the park would be in sunlight during the noon hour.

Therefore, discussion for informational purposes with regard to shadow on this new potential park as a result of existing and anticipated development under the Plan is addressed in the Draft EIR, and no revisions are required.

Comment SH-2: Conclusion Regarding Shadow Impacts

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

O-CSN-1.30
O-CSN-1.50

"**G. The Plan will have Significant Adverse Shadow Impacts that are not Disclosed or Analyzed in the DEIR.**

"The DEIR erroneously concludes that the Plan does not have significant shadow impacts. (DEIR, p. IV.H-21). This finding ignores the Plan's inconsistency with the General Plan. As discussed above, The Plan is inconsistent with the Recreation and Open Space Element of the General Plan, Policy 1.9: Preserve sunlight in public open spaces. (DEIR, p. III-11). The DEIR admits that the Plan will create new shadow on several parks under the jurisdiction of the Recreation and Park Department, including South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several public open spaces. (DEIR, p. III-11). For example the DEIR admits that the Plan will create new shadows on the only Rec & Park property in the Plan area, South Park, and 'could increase shadow on portions of South Park during early morning and late afternoon hours from the spring equinox to the fall equinox (March through September). (DEIR, p. IV.H-35). In other words, the Plan will cast shadows on South Park for half of the year! Similarly, the DEIR admits that the Plan will cast shadows on the heavily used privately owned public open space (POPOS) located at 303 Second Street from noon 'through much of the afternoon,' and shading up to one-third of the POPOS. (DEIR p. IV.H-38).

"Given these conflicts with the General Plan, the DEIR's finding that the Plan has no significant shadow impacts is arbitrary and capricious. The Reduced Height Alternative would reduce this impact and is feasible and would achieve all project goals." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.30])*

"4. The DEIR Errs in Concluding Project Potential Shadow Effects Will Be Less than Significant

"The Central SOMA Neighborhood (Project area) is currently characterized by mid-rise buildings affording the neighborhood good natural sunlight and light as compared with the Financial District. The changes proposed by the Project (Plan) allow for approximately eight towers between 200 and 400 feet in height, five buildings of 160-feet in height and six of 130 feet in height as well as others ranging from 200 to 350 feet in height. Developments of 100% affordable housing could achieve greater heights by right using the State's affordable housing density bonus. DEIR at II-22. According to the Central Soma Plan and DEIR: 'The proposed height

limits are intended to minimize shadow impacts on South Park, Yerba Buena Gardens, and the Bessie Carmichael School schoolyard.' DEIR at p. II-23.

"Unlike many other topics where the DEIR relies on the Initial Study, in this case, the DEIR addresses the Project's potential shadow effects on publicly accessible areas, including public parks, publicly accessible private open spaces, and sidewalks using computer modeling and detailed graphics displaying shading in DEIR Section IV.H.[26] The conclusion reached concerning shadow impacts is as follows:

> '…development pursuant to the Plan would not create new shadow in a manner that substantially affects the use of existing outdoor recreation facilities or other public areas. Additionally, the specific massing and design of a subsequent development project would be reviewed to determine whether the project could have shadow impacts not identified at this programmatic level of analysis. Therefore, the impact would be less than significant.' DEIR at p. IV.H-38.

"The DEIR's own analysis supports a different conclusion. Specifically, the DEIR's modeling clearly indicates that the Project will result in significant shading of South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several other public open spaces and neighborhood sidewalks. See for example, Figures IV.H-13 and 14 showing shadow on South Park during most of the day during seasons of shorter day length [when sunlight in the limited open spaces in this neighborhood is even more important]. The DEIR states in this regard:

> 'During the seasons of shorter day length and longer mid-day shadows, the Plan could result in an increase in shadow on South Park during most of the day. At the winter solstice, small bits of new shadow could be added to shadow from existing buildings over various parts of the park throughout the day, as shown in Figure IV.H-13 and Figure IV.H- 14.'

"Contrary to the model results and description of the impact above, the DEIR finds the new shadows, despite coverage of one of the few public open spaces, of limited extent and therefore less than significant. This conclusion is laughable given the clear proof in the DEIR that the Project will cast shadows on South Park for nearly half the year. These impacts are compounded by the fact that the neighborhood is so underserved by public parks and recreation spaces.

"Similarly, the extent and duration of shadows cast on public sidewalks will increase as taller buildings are developed, as shown in DEIR Figures IV.H-2 through Figure IV.H-10. Casting shadows for nearly half the year clearly requires a conclusion of significant impact warranting consideration of mitigation and alternatives. Mitigation and alternatives that must be considered to reduce these impacts include but are not limited to:

- Adoption of the reduced height alternative and prohibition of high rises except where immediately adjacent to transit hubs.
- Lower height limits on sites where shadow impacts are shown by the DEIR's analysis to extend into existing open space, park and recreation areas."

Footnote:

[26] It is instructive that the analysis is qualitative. Specifically, according to the DEIR, the analysis is qualitative and not quantitative since quantitative analysis is typically required for analysis of individual buildings under Section 295 or as part of a project specific review. DEIR at p. IV.H-11. A revised DEIR should provide quantitative analysis of the Project as well since numerous specific development projects listed in the DEIR will proceed with Plan adoption.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.50])

Response SH-2

The comments can be summarized to express the following concerns:

- The Draft EIR is inconsistent with General Plan policies protecting sunlight on open spaces;
- The Draft EIR wrongly concludes that shadow effects of Plan Area development would be less than significant; and
- Shadow impacts are significant and, therefore, warrant mitigation and consideration of alternatives.

Inconsistency with General Plan Policies Protecting Sunlight on Open Spaces

The comment, which alleges that inconsistency with the Recreation and Open Space Element indicates a significant impact, is incorrect for the following reasons. First, as stated on Draft EIR p. III-2, "A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA." Rather, a significant environmental effect under CEQA "means a substantial, or potentially substantial, adverse change in any of the ***physical*** conditions within the area affected by the project" (CEQA Guidelines Section 15382) [emphasis added]. While a project's conflict or inconsistency with a general plan policy may indicate the need to investigate a potential physical impact, it does not in itself mean that the project would have a significant impact on the environment.

With respect to Recreation and Open Space Element Policy 1.9, the policy does not state or imply that absolutely no new shadow may be considered on public open spaces. Policy 1.9 acknowledges that "shadows created by new development [near parks] can critically diminish the utility and comfort of the open space," but also makes explicit reference to the controls of Planning Code Section 295. Section 295 restricts shadows from buildings taller than 40 feet "unless it is determined that the impact on the use of the space would be insignificant." The text concludes that the City should support protections for all open spaces "to maintain sunlight in these spaces during the hours of their most intensive use while balancing this with the need for new development to accommodate a growing population in the City." Thus, Policy 1.9 does not prohibit new shadow on public parks and open spaces but calls for limiting such shadow to avoid substantially affecting the use and enjoyment of parks and open spaces. Accordingly, based on the analysis in the Draft EIR, potential new development pursuant to the Plan would not conflict or be inconsistent with Recreation and Open Space Element Policy 1.9. As stated on Draft EIR p. III-2,

> …potential conflicts with the *General Plan* are considered by the decision-makers (in the case of a *General Plan* amendment, the Planning Commission and Board of Supervisors) independently of the environmental review process. Thus, in addition to considering inconsistencies that affect environmental issues, the decision-makers consider other potential inconsistencies with the *General Plan*, independently of the environmental review process, as part of the decision to approve or disapprove a proposed project.

See Response PP-4, p. RTC-96, for further discussion regarding a project's consistency with plans and policies.

Less-than-Significant Shadow Effects of Plan Area Development

The Draft EIR fully analyzes the potential physical effects of shadow that could be cast by Plan Area development and concludes that effects related to shadow would be less than significant because the Plan would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.

As noted on Draft EIR p. IV.H-21, the massing model used for the shadow analysis, while generally representative of a reasonably foreseeable outcome of Plan implementation, did not account for individual building designs, such as articulation in massing, parapets, or rooftop projections, as such details are unknown at this time. Nor did it consider that one or more buildings may not be built even where rezoning would allow for greater height than is currently allowed, or where existing height limits permit taller buildings than currently exist. Therefore, the analysis provided in the Draft EIR is qualitative rather than quantitative. However, the analysis provides a conservative estimation of the magnitude of shadow effects possible under the Plan because the model did not incorporate building articulation. Subsequent development projects proposed in the Plan Area—whether on a site where the height limit would be increased pursuant to the Plan or a site where existing height limits would not change—would be subject to Planning Code Section 295 (if greater than 40 feet tall), as well as Section 147[83] as applicable; therefore, project-specific shadow impacts would be analyzed at that time. In accordance with CEQA Guidelines Section 15183, further project-level environmental review would be required if a project-specific shadow analysis demonstrates that a subsequent development project under the Plan would have a substantial adverse effect on the use and enjoyment of a public open space beyond that identified in the Draft EIR.

Specifically, with respect to the commenter's assertion that "the Plan will cast shadows on South Park for half of the year," the Draft EIR shows that Plan Area development could add small amounts of new shadow to South Park throughout the entire year (see Draft EIR Table IV.H-1, p. IV.H-22, and Figure IV.H-11 through Figure IV.H-14, pp. IV.H-23 to IV.H-26). As shown in the figures, the net new shadow would cover very small areas of South Park and, as explained on Draft EIR p. IV.H-35, the new shadow would be of limited extent, particularly during the midday period of heaviest park use. Therefore, Draft EIR p. IV.H-35 concludes, "Because of the limited extent of potential new shadow, both in terms of area covered and length of time, and because new shadow would not affect the park during times of heaviest use, new shadow would not be expected to affect people's enjoyment of the park substantially." Additionally, shadow could be more limited than identified in the Draft EIR as a result of individual projects' compliance with Planning Code Section 295. Much of the potential new shadow on South Park would be cast by new development on the block that contains South Park and, because no changes in height limit are proposed on this block, the shadow would be caused by new development built to existing height limits. Accordingly, the Draft EIR properly concludes that potential shadow effects of the Plan on South Park would be less than significant.

With regard to the POPOS in front of 303 Second Street, across Second Street from the Plan Area, as noted on Draft EIR p. IV.H-38, new shadow from Plan Area development could cast a small amount of new shadow on the western edge of the POPOS in the mid-afternoon on the summer solstice. On the equinoxes, new shading would begin around noon, and would continue through much of the afternoon, reaching a peak around 2 p.m., when about one-quarter to one-third of the POPOS could be shaded. On the winter solstice, new shading could increase beginning around 10 a.m., and could continue through most of the afternoon. At its peak, new shading could cover most of the plaza, especially between approximately noon and 2 p.m. By 3 p.m. on the winter solstice, most of the plaza is currently shaded. The actual amount of shading would depend on the height and massing of the building projecting its shadow toward this POPOS, which would be determined as part of a

[83] Section 147. Reduction of Shadows on Certain Public or Publicly Accessible Open Spaces in C-3 (Downtown Commercial Districts), South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts.

project-level analysis that would occur for subsequent development projects taller than 40 feet in height. The Draft EIR concludes:

> This plaza is one of the most heavily used POPOS in SoMa because of its seating, landscaping, and fountain and due to the presence of restaurants in the adjacent office building that face the plaza. Use of this open space is particularly heavy at lunchtime, when the plaza would remain largely in sunshine except in late fall and early winter. Because the plaza would remain largely sunny at lunchtime except in late fall and early winter, this POPOS would be anticipated to remain heavily used.

The Draft EIR finds that the shadow impact on this POPOS would be less than significant because it is anticipated that the 303 Second Street POPOS would continue to receive sunshine during the lunchtime period throughout most of the year.

The Draft EIR similarly evaluates physical effects of shadow on Victoria Manalo Draves Park, Gene Friend Recreation Center, and Howard Langton Mini Park, as well as on the Alice Street Community Gardens, Yerba Buena Gardens, Yerba Buena Lane, Jessie Square, Mint Plaza, several nearby POPOS, and sidewalks in and near the Plan Area, and concludes that effects would be less than significant. The relatively small amounts of new shadow that would reach the various open spaces over limited portions of the day and year would not substantially affect the use and enjoyment of these open spaces.

Concerning the potential for added height pursuant to the state density bonus for affordable housing, as discussed further in Response PD-10, p. RTC-80, the state density bonus could be used in the Plan Area, but it cannot be known at which locations project sponsors might seek to use the state density bonus. The state density bonus permits an increase in residential density of up to 35 percent beyond that otherwise allowed, and also permits a project sponsor to request waivers or modifications of Planning Code requirements, including height limit, that would physically preclude the permitted density bonus. However, state density bonus law does not exempt a project from CEQA review. Therefore, any project for which additional height is requested pursuant to state density bonus law would be evaluated under CEQA. Pursuant to CEQA Guidelines Section 15183, if such additional height would result in a significant shadow impact peculiar to the project or project site, additional environmental review could be required beyond the use of a community plan evaluation.[84] The Plan provides for additional height of up to 25 feet on certain sites where a project sponsor dedicates land in the Plan Area for creation of affordable housing or parks. However, as explained in Response PD-2, p. RTC-45, this additional height is likely to be granted only to project sponsors with sites that are large enough to allow flexibility in site planning and building massing to allow for a portion of the site to be dedicated to affordable housing or parkland beyond that otherwise required. Additionally, such additional height must not increase the overall development potential of the Plan and must not result in significant wind or shadow impacts. Any specific proposal that would increase the Plan's overall development potential or result in significant wind or shadow impacts would be ineligible for the 25-foot height limit increase. Therefore, neither the affordable housing density bonus nor the Plan's height bonus would be anticipated to result in substantially greater shadow impacts than those identified in the Draft EIR.

Contrary to the commenter's assertions, the Draft EIR's conclusions with respect to shadow impacts are supported by substantial evidence in the record, and no changes to the Draft EIR are required.

[84] A community plan evaluation is commonly used for projects that would be consistent with an area plan and would have no additional new or substantially more-severe impacts or impacts peculiar to the project or its site.

Consideration of Mitigation and Alternatives for Shadow Impacts

The commenter also remarked that shadow impacts warrant consideration of mitigation and alternatives. As discussed above, the Draft EIR finds that the proposed Plan would not result in significant shadow impacts, and the commenters have not demonstrated that this conclusion is not supported by substantial evidence. Therefore, no mitigation measures to address shadow impacts are required and no CEQA alternatives designed to reduce shadow effects of the Plan are necessary, as CEQA only requires identification of mitigation measures or examination of alternatives to the Plan where a significant impact is identified. Nevertheless, concerning the commenter's preference for the Reduced Heights Alternative, as stated on Draft EIR pp. VI-30 and VI-31, while this alternative would have similar shadow effects to those of the Plan throughout much of the Plan Area and nearby, the Reduced Heights Alternative would incrementally reduce new shadow on both South Park and Victoria Manalo Draves Park. The Draft EIR finds that, like the Plan, the Reduced Heights Alternative would have a less-than-significant effect with respect to shadow. As such, no changes to the Draft EIR are required.

Comment SH-3: Extend Proposition K to Privately Owned Public Open Space (POPOS)

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

O-VEC.2

"Lastly, we ask the Planning Department to extend Proposition K shadow analysis to POPOS. Shadows impact the quality and accessibility of open space and we look to the Planning Department to address these concerns especially if it is recommended that POPOS be used to address the limited open space in the Plan Area." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.2])*

Response SH-3

The comment requests that POPOS in the Plan Area be subject to the analysis methodology used for parks subject to Planning Code Section 295, which was adopted through voter approval of Proposition K in November 1994. This comment does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

D.12 Hydrology (Sea Level Rise and Combined Sewer System)

The comments and corresponding responses in this section cover topics in the Initial Study (Draft EIR Appendix B, Section D.15, Hydrology and Water Quality) and Draft EIR Section IV.1, Hydrology (Sea Level Rise and Combined Sewer System). These include topics related to:

- Comment HY-1: Plan Effects on the Combined Sewer System During Wet Weather
- Comment HY-2: Sea Level Rise between Fifth and Sixth Streets Should Be Studied

Comment HY-1: Plan Effects on the Combined Sewer System During Wet Weather

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

O-VEC.14

"Central SoMa's combined sewage and stormwater drainage system falls within the largest, overused Channel Drainage Basin (covering the Tenderloin, all of SoMa, the Mission, Potrero Hill, Haight, parts of Pacific Heights, the Panhandle, Castro and lower Richmond). Although the analysis of the drainage system's treatment facilities were very detailed, our concern is that many of the plans to upgrade the system by SFPUC were planned to happen as a result of the growth projected by Eastern Neighborhoods in 2012. Much of the analysis of the millions of gallons per day was based off of a 10 year PUC study that did not capture the density of growth over the past five years nor the fact that we have been in a drought. As a result, the review of the plan's impacts on sewage and storm water drainage were said to be less than significant DURING DRY WEATHER. However, during wet weather months, the overflow and its effects on the water treatment capacity are significant. When the wastewater treatment facility is past capacity, sewage/stormwater is strained, mixed with chemical disinfectants and released into the Bay. We would like to see a full analysis of this process, based on the frequency of how often this occurs (how many days per months) during wet weather months and what are the environmental impacts of these waste disinfectants. We would also like to have a detailed cumulative projected analysis of the millions of gallons per year generated annually by construction related projects, and how much that amount (what %) contributes to the overall projected analysis." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.14])*

Response HY-1

The commenter requests the Draft EIR include more detailed analysis related to the combined sewer system during wet weather, and states that the SFPUC study supporting the capacity of the sewer and stormwater system does not capture the density of growth over the past five years or the drought of 2011–2016. The commenter appears to reference SFPUC data in footnote 353, Draft EIR p. IV.I-3, which cites a 10-year decline in wastewater flows due to declining water use from the mid-2000s to 2015. However, water use in San Francisco similarly declined between 2001 and 2010—before the recent five-year drought—by a total of 15.6 percent and

by 18.1 percent per capita, despite a 3 percent increase in citywide population.[85] The Draft EIR analyzed the effects of changes in wastewater and stormwater flows within the Plan Area in combination with citywide growth in Impact C-HY-2 (Draft EIR pp. IV.I-31 through IV.I-35). As discussed in this impact analysis, based on potable water use projections from the SFPUC's 2015 Urban Water Management Plan, citywide wastewater flows could increase by about 18.1 mgd by 2040. Water use projections in the 2015 Urban Water Management Plan are based on citywide growth projected by the Association of Bay Area Governments in 2013, which, as discussed above, are also the basis for other quantitative analysis (e.g., transportation, noise, air quality) in the Draft EIR. Most of the citywide growth would occur within the city's bayside, which is served by the Southeast Water Pollution Control Plant (SEP). With a remaining capacity of 24.5 mgd, the SEP has sufficient capacity to treat the entire citywide increase in wastewater flows during dry weather, as concluded on Draft EIR p. IV.I-33. Furthermore, wastewater flows could be less than projected because individual development projects would be required to comply with San Francisco's Non-Potable Water program, which requires the developers of buildings of 250,000 square feet or more to use non-potable water for toilet and urinal flushing. On-site gray water would be one potential source of non-potable water used for compliance with this program, and reuse of gray water generated onsite would reduce wastewater flows to the combined sewer system.

The effects of changes in wastewater and stormwater flows on combined sewer discharges (CSDs) during wet weather are discussed on Draft EIR pp. IV.I-34 and IV.I-35. As concluded in this analysis, the reduction in stormwater flows as a result of compliance with San Francisco's Stormwater Management Ordinance and the Stormwater Management Requirements and Design Guidelines is expected to offset increases in citywide wastewater flows. Therefore, there would not be an increase in the frequency of CSDs from the combined sewer system during wet weather.

Regardless, as discussed on Draft EIR p. IV.I-35, the SFPUC is implementing the Sewer System Improvement Program (SSIP), a $7 billion, 20-year capital program to proactively address system-wide needs and update the aging combined sewer system. Specific projects planned under the SSIP will improve the management of wet weather flows to the Bayside Drainage Basin of the city's combined sewer system. The Central Bayside System Improvement Project will include improvements to provide redundancy to the Channel force main that transports flows from the Channel Pump Station to the SEP and assist the SFPUC in controlling the number of CSDs from the Bayside Drainage Basin. This project also includes construction of green and gray infrastructure to reduce stormwater flows to the combined sewer system. Improvements to the North Point Wet Weather Facility will include rehabilitation of the outfall to improve its operational reliability, as well as wet weather pump station improvements. Green infrastructure projects in the Channel urban watershed include several measures to manage stormwater before it enters the combined sewer system and reduces the volume of stormwater discharges. These include integration of bioretention planters and permeable pavement into bulb outs along Fell and Oak streets, as well as in the parking lanes and alleys along and adjacent to the Wiggle bike path extending from Market Street to Golden Gate Park. Implementation of these projects would further reduce stormwater flows to the Bayside Drainage Basin, which would contribute to a reduction in CSDs during wet weather.

Implementation of these projects will ensure that frequency of CSDs from the combined sewer system remains in compliance with the SFPUC's National Pollutant Discharge Elimination System (NPDES) permit for the SEP, the North Point Wet Weather Facility, and all of the bayside wet-weather facilities. Planning for the development of

[85] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, pp. 5-2–5-3, http://www.sfwater.org/modules/showdocument.aspx?documentid=9300, accessed August 7, 2017.

these projects by the SFPUC anticipates the effects of droughts and is ongoing. The development of projects under the SSIP does not rely on any one specific study. As such, no additional analysis is required to support the less-than-significant cumulative impact finding under Impact C-HY-2 on Draft EIR pp. IV.I-31 through IV.I-35.

Comment HY-2: Sea Level Rise between Fifth and Sixth Streets Should Be Studied

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

O-VEC.15

"The DEIR identifies that nearly ⅓ of the plan area will be inundated with 3-8 feet of water due to sea level rises. However, the SFPUC is undergoing a plan to address sea level rises that will not be complete until 2018. The idea is to add an adaption plan. However, the Central SoMa plan will begin facilitating new development as soon as it is adopted. We feel as if the impact of the sea level rising between 5th and 6th Street (halfway in the middle of the entire neighborhood) has significant impact that should be studied prior to the adoption of this plan. Many of the community benefits of affordable housing, open space and neighborhood retail were projected to occur in this area, and with rising flood levels, the cost burden on our community would be tremendous." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.15])*

Response HY-2

The commenter requests that the Draft EIR study the effect of sea level rise on the area between Fifth and Sixth streets. The Draft EIR examines the potential for the Plan to exacerbate flood hazard conditions and concludes that the Plan would not. Therefore, in accordance with the *California Building Industry Association v. Bay Area Air Quality Management District* case decided by the California Supreme Court in 2015, CEQA does not require lead agencies to consider how existing environmental hazards or conditions might impact a project's uses or residents.[86] Nevertheless, the effect of potential sea level rise on the entire Plan Area was analyzed on Draft EIR p. IV.I-30 for informational purposes. As shown on Draft EIR Figure IV.I-4, Inundation with 36 Inches of Sea Level Rise plus 100-Year Storm Surge, most of the area bounded by Sixth, Folsom, Fourth, and Townsend streets would be flooded to depths of at least 2 feet with localized areas being inundated to depths of approximately 8 feet. This 36-inch sea level rise is expected as a likely scenario in the year 2100. While the commenter is correct in noting that the SFPUC Action Plan would not be completed until 2018, the Action Plan is the first step in the development of the Citywide Sea Level Rise Adaptation Plan.

The area between Fifth and Sixth streets is included in the portion of the Plan Area, which would have an increased risk of flooding in the future due to sea level rise. As indicated on Draft EIR p. IV.I-30, the Plan includes objectives, policies, and implementation measures intended to "Maximize Flood Resilience." For example, Policy 6.6.1 would develop a sea level rise and flood management strategy for the Plan Area aimed at developing targeted policies and programs to reduce flood risk. Implementation Measures 6.6.2.1 and 6.6.2.2 were created to ensure that new development meets the flood-resistant-building standards of the City's

[86] *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369, December 17, 2015.

Floodplain Management Ordinance and Building Code and to develop and implement Flood Resistant Design Guidelines for representative building typologies in Central SoMa.

Additionally, as noted on Draft EIR p. IV.I-26, capital projects that cost $5 million or more that could be inundated during their lifespan would be required to perform a vulnerability assessment.[87] An adaptation plan would be required for projects that are found to be vulnerable to sea level rise and have a potential for substantial consequences. The adaptation plan would focus on aspects of the project that have the greatest consequences if flooded and would include clear accountability and trigger points for bringing adaptation strategies online and a well-defined process to ensure that milestones are being met and that the latest science and technology are being considered. As described on Draft EIR p. IV.I-11, the State of California Sea-Level Rise Guidance recommends an adaptive management approach, including incorporating risk assessment, for development in areas that may be subject to sea level rise beyond 2050 in recognition of the scientific uncertainty regarding the rate and magnitude of sea level rise.

Therefore, although the Plan would not exacerbate flood risks due to sea level rise and, thus, would not result in an impact under CEQA, the Plan includes policies designed to protect new development from future flooding due to sea level rise. Additionally, pursuant to City policy, certain large-scale capital projects are required to incorporate an adaptation plan into their design and construction. Therefore, the Plan and existing City policy address effects of sea level rise in the Plan Area, and no revisions are required to the Draft EIR.

[87] Capital projects are City projects that are divided into even Service Areas: Economic and Neighborhood Development; General Government; Health and Human Services; Infrastructure and Streets; Public Safety; Recreation, Culture, and Education; and Transportation. The Capital Planning Committee makes recommendations on capital projects to the Mayor and Board of Supervisors regarding capital plans, projects, and funding.

D.13 Other CEQA Considerations

The comments and corresponding responses in this section cover topics in Draft EIR Chapter V, Other CEQA Considerations. These include topics related to:

- Comment OC-1: Gentrification and Displacement
- Comment OC-2: Growth from New Development
- Comment OC-3: Growth-Inducement Analysis
- Comment OC-4: Homelessness

Comment OC-1: Gentrification and Displacement

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

A-CPC-Melgar.1
A-CPC-Richards.2
A-CPC-Richards.4
O-CSN-1.32
O-CSN-1.48
O-FADF.1
O-SOMCAN-Cabande.8
O-SOMCAN-Cabande.13
O-SOMCAN-Cabande.15
O-SOMCAN-Rogge.1
O-UNITE Here.1
O-UNITE Here.3
O-UNITE Here.4
O-VEC.7
O-VEC.12

"…I did want to zero in on Ms. Gomez's comments from HERE. There is -- you know, we're adding jobs, and we're also displacing jobs, I think.

"You know, I remember seeing a study last year of where folks lived in the Mission who work in the hospitality industry. And I think those are the members of HERE. And there are very similar patterns in SoMa, I think.

"Much to my surprise, folks actually still lived in the Mission. And the speculation in the research was that folks actually live close to where they work because they really couldn't afford to commute. Those are the folks who are walking to work and riding their bikes to work who really couldn't afford to pay for BART.

"So as those housing units disappear, it becomes really difficult to have that workforce here. And, you know, we already know the hospitality industry is suffering from not having the workforce. And I think that cuts across all service-industry-related jobs.

"And so I think that replacing with BMR units is not quite the same population that we're trying to serve. And I'm really cognizant that, if we're planning for densifying the Central SoMa, that we have to be really careful about not, you know, causing displacement of folks who live there." *(Myrna Melgar, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Melgar.1])*

"The woman from Local 2 really had some good comments about what kind of jobs are we going to have because South of Market is one of the lowest and poorest neighborhoods in the City along with the Mission and Chinatown. That was done by the -- I think the Federal Reserve.

"And here we have these, you know, high-end -- probably high-wage jobs coming in, and we have to have support jobs that are needed.

"And I'm worried about displacement as well. We hear this all over the place. And I think here probably especially true, given the increase in population. Probably like -- I think it's real, and I want to really understand what the level of housing that's protected, either under rent stabilization or kind of -- what that looks like here, so we're not dropping a neutron bomb in the neighborhood on housing." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.2])*

"But also the price ranges related -- with the housing, which is already I think in short supply, to the level base wage, something SEIU 2 said." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.4])*

"**I. The Plan will have Significant Adverse Displacement Impacts that are not Disclosed or Analyzed in the DEIR.**

"The DEIR erroneously concludes that displacement is not an environmental impact under CEQA. (DEIR, p. V-10). As a result, the DEIR does not analyze this impact. As discussed by Urban Planner Terrell Watt, AICP, the Plan is likely to result in the displacement of large numbers of low and moderate income residents of the Plan area. These residents will be forced to move elsewhere, perhaps replacing short current commutes with long commutes to distant suburbs. This is an environmental impact that must be analyzed under CEQA.

"CEQA requires the lead agency to determine whether the 'environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly,' (PRC § 21083(b)(3), (d)), and to 'take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.' See PRC §21000 et seq.

"CEQA Guidelines Appendix G, Section XII provides that a project will have significant impacts where it will:

- ***Induce substantial population growth*** or concentration of population in an area, either directly (for example, by proposing new housing or businesses), or indirectly (for example, through extension of roads or other infrastructure);
- ***Displace substantial numbers of existing housing*** necessitating the construction of replacement housing elsewhere; or

- ***Displace substantial numbers of people***, necessitating the construction of replacement housing elsewhere. See CEQA Guidelines Appendix G, Section XII.

"Therefore, contrary to the DEIR's position, displacement is an environmental impact that must be analyzed under CEQA. See also, See Kalama D. Harris, Attorney General, 'Environmental Justice at the Local and Regional Level,' May 8, 2012, http://oag.ca.gov/sites/all/files/pdfs/environment/ej_fact_sheet_final_050712.pdf. (Exhibit E).

"Here, the Plan is likely to displace numerous residents and commuters who currently live, work, commute, and recreate in the area. These residents will move to other areas, resulting in longer commutes and suburban sprawl. This impact must be analyzed in a revised DEIR. Mitigation measures should be considered, such as requiring additional low income housing.

"Urban Planner Terrell Watt, AICP, concludes that the Plan will displace low-income current residents. Watt states:

> The Project will inevitably lead to the displacement of low and moderate income residents because of the incentives provided through zoning and other mechanisms for new non-residential development in the Project area. Currently over 10,000 people live in the Central SOMA neighborhood or Project area in approximately 7,800 housing units. These residents are among the most ethically and economically diverse in the City with about 60% of residents people of color.[21] Although the median household income is slightly higher than the City average, the neighborhood has one of the highest levels of poverty with 31% of the population living at or below 200% of the poverty threshold.[22] Yet, the DEIR concludes that the Project (Plan) would not displace a large number of housing units or necessitate construction of replacement housing outside the Plan area finding this impact less than significant. DEIR Appendix B, Initial Study at page 86. The DEIR reaches this conclusion despite acknowledgement that the Project (Plan) could require the demolition of existing housing units within the Plan Area. The basis of the DEIR's conclusion is in short:
>
> > 'From the perspective of the City's housing stock, the loss of housing units as a result of development under the Plan would be offset by the production of up to approximately 13,200 net new housing units (Initial Study page 86) within the Plan area in addition to residential development elsewhere in San Francisco as has been occurring and is expected to occur in the future, in addition to the fees paid for the jobs/housing linkage program and Inclusionary Affordable Housing.' DEIR Appendix B, Initial Study at pages 86-87.

"The Initial Study contradicts this statement at page 85, noting that the project demand for housing created by the Project would be about 19,900 units, far surpassing the potential addition of about 11,700 units projected to be created in the Plan area by 2040. The current Project is projected to produce fewer housing units – approximately 7,500 -- resulting in an even larger gap between new employees in the Project area and new housing units. There is no question the Project will generate a demand for housing beyond that proposed by the Project. A revised DEIR must acknowledge this impact and provide further evidence housing need will be met and where.

[Editor's Note: The preceding three paragraphs are repeated as the first three paragraphs following the bullet at the start of the next comment (O-CSN-1.48). They are not repeated below in the interest of brevity.]

"For these reasons the approach the DEIR takes to analysis of this potential impact falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance."

Footnotes:
[21] SF Dept of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, page 6 (11-30-12).
[22] Id. p. 21

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.32])

- Would the project displace substantial number of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?

[See Editor's Note above in Comment O-CSN-1.32.]

"The Initial Study also argues that the potential number of units that could be displaced by the Project (Plan) **as too speculative** and not necessary to concluding impacts would be less than significant, reasoning that the Plan is intended to promote additional density along with Planning Code requirements for replacement and conservation would offset displaced units, a. DEIR Appendix B, Initial Study at page 87. The number of units or range of units potentially displaced by the Project is not speculative. In fact, the information exists to determine the possible range of housing units in the Project area that could be displaced as demonstrated by detailed modeling supporting the shadow discussion in the DEIR and the equally detailed development scenarios presented in the Financial Analysis. Subsequent development projects that 'would occur under the Plan' listed at pages IV-8 to IV-10 plus cumulative projects listed at IV-11 to IV-12 also provide a basis for determining the potential range of units displaced by the adoption and implementation of the Project.

"For these reasons the approach the DEIR takes to analysis of this potential impact falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance. A revised analysis in a dedicated DEIR section must be completed and recirculated with the following elements:

- A map and text displaying the location, number and affordability (e.g., affordable, deed restricted and senior) housing units in the Project area. This information should disclose the number of affordable units that could revert to market rate due to limited duration of the affordability of those units under agreement or other terms.
- An overlay of proposed zoning indicating potential incentive new development [sic] overlap or conflict with existing housing units.
- An analysis of potential (worst case) displacement of units broken down by market rate, affordable and deed restricted based on the two inputs above. In addition, estimate of the total number of residents potentially displaced.
- Description of how specifically City planning policies and code provisions would result in avoidance (conservation) or replacement of units displaced by new development and neighborhood gentrification due to a likely rise in the number of high income wage earners occupying the new jobs.

"The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. In this case, it is clear the Project will displace housing in the Project area. The revised DEIR must address how much, where and whether housing displaced is affordable or serving special needs. The revised DEIR must also describe specifically how these units will be replaced if displaced and where. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must

identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. See above discussion of feasible mitigation measures that should be considered in a revised DEIR."

Footnotes:
[21] SF Dept of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, page 6 (11-30-12).
[22] Id. p. 21
[23] The Central SOMA Plan would create only 7,500 housing units.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.48])

"We appreciate the Planning Department's support of SOMA Pilipinas – SF's Filipino Cultural Heritage District. As you know, the Central SOMA Plan includes half of SOMA Pilipinas, and some of the most important cultural assets in our cultural district including the Gran Oriente Filipino Masonic Lodge in South Park which is a historic site, the Filipino Education Center, the Lapu Lapu Mural, Bonifacio Mabini, Tandang Sora, and Rizal Streets, the Mendelson House and San Lorenzo Ruiz Center and many other buildings and alleyways that is home to the Filipino community. We also appreciate the SF Planning Department's commitment to working on the landmark designation of Filipino historic sites in San Francisco as part of SF's Historic Preservation program.

"However, we are concerned that the Central SOMA rezoning will have significant impacts not only on our neighborhood and streets in the zoning area, but also in the immediate area which comprise the rest of our cultural district in regards to traffic, pedestrian safety, increased real estate value, and corresponding pressure and negative impacts on the affordability of housing and rental space for community serving non-profits and small businesses.

"Many of the long time Filipino community members who currently reside in the Central SOMA are seniors on fixed income and working families who are vulnerable to rising rents and eviction. Like our Manongs and Manangs in the I-Hotel they have felt the pressures from the tech boom and fear that with the rezoning and building of so many more office space, it will mean their eventual displacement.

"One of the main goals of SOMA Pilipinas is the preservation and stabilization of the long-standing Filipino community and we ask you to look at the impact of this rezoning on the vulnerable populations of Central SOMA, not just the Filipinos but also all of our long-time friends and neighbors in the SROs and apartment buildings." *(Bernadette Sy, Filipino-American Development Foundation, Letter, February 13, 2017 [O-FADF.1])*

[Editor's Note: The preceding comment is repeated as Comment O-SOMCAN-Rogge.1 and is not reproduced a second time in the interest of brevity.]

"**5. The Economic Impacts From Displacement Were Not Analyzed in the DEIR**

"Regardless of the assertions in the DEIR, there are environmental impacts due to displacement of residents from their homes or small businesses in SoMa, especially when considering the huge increase in 'Vehicle Miles Traveled' that will result with this proposed Central SoMa Plan.

"There are several ways that the Central SoMa Plan encourages displacement in an area already suffering from increased no-fault evictions and skyrocketing rents. A UC Berkeley study in collaboration with UCLA shows

that SoMa is undergoing 'advanced gentrification.'[7] Gentrification happens when more affluent people replace less wealthy people. The DEIR encourages luxury, high end housing in SoMa, which in turn encourages the price of other housing to increase. Landlords of adjacent properties begin to charge more rent to cash in on the new populations in the nearby luxury condos or new high-end shops.

"The DEIR upzones large swaths of Central SoMa. Upzoning of property increases the values of the underlying land, which leads to increased costs for residential and commercial tenancies and increased sale prices. Therefore existing residents or small businesses that are paying less than the new market rate will be forced out. Upzoning incentivizes tearing down existing housing and existing small businesses so that developers can maximize the new build-out potential of that property. Coupled with the relaxing of local controls and push to have less local approval hearings, there will be less incentive for developers to provide 'right to return' or provide increased levels of affordability to existing residents or businesses that will be forced out when the buildings are torn down.

"There are no new protections being implemented by the DEIR for existing tenants and community serving institutions and businesses. Other than the push to preserve certain historic areas and buildings, there are no new protections in place to prevent displacement that the City knows will occur due to the new development that will be incentivized by this Central SoMa Plan (as exhibited in Plan Bay Area 'Communities of Concern'). As shown in a University of California Berkeley report on transit oriented development and gentrification[8,9], areas in the Bay Area that have convenient access to transit are areas most likely to suffer gentrification and displacement, including SoMa.[10] The Central SoMa Plan talks about increasing land values as a primary reason for the underlying elements of the Central SoMa Plan, yet it does not adequately take into account the fact that increased land values cause speculation and displacement. The increased land values presented in the Central SoMa Plan's various 'menu' options is a recipe for massive displacement of existing residents and small businesses.

"Large-scale displacement creates a significant environmental impact when considering CEQA's 'Vehicle Miles Travelled' standard. Working class and lower income households get displaced outside San Francisco and their commutes increase, increasing their 'Vehicle Miles Travelled.' When people who work in SoMa are displaced, they will often retain their employment in SoMa, therefore their 'Vehicle Miles Travelled' will increase. Many existing residents in SoMa can not afford the luxury homes that are and will be built in SoMa and access to affordable housing is extremely limited, so if for any reason they need to move out, it's highly unlikely they will move be able to stay in the neighborhood.

"Furthermore, much of the luxury housing that gets built doesn't provide housing even though it's approved by Planning to be residential housing units. When these units are used as 'pied-a-terres' or 'short term rentals' or 'corporate rentals' or 'student housing', they are not helping to alleviate any housing shortage, because although they are approved by Planning as residential use, they are not in fact used for residential purposes. Therefore people are being displaced and commuting farther for work, meanwhile the new housing units aren't necessarily supporting residents being able to live in homes close to their work.

"Replacing low income residents with higher income residents replaces a population with lower car ownership with a population that has a higher rate of car ownership.[11] [12] More affluent people are also more likely to use ride-hailing/TNC services than public transit. They have access to the smartphone-based apps and can pay more for a ride than public transit riders. This puts more single vehicles on the road that are idling and circling in

their competition for fare-paying customers. There are also tech shuttles that service SoMa residents to take them to their offices on the Peninsula. The impacts of the increased 'Vehicle Miles Travelled' caused by the new, more affluent populations which is encouraged in the DEIR is not considered in the document.

"This means that gentrification has a 'quadruple' environmental impact by lengthening the commute times of people working in SoMa from their new place of residence outside of San Francisco; replacing these people with a population more likely to own and use automobiles; increasing the number of people living in SoMa as a 'bedroom' community for their commute on a shuttle to the Peninsula; and increasing use of ride-hailing/ TNC services whose vehicles constantly idle and circle in competition for rides. None of these impacts of gentrification on the environment have been studied, which a significant flaw in the DEIR."

Footnotes:

[7] http://www.urbandisplacement.org/map/sf

[8] http://ucconnect.berkeley.edu/transit-oriented-development-and-commercial-gentrification-exploring-linkages

[9] http://www.urbandisplacement.org/map/sf

[10] http://communityinnovation.berkeley.edu/reports/Gentrification-Report.pdf

[11] http://socrates.berkeley.edu/~raphael/BerubeDeakenRaphael.pdf

[12] http://www.sciencedirect.com/science/article/pii/S0965856400000185

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.8])

"**10. There is No Proof that the Plan will Accomplish its Goal of Alleviating Housing Prices or Maintaining a Diversity of Residents**

"The Plan states as one of its main goals accommodating housing demand and addressing such demand to alleviate housing prices. The Plan, however, does not provide any studies or figures that support the claim that new development will drive down housing costs. As a result, the goal of the Plan of maintaining the diversity of residents, here in terms of socioeconomic makeup, appears empty. The Plan would cause a greater increase in the number of people living and working in the area than would be seen without the Plan, as shown in the DEIR. As the DEIR states on page V-10, 'what effect development under the Plan would have on housing affordability is a matter of considerable controversy,' and that 'the influx of real estate investment and higher income, residents may increase gentrification of a neighborhood, with displacement of households being a negative outcome.'

"Further study must be done regarding what effects new housing development will have on housing prices if the Plan is serious about its commitment to maintaining a diversity of residents in the area. If new housing development under the Plan -- the majority of which is market-rate -- cannot be proven to bring down housing prices, the Plan will then only work to exacerbate the gentrification and displacement crisis in the area. Studies must be done to address these facts if the Plan is to move forward in meeting its core goals, especially as they relate to affordability and maintaining a diversity of residents." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.13])*

"**12. The Plan Does Not Address the Stabilization of SoMa based Non-Profit Organizations**

"The Central SoMa Plan has no provision for stabilizing nonprofit organizations in the neighborhood. As studied by Supervisor Kim, MOHCD, and the Northern California Community Loan Fund, the escalation in

property values, and the lack of commercial rent control has put nonprofit organizations at imminent risk of displacement.[18,19]

"By encouraging the construction of a second financial district, commercial rents will become increasingly more expensive placing nonprofit organizations even more at risk. Low income and immigrant communities in So Ma rely on many of these nonprofit organizations for basic services and to be able to survive in the community. Without these organizations, SoMa residents will be further at risk for displacement.

"As noted elsewhere in this letter, displacement does result in environmental impacts. Therefore, the DEIR is deficient in that it does not recommend strategies for stabilizing nonprofit organizations in SoMa."

Footnotes:
[18] https://www.ncclf.org/npdmitigation/
[19] https://sfgov.legistar.com/View.ashx?M=F&ID=2730532&GUID=77CFF0CE-7AC6-4569-ACEE-02568711018F

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.15])

"Thank you so much for your support of our Filipino Cultural Heritage District."

[See Editor's Note above in Comment O-FADF.1.]

(Andrew Rogge, South of Market Community Action Network (SOMCAN), Hearing Transcript, January 26, 2017 [O-SOMCAN-Rogge.1])

"We have general concerns about the plan. I'll only touch briefly on concerns about incentivization for displacement of SRO residents who live in the DEIR -- in the Central Plan Area and are urging that further study be done of what the impact of all this up-zoning may be and what incentives will get created." *(Cynthia Gómez, UNITE Here, Local 2, Hearing Transcript, January 26, 2017 [O-UNITE Here.1])*

"We think there should be an analysis and breakdown of the kinds of jobs that are projected to be created by this Plan and specifically by income level and wage. And also of the kinds and types of housing, the price range of these types of housing and, in particular, the kind of family-friendly housing that may be expected to be created, especially in light of recent analysis that there is a terrible shortage of family-friendly housing in San Francisco. In particular, the greenhouse gas analysis, traffic analysis, and public transportation demand analysis should all be redone in the light of this more detailed study." *(Cynthia Gómez, UNITE Here, Local 2, Hearing Transcript, January 26, 2017 [O-UNITE Here.3])*

"And, finally, we also -- as I mentioned, there are concerns about displacement in terms of residents and particularly vulnerable groups. We're also concerned that the structure of this Plan incentivizes creation of a great deal, at least 67 percent, of high-end market-rate housing, many of which ends up as second housing or investment properties, which then, in turn, very often end up advertised as illegal short-term rentals." *(Cynthia Gómez, UNITE Here, Local 2, Hearing Transcript, January 26, 2017 [O-UNITE Here.4])*

"E. Office Space and Housing

Office:

The DEIR indicates that Central SOMA Plan corresponds to the Plan Bay Area's planning in which it estimates "approximately 92,000 additional housing units and 191,000 additional jobs would be added in San Francisco by 2040" (II-4), however Plan Bay Area also indicates it "also does not mandate any changes to local zonings, general plans and project review"[2]. VEC is very concern that this plan will create a second Financial District and that much of the regional growth will be very much concentrated within the area plan, from 2nd St to 6th St, rezoning of, including but not limited, to residential areas into office developments. The DEIR did not mention how the rezoning will impact the residential areas into office developments as seen in Figure II-3 where there are areas specifically starting from 3rd St and Folsom St to 6th St and Folsom St are homes to our clientele e.g the San Lorenzo Ruiz Center. The DEIR did not also map the current affordable housing buildings within the area plan. This analysis should be included in the DEIR and how those current residents will be impacted into the rezoning of this area."

Footnote:
[2] http://mtc.ca.gov/sites/default/files/0-Introduction.pdf

(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.7])

"Although DEIR mentioned numerous areas of controversies that need to be resolved such as potential displacement to residences and businesses or its socioeconomic impacts, it did not exactly incorporate the potential socioeconomic impacts to be preventative. As the DEIR explains that the Central SoMa Plan is in accordance to Plan Bay Area goals, there are situations in the neighborhood that are already problematic and that Central SOMA Plan may fail to address the exacerbating displacement and affordability crisis. For example, South of Market are already seeing conversions of SROs into co-op for housing for tech workers. The DEIR fails to address the practices or scenarios that are already prominent in the neighborhood that leads to greater displacement and homelessness." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.12])*

Response OC-1

Some of the comments about gentrification and displacement address the Plan and its merits, and include the following:

- Concerns that the Plan would result in displacement of existing service jobs within the Plan Area by high-wage jobs or existing residents within the Plan Area by "high-end" housing, and a corresponding disjunction between workers presently living in the Plan Area and new jobs that would be developed under the Plan;
- A request for clarification regarding the level of housing that would be "protected" under the Plan within the Plan Area, by rent stabilization or other means;
- Concerns that the Plan encourages the development of luxury and/or high-end housing in the Plan Area, which would have the effect of increasing the price of housing on adjacent properties, increasing costs

for residential and commercial tenants, accelerating residential and commercial displacement, and eliminating incentives for developers to produce more affordable housing;

- Concerns that housing that would be developed within the Plan Area would not alleviate the effects of the housing shortage because the housing would be used as short-term rentals, corporate rentals, or student housing;
- Concerns that the Plan would create a second financial district by converting residences into office developments, thereby displacing residents;
- A request to map affordable housing buildings in the Draft EIR;
- Concerns that the Plan would not accomplish the goals of alleviating housing prices or maintaining a socioeconomic diversity of residents;
- Concerns that the Draft EIR does not address existing conditions resulting in displacement, such as conversion of single-room-occupancy (SRO) residential buildings into co-op for housing for tech workers;
- Concerns that escalation in property values and a lack of commercial rent control could displace nonprofit organizations that low-income and immigrant communities rely upon for basic services, putting these communities at further risk for displacement; and
- Concerns regarding the preservation and stabilization of the longstanding Filipino community in the Plan Area (displacement).

These comments do not address the adequacy or accuracy of the Draft EIR. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. Specifically concerning the comment regarding the loss of SRO units under existing conditions, the Draft EIR addresses effects of the proposed Plan and not of existing conditions. It is noted, however, that the Planning Department and Department of Building Inspection have a number of open enforcement cases, both in the Plan Area and elsewhere in the city, regarding potentially unlawful conversion of residential hotels or other residential uses to short-term or group housing use.[88]

Other comments about gentrification and displacement address the environmental impact analysis in the Draft EIR. These include:

- Concerns that environmental impacts related to gentrification and displacement of residents and small businesses were not analyzed in the Draft EIR;
- Displacement resulting in impacts related to traffic (an increase in VMT);
- A request that the greenhouse gas analysis, traffic analysis, and public transportation analysis in the Draft EIR be re-done to account for a breakdown of the kind of jobs projected to be created by the Plan, by income level and wage, as well as by the kinds and types of housing; and
- General concerns about the Plan's effects on traffic and pedestrian safety in the Filipino Cultural Heritage District.

[88] The Residential Hotel Unit Conversion and Demolition Ordinance (HCO), Chapter 41 of the San Francisco Administrative Code, adopted on June 26, 1981, seeks to preserve affordable housing by preventing the loss of residential hotel units through conversion or demolition, and to prevent the displacement of low income, elderly, and disabled persons.

Environmental Impacts Resulting from Gentrification and Displacement

The focus of CEQA is on *physical* environmental impacts, such as impacts of a project on air quality, water quality, or wildlife habitat. In general, socioeconomic effects are beyond the scope of the CEQA environmental review process unless a link can be established between anticipated socioeconomic effects of a proposed action and adverse physical environmental impacts (CEQA Guidelines Section 15131(a), CEQA Section 21082.2). To establish this link with respect to the Plan, a two-part analysis is necessary. The first part would examine whether the Central SoMa Plan would *cause* additional gentrification[89] and displacement[90] at a level over and above what would occur without adoption of the Plan. If the analysis determines that the Plan would cause or contribute to gentrification or displacement effects, the analysis must then consider a second question—would the economic or social effects attributable to the Plan result in a significant adverse physical impact on the environment?

The Draft EIR conducted this two-part analysis to determine whether the Plan would result in indirect displacement above levels that would occur without the Plan. The Draft EIR addresses concerns related to gentrification and displacement on Draft EIR pp. V-7 to V-10. The Draft EIR finds that the Plan would increase the capacity for jobs and housing. Specifically, "Goals 2 and 3 address the socioeconomic concerns related to PDR jobs and affordable housing by (a) protecting PDR space within the Plan Area and the larger SoMa area while also allowing for a substantial amount of new office jobs and (b) setting affordability requirements for the Plan Area in an effort to ensure that 33 percent of new housing is affordable to very low, low, and moderate income households" (Draft EIR, p. V-9). The EIR concludes that, "There is no evidence that the Plan would result in potential social and economic effects that would indirectly result in significant effects to the physical environment and are therefore beyond the scope of this EIR. Changes to the physical environment as a result of the Central SoMa Plan are addressed in the appropriate environmental topics in this EIR and the accompanying Initial Study (Appendix B)" (Draft EIR, p. V-10). Thus, the EIR did analyze the potential for the Plan to result in social and economic effects that could in turn result in environmental effects. With regard to addressing the effects of the Central SoMa Plan on gentrification and displacement, the Planning Department is informed by a socioeconomic analysis conducted as part of a response to a CEQA appeal of a project located at 2675 Folsom Street. Additional information from this study is provided below.

The Central SoMa Plan Area is within the larger area of the Eastern Neighborhoods area plans, in which the 2675 Folsom Street project is located. As part of its appeal response, the Planning Department conducted a review of the relevant academic literature to evaluate whether gentrification and displacement of existing residents or businesses could be attributed to market-rate residential and mixed-use development. This study is incorporated by reference herein in its entirety and represents the Department's findings. [91] The study was directed by the Planning Department, including development of the scope of work, and review of the report for

[89] *Gentrification* is a process associated with increased investment in existing neighborhoods and the related influx of residents of higher socioeconomic status and increased property values.

[90] *Displacement* refers to the process by which businesses and households are forced to move. Two types of displacement may occur: (1) direct displacement, such as demolition of a building; and (2) indirect displacement, such as increased rents driving households to move.

[91] San Francisco Planning Department, *Planning Department Response to the Appeal of Community Plan Exemption for 2675 Folsom Street Project*, Case No. 2014.000601ENV, March 13, 2017. See also a memo to the Board of Supervisors, "ARB|Chapple Study and Planning," May 2, 2017, *https://sfgov.legistar.com/View.ashx?M=F&ID=5147164&GUID=A02B19F7-5F3F-43AD-8DC7-347EB15FAD11*, accessed March 12, 2018.

accuracy, objectivity and completeness. The study concluded that the literature does not establish empirical evidence supporting the position that market-rate development is responsible for residential or commercial displacement. The study cites a 2016 case study analysis in New York City, which indicates that "displacement is no more prevalent in the typical gentrifying neighborhood than in non-gentrifying neighborhoods."

The study also concluded that the relevant literature indicates that new housing production does not result in increased costs of the existing housing base, but instead helps maintain existing home prices and rents. The study also concluded that new housing production suppresses price appreciation and has the effect of actually reducing housing displacement (although the rate at which this occurs in small, localized areas requires further analysis). Another way of describing these findings is that construction of both new market-rate and new affordable housing has an attenuating effect on housing displacement on a relatively large scale (larger than the census block group level, for example). As described in the study, the Planning Department undertook further research to examine whether market-rate development has caused displacement at a finer-grained scale (such as at the census tract level) between 2000 and 2015, and it found no evidence to support such a displacement effect. In addition, the Program EIR for the Eastern Neighborhoods area plans concluded that by increasing housing supply relative to demand, more housing choices, and more (relatively) affordable housing units would be developed than without the rezoning, and that the Inclusionary Affordable Housing Program would require below-market-rate units to be developed in conjunction with market-rate projects.[92]

In addition, an economic analysis included in the Planning Department's study evaluated the specific effects of development anticipated under the Eastern Neighborhoods rezoning and area plans on retail supply and demand within the neighborhood surrounding the 2675 Folsom Street project.[93] The results of this analysis indicated that demand for new retail services generated by new residential development within the study area would not result in substantial pressure on the existing retail base in the area.

The Eastern Neighborhoods study determined that gentrification and displacement would take place within the planning area, but that displacement effects would be *more* severe without the land use changes encouraging the development of more housing, as envisioned in that Plan. It is similarly reasonable to assume that gentrification could also take place within the Central SoMa Plan Area after implementation of the Plan, and, as the Initial Study acknowledges, some housing units would likely be demolished under implementation of the Plan, resulting in displacement of housing. While development under the Plan might result in the demolition of a small number of housing units, removal of housing units is strictly regulated and highly discouraged under Planning Code Section 317. As stated on Initial Study p. 87, Section 317 also requires replacement of demolished residential buildings. Accordingly, the Plan would result in a substantial net increase of housing units in the Plan Area. In addition, one of the main goals of the Plan is to create affordable housing; to that end, the Plan is expected to result in the creation of affordable housing at a rate of approximately 33 percent of total units produced after Plan adoption, as opposed to the current inclusionary housing rate, which varies between 12 percent to 33 percent for projects with an environmental application filed after January 12, 2016.

Draft EIR p. V-10 states, "what effect development under the Plan would have on housing affordability is a matter of considerable controversy." By the same token, it is not possible at this stage of the planning process to

[92] San Francisco Planning Department, *Eastern Neighborhoods Rezoning and Area Plans Final EIR*, Case No. 2004.0160E, August 7, 2008, *http://sf-planning.org/sites/default/files/FileCenter/Documents/3991-EN_Final-EIR_Part-1_Intro-Sum.pdf*, accessed March 12, 2018.
[93] ALH Urban & Regional Economics, "Socioeconomic Effects of Market-Rate Development on the Calle 24 Latino Cultural District," pp. 41-110.

determine with certainty the extent and nature of new housing or commercial uses that would be constructed under the Plan, or the nature or extent of displacement that could occur as a result. The Plan proposes broad zoning controls that allow for multiple types of uses. The Planning Department predicted the type of development that would occur based on reasonable assumptions detailed in the Overview section of the Draft EIR, pp. IV-4 to IV-7. As specific development proposals are introduced for sites within the Plan Area, these projects will be subject to public review and environmental analysis in accordance with CEQA at the time they are proposed, as applicable. It would be speculative at this stage to attempt to predict in the Draft EIR the exact nature of development within the Plan Area, and CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145). Regardless, as discussed above, existing evidence does not indicate that development of new housing and commercial uses within the Plan Area would lead to gentrification and displacement at a rate greater than would otherwise occur and instead indicates that such development could help result in the maintenance of existing home prices and rents, as well as in the suppression of home price appreciation. As such, the second paragraph under the heading "Housing" on Draft EIR p. V-10 is revised as follows (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

> The City Office of the Controller – Office of Economic Analysis determined that new market-rate housing in San Francisco has the effect of lowering, rather than raising, housing values at the local and citywide level.[413,414] Research also indicates that at the regional scale, producing more market-rate housing will result in decreased housing prices, and reduce displacement pressures (although not as effectively as subsidized housing). However, at the local level, market rate housing would not necessarily have the same effects as at the regional scale, due to a mismatch between demand and supply.[415] ~~The influx of real estate investment and higher income, residents may increase gentrification of a neighborhood, with displacement of households being a negative outcome.~~ The Central SoMa Plan could, however, help ameliorate pressure on housing prices ~~alleviate this effect~~ through policy goals aimed at ensuring that 33 percent of new housing in the Plan Area is affordable to very low, low, and moderate-income households.
>
> **Footnotes:**
> [413] City and County of San Francisco, ~~City~~ Office of the Controller – Office of Economic Analysis, *Potential Effects of Limiting Market-Rate Housing in the Mission*, September 10, 2015.
> [414] The analysis further determined that locally imposing limits on market-rate housing in the city would, in general, place greater upward pressure on city housing prices, and reduce affordable housing resources to a greater extent than if no limit on market-rate housing were imposed.
> [415] Berkeley Institute of Governmental Studies (IGS), *Housing Production, Filtering and Displacement: Untangling the Relationships*, May 2016.

Regarding concerns that the Plan will create a second financial district by converting residential areas—in particular, areas that are largely occupied by affordable housing—into areas of primarily office development, which could lead to displacement of existing residents, many of them lower-income, Draft EIR p. II-8 states that the Plan would actually retain existing zoning that supports capacity for new housing, as well as for new employment. The Plan would increase the proportion of the Plan Area where new housing would likely be developed by eliminating the Service/Light Industrial (SLI) Use District, which permits only 100 percent affordable housing, and rezoning existing SLI areas as Mixed Use Office (MUO), which permits office and residential development as principal uses, along with a limited amount of retail space.

The Draft EIR also states that the Plan would replace existing zoning that restricts capacity for residential and commercial development with zoning that supports capacity for new jobs and housing. In particular, the allowance of office uses under the zoning proposed in the Plan along Folsom Street from Third to Sixth streets

would not necessarily lead to the displacement of affordable residential uses because the height limits would generally remain unchanged in this area, thereby reducing the incentive for redevelopment pursuant to the Plan. The primary exception is the north side of Folsom Street between Fourth and Fifth streets, where the height limit on most of the block frontage would increase from 55 feet to 130 feet, and from 130 feet to 160 feet at the corner of Folsom and Fourth streets. However, most of this block face is non-residential, and the 160-foot height limit at the corner of Fourth and Folsom streets is proposed on a site where affordable housing is also proposed for development atop the planned Central Subway Moscone Center Station. It is also noted that most of the existing affordable housing buildings in this area are owned by nonprofit providers of affordable housing and are, therefore, not at risk of conversion to other uses.

Effects of the Plan on VMT Arising from Gentrification and Displacement

Comments addressing growth-inducing impacts and vehicle miles traveled (VMT) state that an increase in VMT could occur under the Plan if lower-income workers are displaced from the area and are required to commute further, or could occur as more affluent residents who own cars, who use ride-hailing services, or who travel in commuter shuttles displace lower-income residents who drive less and who use ride-hailing services less frequently. As noted above, the determination of whether a socioeconomic impact would result in an adverse effect on the environment is a two-part analysis. The first part examines whether the Plan would result in gentrification or displacement over and above what may already be occurring in the Plan Area, and the second part determines if that gentrification or displacement would result in an adverse environmental impact. As also noted above, the Planning Department conducted this analysis in response to a CEQA appeal for a market-rate residential project at 2675 Folsom Street. That analysis determined that market-rate development did not cause gentrification or displacement. Nevertheless, the analysis went on to address the second question—even if the project at 2675 Folsom Street were to result in gentrification or displacement, is there evidence that such gentrification and displacement would result in adverse environmental effects? The analysis concluded that local and regional transportation modeling, census data, and traffic counts at representative intersections did not support the claim that increased commute distances by displaced workers, increased vehicle use and VMT from higher income individuals, or increased use of ride-hailing services are causing significant cumulative transportation impacts beyond those anticipated under the Eastern Neighborhoods EIR.

Many factors affect travel behavior, including land-use density and diversity, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. Typically, low-density development located in areas with poor access to non-private vehicular modes of travel (i.e., transit) generates more automobile travel compared to development located in urban areas, where a higher-density mix of land uses and travel options other than private vehicles are available. Given these factors, San Francisco has a lower ratio of VMT per household than the San Francisco Bay Area regional average.

The San Francisco County Transportation Authority uses the SF-CHAMP model to estimate VMT by private automobiles and taxis for different land use types. The SF-CHAMP model assigns all predicted trips within, across, and to or from San Francisco onto the roadway network and the transit system by mode and transit carrier for a particular scenario. Based on the model inputs, which include development in the Planning Department's pipeline, both regional average and local San Francisco VMT are expected to decrease in the future.

Regardless of the model assumptions, some households will move from San Francisco and have increased commute distances, while others may change jobs and have decreased commute distances. However, the model indicates that overall aggregate regional growth is expected to reduce the average distance that a typical worker travels between home and work. The Transportation Authority estimates that existing average VMT per household is 17.2 for the region. VMT per household is expected to decrease to 16.1 for the region by 2040.[94] Employment data show that the share of Bay Area residents living more than 10 miles from their employer increased from 2004 to 2014; over the same period, the absolute number of individuals living more than 10 miles from their employer increased. As such, a larger number of individuals are likely driving alone to work across longer distances. This does not, however, translate into a higher share of individuals driving alone to work; the regional drive-alone commute mode share is at its lowest point since 1960, based on census data. The Draft EIR anticipates traffic impacts due to increased vehicle trips associated with population growth.

The comment contends that gentrification and displacement are also resulting in increased traffic and related impacts because higher income correlates with higher private car ownership and driving rates. However, the claim that development under the Plan would result in higher rates of use of personal vehicles, ride-hailing services, or employee shuttles that would lead to an increase in VMT is not supported by the available evidence. With regard to personal vehicle use, a study of the Mission district between 2000 and 2014 conducted by the Planning Department indicated that, although median annual household income in the district increased substantially during this period (from $67,000 to $74,000), automobile availability on a per capita basis did not increase over the same period.[95] Similarly, the share of Mission residents commuting to work by driving alone also remained steady during this period. Review of comparable data for the census tracts that comprise most of the South of Market neighborhood west of Third Street—and, thus, most of the Plan Area—shows an even greater increase in income between 2000 and 2016, particularly in the eastern and southern portion of the neighborhood, with average household income overall having more than doubled and median household income having also more than doubled, except in the northwestern portion of SoMa. Auto ownership increased area-wide, with the percentage of households without access to a car having declined from 66 percent to 58 percent. Despite these changes, the percentage of workers who live in SoMa and drive alone to work declined slightly between 2000 and 2016, from 20 percent to 18 percent. Under implementation of the Plan, population in the Plan Area is anticipated to increase, resulting in an increase in vehicles and more people driving alone compared to baseline conditions; however, the Draft EIR transportation impact analysis (presented in Section IV.D, Transportation and Circulation) accounts for this growth in its discussion of potential impacts. Moreover, this does not mean that the share of people driving alone would increase; on the contrary, Draft EIR Table IV.D-3, p. IV.D-34, shows that the percentage increase in people traveling by transit and other non-auto modes would increase by a greater amount than would the share of trips by auto, meaning the share of trips by driving would decrease.

With regard to the use of commuter shuttles, studies conducted by the San Francisco Municipal Transportation Agency (SFMTA) in 2016 concluded that the regulated use of commuter shuttles in the city would not have significant environmental impacts, and that the availability of commuter shuttles in fact reduces regional VMT.[96]

[94] Schwartz, Michael, and Drew Coper, *Quantification of Impacts under CEQA following New Guidelines from the Governor's Office of Planning and Research*, February 2016. Kosinski, Andy, *VMT Analysis for 2675 Folsom Street*, Case No 2014-000601, April 2016.
[95] San Francisco Planning Department, *Planning Department Response to the Appeal of Community Plan Exemption for 2675 Folsom Street Project*, Case No. 2014.000601ENV, March 13, 2017.
[96] San Francisco Planning Department, Case No. 2015-007975ENV, October 22, 2015.

Concerning TNCs, many observers report that such services have increased traffic volumes in San Francisco. However, there is limited information as to how TNCs affect travel behavior (that is, whether people using these services are making trips they would not otherwise make, or substituting a TNC ride for a trip they would make by another mode, such as private auto, transit, taxi, walk, etc.). The U.S. Census Bureau and other government sources do not currently include TNC vehicles as a separate travel mode category when conducting survey/data collection; thus, little can be determined from these standard transportation industry travel behavior data sources. The transportation study performed as part of the analysis related to the 2675 Folsom Street project, while not counting TNC vehicles specifically, did not find levels of congestion at studied intersections higher than levels projected by the Eastern Neighborhoods EIR (and in many cases, congestion levels were lower than anticipated when the Eastern Neighborhoods EIR was certified in 2008). For further discussion on TNCs, refer to Response TR-7, p. RTC-151.

These conclusions regarding displacement are generally borne out by a recent U.C. Berkeley study by the same authors whose work is cited by one of the commenters. In "Developing a New Methodology for Analyzing Potential Displacement," prepared for the California Air Resources Board and California Environmental Protection Agency, researchers confirm that that transit-oriented neighborhoods in general are seeing significant gentrification and displacement of lower- and middle-income households in both the Bay Area and Los Angeles. However, while the study concludes that there is a positive correlation between proximity to rail transit and gentrification, there is little evidence showing that new residential development is causing displacement of existing resident.[97] Moreover, "a policy that reduced market-rate housing development in locations that encourage lower auto use, even if the policy reduced displacement and preserved affordable housing, would likely result in a net regional increase in VMT compared to a policy that increased the production of (dense) housing near transit."[98]

In summary, comments contending an increase in VMT could occur under the Plan are not supported by substantial evidence. As such, no revisions to the Draft EIR are required.

Analysis of Plan Effects Based on a Detailed Breakdown of Types of Jobs and Housing

One comment requested that the greenhouse gas analysis, traffic analysis, and public transportation analysis in the Draft EIR be re-done to account for a breakdown of the kind of jobs projected to be created by the Plan, by income level and wage, as well as by the kinds and types of housing.

As discussed above, the San Francisco County Transportation Authority uses the SF-CHAMP model to assess traffic and transportation impacts. This model assigns all predicted trips within, across, and to or from San Francisco onto the roadway network and the transit system by mode and transit carrier for a particular scenario. For example, the 2040 SF-CHAMP model run assigns trips to and from each of the 981 transportation analysis zones across San Francisco based on the land use development that is projected. Trips that cross

[97] Karen Chapple and Anastasia Loukaitou-Sideris, "Developing a New Methodology for Analyzing Potential Displacement," prepared for the California Air Resources Board and California Environmental Protection Agency, ARB Agreement No. 13-310; April 26, 2017, *https://www.arb.ca.gov/research/apr/past/13-310.pdf*, accessed July 27, 2017.
[98] Ibid., p. 180.

San Francisco but do not have an origin or destination in the city are projected using inputs from the regional transportation model. SF-CHAMP models travel behavior based on the following inputs:

- Projected land use development (based on the Planning Department's pipeline) and population and employment numbers—as provided by the Planning Department, based on the Association of Bay Area Governments (ABAG) Projections (currently the Projections 2013 Sustainable Communities Strategy);
- Observed behavior from the California Household Travel Survey 2010–2012;
- Census data regarding automobile ownership rates and county-to-county worker flows; and
- Observed vehicle counts and transit boardings.

Neither SF-CHAMP nor the regional travel model[99] explicitly link workers living in one area with jobs in another area; this level of analysis is generally considered to be more fine-grained than is appropriate for regional travel forecasts. Instead, household-job links are established using existing research on typical commute patterns and distances, including the distribution of workers living in a given area who travel longer distances to work, and so forth.[100] Based on the model inputs, which as noted above include development in the Planning Department's pipeline, both regional average and local San Francisco VMT are expected to decrease in the future.

Regarding the greenhouse gas analysis in the Initial Study (Draft EIR Appendix B), as stated on p. 96, adoption and implementation of the Plan would not directly result in greenhouse gas emissions, although implementation of subsequent development projects in the Plan area would indirectly result in greenhouse gas emissions. However, the Plan includes goals and objectives that would apply to development within the Plan Area, and these policies are generally consistent with the City's Strategies to Address Greenhouse Gas Emissions. As stated on Initial Study p. 96:

> The Plan would support reductions in [greenhouse gas] GHG emissions by providing for additional medium- to high-density mixed-use development in an area with an extensive array of transit service and would expand non-auto modal (e.g., bicycle and pedestrian) facilities. With regard to the GHG reduction sectors listed in the City's Strategies to Address Greenhouse Gas Emissions (i.e., Transportation, Energy Efficiency, Renewable Energy, Waste, and Environment/Conservation), many of the Plan objectives would reduce GHGs resulting from transportation, by increasing more flexible zoning and designated growth-oriented zoning locations, to allow for the creation of a more "transit-rich area" and enhance worker-access to jobs (through workplace growth), and by maintaining a diversity of land uses, increasing levels of affordable housing, and where appropriate, increasing building densities. Other objectives encourage adaptive building reuse and infill development. Additionally, a series of transportation improvements are also planned that would directly discourage auto-oriented uses of the Plan area, and encourage the use of transit and other non-auto modes.

The Initial Study also explains that San Francisco has implemented regulations to reduce GHG emissions specific to new construction and renovations of both private and public projects, and the City's sustainable policies have resulted in the measured reduction of annual GHG emissions. Additionally, San Francisco has met Assembly Bill 32's GHG reduction goals for the year 2020, and the City's GHG reduction goals are consistent with, or more aggressive than, the state's long-term goals. Finally, San Francisco's Strategies to Address Greenhouse Gas Emissions meet the CEQA and BAAQMD requirements for a qualified Greenhouse Gas

[99] SF-CHAMP is built using the regional travel model, and adding additional detail to TAZs located within San Francisco.
[100] For additional detail on the process of developing the travel model, see the MTC documentation, *http://mtcgis.mtc.ca.gov/foswiki/Main/Development*.

Reduction Strategy, which the BAAQMD indicates in its May 2017 CEQA Air Quality Guidelines is an appropriate significance threshold for determining that a proposed plan would not result in a significant operational impact with respect to GHG emissions. Accordingly, projects that are consistent with San Francisco's GHG regulations would not contribute significantly to global climate change.

If implemented, subsequent development projects in the Plan Area would be consistent with the City's GHG regulatory framework, including the City's Strategies to Address Greenhouse Gas Emissions. Therefore, subsequent development projects in the Plan Area would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment. Moreover, subsequent development projects implemented under the Plan would be required to comply with the City's Greenhouse Gas Compliance Checklist for Private Development projects to ensure that projects are consistent with the City's greenhouse gas reduction strategies.

The Draft EIR traffic, transit, GHG, and air quality analyses are based on conservative assumptions regarding potential buildout of the Plan Area, as well as on reasonable assumptions regarding the jobs and housing that would be developed, as set forth in the growth projections included under "Analysis Assumptions," Draft EIR p. IV-4. It would be speculative and unnecessary for the Draft EIR to attempt to predict the exact nature of development within the Plan Area, especially to a level of detail that predicts job income level, and CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145).

Traffic and Pedestrian Safety in the SoMa Pilipinas – Filipino Cultural Heritage District

The comments also addressed potential impacts related to traffic and pedestrian safety within the area of the SoMa Pilipinas – Filipino Cultural Heritage District. Traffic and pedestrian safety impacts are discussed in Draft EIR Section IV.D, Transportation and Circulation, and mitigation measures to address these impacts are also included in this section. Additional information concerning traffic impacts can be found in the Response TR-6, p. RTC-149, while additional information concerning pedestrian safety impacts can be found in Response TR-9, p. RTC-167, of this document.

Overall, for reasons discussed herein, the comments about gentrification and displacement with regard to the environmental impact analysis in the Draft EIR do not require revisions to the Draft EIR, and these comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment OC-2: Growth from New Development

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

O-UNITE Here.2

"But I want to mostly focus on the jobs-housing imbalance that is presented in the Draft Plan as it is and as discussed in the DEIR and a statement in the DEIR that only a portion of employees or residents of a given building will be likely to relocate to the area based on their employment or housing.

"Again, that's from the DEIR. There's no substantiation given for this claim, but it's used to underpin the DEIR's assertion that protection from displacement will be provided for Central SoMa residents. And this should not be presented without further data or analysis.

"And it also belies San Francisco's recent history. We've all seen advertisements for high-rise high-end housing developments that advertise their proximity to Twitter and ZenDesk and other tech companies as an incentive. So we believe it's just not accurate to say that these kinds of developments will not have -- will not cause migration and movement to the area." *(Cynthia Gómez, UNITE Here, Local 2, Hearing Transcript, January 26, 2017 [O-UNITE Here.2])*

Response OC-2

The comments express concern regarding the "jobs-housing imbalance" presented in the Plan and request substantiation of the statement in the Draft EIR that only a portion of employees under the Plan would relocate to the Plan Area (i.e., express concerns regarding displacement, especially when taking into account the current market for housing that is located in proximity to tech industry companies in San Francisco). For a discussion of gentrification, displacement, and socioeconomic effects in general, see Response OC-1, p. RTC-248.

The Plan proposes broad zoning controls that allow for multiple types of uses. The Planning Department predicted the type of development that would occur based on reasonable assumptions detailed in the "Overview" section of the Draft EIR on pp. IV-4 to IV-7. It would be speculative to assign precise numbers to the effect of the Plan on the City's overall jobs-housing ratio due, in part, to the long timeframe for buildout of the Plan. As discussed in previous responses, CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145). Nonetheless, this response addresses comments about jobs-housing ratios and balance for informational purposes.

Calculating jobs-housing ratios may be useful for understanding the nature of urban development and commute patterns. An effective balance—i.e., one that leads to less travel—depends on several factors, including how many workers live in a "typical" household. However, jobs-housing ratios are functions of complex transportation system dynamics and are best considered from a sufficiently broad geographic perspective, such as at the regional and multi-city scales, and are much less relevant at a neighborhood scale.[101]

Using job and household data presented in **Table RTC-4, City of San Francisco Anticipated 2010–2040 Growth, 2015–2040 ABAG "Projections 2013" Regional Projections, and Plan Bay Area PDA Projections, 2010–2040**, buildout of the Plan in and of itself represents a jobs-housing (i.e., jobs-households) ratio of approximately 5.2 for projected 2040 conditions within the Plan Area, as compared to an existing jobs-housing ratio of approximately 6.7 within the Plan Area (ABAG 2013).

[101] San Francisco Planning Department, Memo to the Planning Commission re: Informational Overview of San Francisco Job-Housing Balance Trends 1985–2015, February 22, 2017, *http://commissions.sfplanning.org/cpcpackets/Memo%20to%20CPC_2Mar2017_InfoHearing_JobHousingTrends.pdf*, accessed August 1, 2017.

TABLE RTC-4 CITY OF SAN FRANCISCO ANTICIPATED 2010–2040 GROWTH, 2015–2040 ABAG "PROJECTIONS 2013" REGIONAL PROJECTIONS, AND PLAN BAY AREA PDA PROJECTIONS, 2010–2040

	2010	2040
Plan Area: Projected Growth[a]		
Households	6,800	21,200
Jobs	45,600	109,200
Jobs per Housing Unit	6.7	5.2
Citywide: Projected Growth[b]		
Households	345,811	447,350
Jobs	568,720	759,500
Jobs per Housing Unit	1.6	1.7

NOTES:
a. Table IV-1 of the Draft EIR, p. IV-6.
b. ABAG, *Projections 2013*.

A jobs-housing ratio of 5.2 reflects that the increment of Plan growth would provide more employment than housing; however, when compared to the existing jobs-housing ratio of 6.7, it can be seen that development under the Plan would also represent an overall increase in households per job that are expected to be established within the Plan Area by 2040. More importantly, the current jobs-housing ratio for the city as a whole is approximately 1.64, and is expected to increase by about 4 percent through 2040. (In its *Projections 2013*, ABAG projects a 2040 jobs-housing ratio of 1.70 for the city.) These numbers reflect the reality that, although the jobs-housing balance in discrete neighborhoods and areas of the city may reflect far more housing than jobs or, as in the case for the Plan Area, generally more jobs than housing, the existing and projected jobs-housing ratio for the city as a whole is anticipated to change to a lesser degree. The City has undertaken a concerted effort to add new housing capacity and accelerate the development of housing in the city, and has succeeded over the past 25 years in substantially increasing its planned housing capacity.[102] While the Plan includes more development of employment uses than housing, this does not detract from other City initiatives to increase housing in other parts of the city, including, for example, the Downtown area, which is located in proximity to the Plan Area. Therefore, the comment that the Plan represents a jobs-housing "imbalance" is not accurate from the appropriate city-level or regional perspective.

The comments also express concern regarding substantiation of the statement in the Draft EIR that only a portion of employees under the Plan would relocate to the Plan Area. As presented in the Initial Study for the Central SoMa Plan (Draft EIR Appendix B), the statement that a demand for an estimated 19,900 new dwelling units would be created by new employment under the Plan is supported by evidence presented in the nexus study prepared for the Jobs-Housing Linkage Program (Planning Code Sections 413 et seq.). This statement is further supported by using the existing proportion of employees who both live and work in San Francisco, as well as an estimate of workers per household also based on existing City data. This estimate uses the estimated Plan-related increase in employment (up to 58,900 employees, as of the writing of the Initial Study) multiplied by the fraction of San Francisco employees who currently also live in the city (55 percent). The resulting approximate

[102] Ibid.

number of Plan-related employees who would live in the city (32,400) was then divided by the average number of workers in households where workers reside (1.63), resulting in the estimated housing demand of about 19,900 units (58,900 x 0.55 ÷1.63 ≈ 19,900). Since the Initial Study was written, the estimated amount of Plan-related employment was increased, for the purposes of the Draft EIR analysis, to approximately 63,600. Using the same method used in the Initial Study, the estimated demand for new dwelling units would be slightly larger, at approximately 22,000 rather than 19,000.

Regardless, and as stated on Draft EIR pp. IV-4 through IV-7, development under the Plan would not stimulate new population or job growth within San Francisco that is not already projected by the City to occur, as well as regional growth forecasts and regional air quality planning efforts. As stated in the Draft EIR, the potential housing demand generated by expected office development would be offset by new housing development forecast both within the Plan Area and for the city as a whole, as well as through the City's affordable housing programs (Inclusionary Affordable Housing Program and Jobs-Housing Linkage Program). Therefore, revisions to the Draft EIR to address the comments are not required. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment OC-3: Growth-Inducement Analysis Is Inadequate

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

O-CSN-1.27
O-CSN-1.46

"**D. The Plan will have Significant Adverse Growth-Inducing Impacts that are Inadequately Analyzed in the DEIR.**

"CEQA requires that an EIR include a detailed statement setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code Section 21100(b)(5). A proposed project is either directly or indirectly growth inducing if it: (1) fosters economic or population growth or requires additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. CEQA Guidelines Section 15126.2(d). While growth inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., traffic, air pollution, etc.) may be significant and adverse. In such cases, the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project. The analysis required is similar in some respects to the analysis required to analyze impacts associated with population and housing.

"Urban Planner Terrell Watt, AICP, explains that the DEIR contains a discussion of Growth Inducement at Section V.D. The discussion acknowledges the proposed zoning changes under the Project would expand the Plan Area's capacity for growth through a planning horizon year of 2040, during which time up to an additional 14,500 residential units and up to an additional 63,600 jobs could be accommodated in the Plan Area. The discussion provides no analysis of the Project's potential to induce growth in accordance with CEQA, nor does

the discussion reach any conclusions as to the significance of growth inducing impacts instead relying on the assertion that the growth allowed by the Project is simply an accommodation of growth projected for the region.

> Watt states:
>
> There is no question the Project will allow substantial growth in the Central SOMA neighborhood; more than an increase of 450 percent for jobs and at least 300 percent for housing. Due to the Project's high employment to housing ratio regardless of which jobs growth assumption, the Project will result in additional demand for housing in the Project area or beyond. In addition, substantial new non-residential and residential growth will require additional public services, likely including expansion and therefore construction of facilities in the neighborhood or adjacent neighborhoods. Yet the DEIR neither discloses or analyzes these impacts. CEQA requires that if new construction of housing will occur to accommodate the Project's employees or services expanded, then the EIR must analyze the environmental impacts of that construction. The appropriate components for an adequate analysis include: (1) estimating the amount, location and time frame for growth that may result from the implementation of the Project (e.g., additional housing); (2) considering whether the new population would place additional demands on public services such as fire, police, recreation, emergency, health, childcare or schools; (3) applying impact assessment methodology to determine the significance of secondary or indirect impacts as a result of growth inducement; and (4) identifying mitigation measures or alternatives to address significant secondary or indirect impacts. CEQA Guidelines Appx. G Section XIII(a). The DEIR must be revised to provide this analysis." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.27])*

"1. The DEIR's Analysis of the Project's Growth-Inducing Impacts is Flawed

[Editor's Note: The following paragraph is quoted above in Comment O-CSN-1.27, with the exception of the underlined phrase, but the text is repeated here in the interest of continuity in this Comment O-CSN-1.46.]

"CEQA requires that an EIR include a detailed statement setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code Section 21100(b)(5). A proposed project is either directly or indirectly growth inducing if it: (1) fosters economic or population growth or requires additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. CEQA Guidelines Section 15126.2(d). While growth inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., displacement of households, demand for additional housing and services, traffic, air pollution, etc.) may be significant and adverse. In such cases, the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project. The analysis required is similar in some respects to the analysis required to analyze impacts associated with population and housing.

"The DEIR contains a discussion of Growth Inducement at Section V.D. The discussion acknowledges the proposed zoning changes under the Project would expand the Plan Area's capacity for growth through a planning horizon year of 2040, during which time up to an additional 14,500 residential units and up to an additional 63,600 jobs could be accommodated in the Plan Area.[11] The discussion provides no analysis of the Project's potential to induce growth in accordance with CEQA, nor does the discussion reach any conclusions as to the significance of growth inducing impacts instead relying on the assertion that the growth allowed by the Project is simply an accommodation of growth projected for the region.[12]

"The DEIR presents growth assumptions at page IV-5 as follows:

> "Citywide growth forecasts prepared by the Planning Department are part of the basis of the analysis in this EIR. The Department regularly updates citywide growth forecasts that are based on Association of Bay Area Governments' (ABAG) regional projections of housing and employment growth. The Department allocates the regional growth forecasts to 981 Traffic Analysis Zones (TAZs) in San Francisco by first accounting for in-city growth that is already anticipated (both individual projects and planning efforts) in the so-called development pipeline, subtracting pipeline growth from the City's share of the regionally forecast growth, and allocating the residual amount of ABAG-forecast growth on the basis of weighting factors developed from analysis of both development capacity and existing development. **To establish baseline numbers for the Plan, the Planning Department relied on a 2010 Dun & Bradstreet database for employment numbers and the 2010 Census and the Department's Land Use Database for existing housing units. It is noted that the growth forecasts for the No Project condition (2040 Baseline) and for the Plan differ somewhat from those shown in the Initial Study due to modifications to the Plan since the Initial Study was published.** Footnote 60.
>
> Table IV-1, Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ("buildout year" or "planning horizon"). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. A certain amount of development and growth in the Plan Area would be expected to occur even without implementation of the Plan. In many cases, existing development does not reach its full potential under current building height limits, and those parcels could be developed regardless of future changes in land use policies and zoning controls. Development that could occur without project implementation is shown in the table below under the No Project scenario." DEIR at page IV-5.

"Footnote 60 explains: "Since publication of the Initial Study, Plan development assumptions have been modified to add development capacity to a portion of the block bounded by Bryant, Fifth, Brannan, and Sixth Streets (location of the San Francisco Flower Mart) and allow for approximately 430 units of affordable housing at Fifth and Howard Streets. In addition, development forecasts were adjusted to move the approved 5M Project and the under-construction Moscone Center Expansion from Plan-induced growth to cumulative growth. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study." [DEIR at page IV-5]

"Vastly different growth assumptions are presented elsewhere in the Central SOMA Plan, DEIR, Appendices and Policy Papers. For example, the Central SOMA Plan states: "With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing." Central SOMA Plan at page 7.

"The Financial Analysis of San Francisco's Central Soma Plan[13] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: "The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years."

[Editor's Note: The following paragraph is quoted above in Comment O-CSN-1.27, with the exception of the underlined sentence, but the text is repeated here in the interest of continuity in this Comment O-CSN-1.46.]

"The[re] is no question the Project will generate substantial growth in the Central SOMA neighborhood; more than an increase of 450 percent for jobs and at least 300 percent for housing. Due to the Project's high employment to housing ratio, regardless of which jobs growth assumption is used, the Project will result in additional demand for housing in the Project area or beyond. In addition, substantial new non-residential and residential growth will require additional public services, likely including expansion and therefore construction of facilities in the neighborhood or adjacent neighborhoods of a myriad of services. Yet the DEIR neither discloses or analyzes these impacts. CEQA requires that if new construction of housing will occur to accommodate the Project's employees or services expanded, then the EIR must analyze the environmental impacts of that construction. The appropriate components for an adequate analysis include: (1) estimating the amount, location and time frame for growth that may result from the implementation of the Project (e.g., additional housing); (2) considering whether the new population would place additional demands on public services such as fire, police, recreation, emergency, health, childcare or schools; (3) applying impact assessment methodology to determine the significance of secondary or indirect impacts as a result of growth inducement; and (4) identifying mitigation measures or alternatives to address significant secondary or indirect impacts. CEQA Guidelines Appx. G Section XIII(a). The DEIR must be revised to provide this analysis and based on this analysis, to revise other environmental analyses including but not limited to population and housing, transportation, air quality, among other topics where impacts are derived in part from direct and indirect growth assumptions."

Footnotes:

[11] Growth directly allowed by the Project is equivalent in scale to a new town, small suburb or city. Under no reasonable interpretation could the growth proposed by the Project be considered insignificant and therefore, by extension, the impacts of that growth – on services, housing demand, air quality, etc. -- are also significant.

[12] It goes without saying that even if the growth reflects projected growth for the region, that growth had the potential to significantly impact the Project area; impacts not adequately considered or analyzed in the regional plans and accompanying environmental documents.

[13] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.46])

Response OC-3

The comments address the discussion of growth-inducement in the Draft EIR and express concern that the Draft EIR provides inadequate analysis of the Plan's potential to induce growth in accordance with CEQA, and does not provide a conclusion regarding the significance of growth-inducing impacts, and that the Plan would result in additional demand for housing and public services, the impacts of which are not disclosed or analyzed in the Draft EIR. The comments also state that the growth assumptions in the Plan, Draft EIR, Appendices, and Policy Papers (such as the Financial Analysis) are inconsistent.

The Draft EIR includes a brief summary evaluation of the potential growth-inducing impacts of the Plan in Section V.D, Growth Inducement, starting on p. V-5 of Chapter V, Other CEQA Considerations. The entire Draft EIR evaluates the effects of growth that would occur as a result of adoption and implementation of the Central SoMa Plan. That is, the projected increase of 63,600 jobs and 14,500 housing units are the basis of the environmental analysis contained in every topical section of the Draft EIR and the Initial Study. As

acknowledged in Draft EIR Section V.D, adoption and implementation of the Plan could be seen as removing an impediment to future population and employment growth forecasted for San Francisco. However, given the access to transit, the Plan would serve to accommodate this growth in a way that is more sustainable than if such employment growth were to be diverted to more outlying portions of the Bay Area with less density and less access to local and regional transit. Furthermore, there are numerous connections between the Plan Area and adjacent areas, roadways, and freeways; therefore, there are no obstacles to future development that implementation of the Plan would affect.

As discussed above under Response OC-2 and shown in Table RTC-4, City of San Francisco Anticipated 2010–2040 Growth, 2015–2040 ABAG "Projections 2013" Regional Projections, and Plan Bay Area PDA Projections, 2010–2040, p. RTC-258, implementation of the Plan would not result in increased growth relative to that anticipated by the City's growth projections and 2040 projections by ABAG. In other words, the Plan would not create new jobs or new demand for housing in San Francisco or the Bay Area, but it would serve to concentrate a higher portion of anticipated growth in the Plan Area than would otherwise occur. Pursuant to ABAG projections, the same level of employment and population growth would occur in San Francisco with or without the Plan. Without adoption of the Plan, however, this growth would be more dispersed (see Draft EIR Appendix B, Initial Study, p. 82). Thus, development under the Plan would direct a higher portion of projected development to two designated regional Priority Development Areas (PDAs), within which the Plan Area is located. Consistent with Plan Bay Area, development under the Plan would accommodate a large part of the city's share of anticipated regional growth in jobs and housing, and would reduce greenhouse gas emissions per person. In addition, increasing intensity of uses over the longer term in this part of the city can support a broader range of public transportation options, including buses and Muni, which would reduce reliance on vehicles, thereby further reducing corresponding per capita greenhouse gas emissions citywide. As discussed in Draft EIR Section IV.D, Transportation and Circulation, the density of uses proposed under the Plan would result in a lower average VMT than both the regional and San Francisco average VMT, indicating the efficiency inherent in the Plan and its success in reducing greenhouse gas emissions. That is, the effects of this growth are analyzed in all topical sections in the Draft EIR and Initial Study.

In addition, as discussed above under Response OC-2, development under the Plan would not stimulate new population or job growth within San Francisco that is not already projected to occur. As stated in the Draft EIR, the potential housing demand generated by expected office development would be offset by new housing development forecast both within the Plan Area and for the city as a whole, as well as through the City's affordable housing programs (Inclusionary Affordable Housing Program and Jobs-Housing Linkage Program).

Specifically, with respect to public services, which one comment states would require expansion and construction, the Initial Study (Draft EIR Appendix B) analyzes the effects of new and expanded public services required to serve anticipated growth within the Plan Area under Recreation (Section D.10, p. 101), Utilities and Service Systems (Section D.11, p. 180), and Public Services (Section D.12, p. 118). As stated on Initial Study p. 121, should the Fire or Police Department determine that new facilities were required in the future, "any potentially adverse effects from new fire facilities would be similar to those anticipated by development under the Plan, such as noise, archeological impacts, air quality impacts such as emissions of dust and other pollutants, including diesel exhaust, and temporary street closures or other traffic obstructions." As such, the Initial Study finds that effects on public services would be less than significant. One aspect of Utilities and Service Systems—cumulative effects of Plan Area growth, combined with other growth on the potential for combined sewer

discharges—is evaluated in Draft EIR Section IV.I, p. IV.I-31, and the effects thereof are also found to be less than significant. As such, no revisions to the Draft EIR are required.

Concerning the comments regarding varied growth assumptions, see Response PD-6, p. RTC-77. See also Response PS-2, p. RTC-336, for additional discussion of impacts related to public services.

Comment OC-4: Plan Does Not Address Homelessness

This response addresses the comment from the commenter listed below; the comment is quoted in full below:

O-VEC.13

"The DEIR also did not address the issue of homelessness where there is a shelter within the area plan (i.e MSC South) and some encampments within the area plan. The DEIR should provide study of where people live or stay and how will they be affected by this proposed area plan." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.13])*

Response OC-4

The comment states the Draft EIR should address the issue of homelessness and provide a study of how the homeless currently living in shelters or encampments within the Plan Area would be affected by development under the Plan. As acknowledged in the Plan, the Plan Area includes a homeless population and services for the homeless, including the large Multi-Service Center (MSC) Shelter located at Fifth and Bryant streets, operated by the St. Vincent de Paul Society, with funding from the City. Under the Plan, this site would be rezoned from a Western SoMa Service, Arts, and Light Industrial Use District to a Western SoMa Mixed-Use Office Use District, and the height limit would increase from a maximum of 55 feet to 130 feet. In theory, these changes would increase the potential for subsequent development to occur on the site. However, inasmuch as this site is owned by the City, it is not considered reasonably foreseeable that the Plan would result in imminent displacement of the existing shelter.

Services, shelter, and housing for the homeless are provided through city-wide programs overseen by the Department of Homelessness and Supportive Housing, which was formed in 2016. The City is actively pursuing a goal to reduce the number of homeless and chronically homeless through increased funding for supportive services and the creation of homeless facilities, such as the three Navigation Centers (shelters providing housing, healthcare, and employment services) established in the city since March 2015.

As noted in the Draft EIR, the Plan is a regulatory program that would, if adopted, result in new planning policies and controls for land use to accommodate additional jobs and housing. The Plan itself would not result in direct physical changes to existing land uses. Indirect physical effects could result because specific development projects allowed under the Plan could replace existing residences and businesses, or increase space for residences or businesses in the Plan Area. Physical changes resulting from the secondary development-related effects of the Plan that could result in impacts on homeless communities would be even less directly attributable to the Plan itself. Furthermore, these impacts are uncertain and unknown, which prevents the City from completing an informed and meaningful evaluation of any such potential effects. In addition, there is no

evidence that impacts related to homeless encampments or relocation result in significant adverse environmental impacts that would not be otherwise addressed by existing City and regional services, with the possible exception of effects related to homeless encampments located in riparian areas.103 The commenter has not provided any additional information or evidence of how the Plan could affect the homeless population in a manner that could result in further physical environmental effects not disclosed in the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

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[103] One study has evaluated the impacts of trash and riparian zone alterations associated with a homeless population located in the area of the Guadalupe River in San Jose California, and it showed that areas of the riparian zone heavily inhabited and/or traveled by homeless individuals or groups are more impacted by trash, streambank alterations, and wildfire than those areas less heavily used and inferred that this was likely to cause an adverse impact to the environment (White, Courtenay, *Impacts of Homeless Encampments, School of Environment and Sustainability, Royal Roads University, British Columbia*, November 19, 2013).

D.14 Alternatives

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

- Comment AL-1: Analyze Additional Alternatives in the Draft EIR
- Comment AL-2: Environmentally Superior Alternative Analysis
- Comment AL-3: Support for Alternatives Identified in the Draft EIR

Note: As stated in Section D.1, Project Description, comments stating that the Plan should facilitate more residential development than is proposed are responded to in this Section D.14, Alternatives, along with like comments calling for alternative(s) with more housing.

Comment AL-1: Analyze Additional Alternatives in the Draft EIR

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

O-CSN-1.4
O-SOMCAN-Cabande.22
O-SOMCAN-Cabande.24
I-Brennan-1
I-Camp.1
I-Domalewski.1
I-Ferro, A.3
I-Ferro, M.1
I-Rosenberg.1
I-Rosenberg.4
I-Schwark-1.1
I-Schwark-2.1
I-Su.1
I-Weel.1
I-Whitaker.1
I–Whitaker.4

"In the alternative, the Neighbors request that the City consider an alternative that would modify the proposed Plan to eliminate the proposed changes that would allow extremely tall buildings in the block bounded by I-80 and Folsom and Second and Third Streets (including the tallest buildings on Harrison that go up to 350 feet). These buildings are inconsistent with the Plan's own goals to limit taller buildings to areas near BART and Caltrain. These properties are close to neither BART nor Caltrain, but are at the foot of the Bay Bridge access ramps. Development would therefore encourage automobile usage, not public transit, violating the fundamental Project goals. These properties should be limited to no more than 130 feet, which would still allow for substantial development on the properties, but maintain the mid-rise character of the neighborhood." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.4])*

"Going forward, a version of the Central SoMa Plan that creates a family-friendly neighborhood would be SOMCAN's preferred alternative. We are recommending that Planning study a new alternative that supports growth of SoMa in a way that supports the needs of current and future youth, families and seniors. None of the alternatives currently outlined in the plan supports this vision or these needs, and instead will reshape SoMa to be San Francisco's second Financial District with little regard to the protection of the environment of existing residents, small businesses, non-profits and PDR spaces. *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.22])*

"Despite SOMCAN's history in engaging with a diverse and large constituency in SoMa, SOMCAN was not provided an opportunity to participate in TODCO's 'community alternative', and therefore we can not endorse this alternative. While the Mid-Rise Alternative has intriguing elements, it does not come close to being a vision that we can embrace. The changes in boundaries, the brief public comment on the published DEIR all make it impossible for the SOMCAN, its members and the larger SoMa community to adequately assess the Plan or any of its proposed alternatives." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.24])*

"I would like for the Central SoMa Plan to include more housing. I appreciate the number of jobs the plan permits, and I think transit-oriented, dense housing would be a great compliment to those jobs. I want more housing at all income levels. Please consider adding more housing to the plan, or creating an alternative plan that allows for more dense, infill housing." *(Nicole Brennan, E-Comment, February 13, 2017 [I-Brennan-1])*

"My name is Daniel, and I wanted to quickly send in my comments on the Central SOMA Plan. I am a San Francisco resident who works in SOMA. While I appreciate that the current plan seeks to accommodate the rapid job growth the Bay Area has seen in recent years with a large amount of new office space, I am extremely concerned about the lack of housing relative to said job growth.

"If we choose to accommodate a large amount of jobs/office space in this area, we MUST also build new housing for the workers to live in. Failing to do so will only increase housing costs in the immediate area (which are already extremely expensive), and force workers + existing residents to seek housing in other areas. Every person who is displaced from the housing market in this area will be one more body clogging our mass transit systems or freeways; this plan in its current form is socially and environmentally irresponsible.

"In summary, I support keeping the amount of jobs/office space the same, but strongly urge you to increase the number of housing units. The EIR for the Central SOMA Plan should analyze an alternative scenario that include more housing." *(Daniel Camp, Email, February 13, 2017 [I-Camp.1])*

"My name is Armand Domalewski. I live in the Tenderloin; every day I witness the human price of generations of bad city planning. Folks who might have afforded to cling onto an SRO with their social security checks just a few years ago are rotting on our street, and the lucky ones amongst us who can go to sleep with a roof above our head and food in our bellies are [all] live in the constant fear that we are just one bad week away from joining our neighbors in the street.

"You don't need me to tell you that, despite recent progress, the housing situation in San Francisco is bad.

"Really bad.

"What you do need me to tell you, apparently, is that the zoning changes you are proposing represent a continuation of the dangerous thinking that lead us to where we are today. For decades, we have approved more office space than housing---we have encouraged the gap to grow and grow, to the point that displacement is wrecking the community that I love and traffic is ensnaring the streets we adore.

"Enough is enough. Add more housing to this plan." *(Armand Domalewski, Email, February 13, 2017 [I-Domalewski.1])*

"I and other property owners in the area request a new alternative with two variants to be included in the EIR. This alternative will:

"**Variant I**

- Increase the height of Block 3778, lots 16, 17, 18, 19, 51, 22, 23, 25, 26, 52 to 67 and 32, 68-87, 16, 46, 46, 46D, 46E, 46F, 46G, 46H on the south side of Bryant Street or fronting on Sixth Street and/or Morris Street from the existing 40/55X or 65-X to 85';
- Reclassify of the entire block of 3778, and lots 48 and 49 of block 3777 to MUO;
- Decrease the proposed 270-CS to 160-CS in Block 3778 so that the height of the taller buildings will increase as they get closer to the Caltrain Station on Townsend Street. This change will allow for tall buildings on Townsend Street between Fourth and Sixth Streets that overlook the Caltrain station; and
- Incorporate NCT zoning along Fourth, Sixth and Folsom Streets.

"**Variant 2**

"This Variant will be the same as Variant 1 except that the 270-CS portion of the flower Mart site would remain. Finally, residential buildings up to 85' high under the Planning Code are less costly to construct than high rise structures resulting in new housing units that are more affordable." *(Angelo Ferro, Letter, January 26, 2017 [I-Ferro, A.3])*

"We feel that there's some additional land use proposals that can be done along Sixth between Fifth --between Bryant and Brannan, and also along Bryant between Sixth and Fifth. And we'd like to submit those comments in writing to you today for your review." [This comment is referring to the comment submitted by Angelo Ferro above.] *(Mike Ferro, Hearing Transcript, January 26, 2017 [I-Ferro, M.1])*

"Overall, the Central SoMa plan needs to accommodate for far more people than it currently does. A height limit of 120-200 feet in most places simply isn't enough to handle the demand of living in So Ma. I would like to see the height limit increased to at least 300-600 feet in most places." *(Isaac Rosenberg, E-Comment, January 23, 2017 [I-Rosenberg.1])*

"Overall, this plan was started in 2011. Since then, San Francisco has added over 200,000 jobs. Yet this plan only zones for an additional 45,000 jobs. This simply isn't enough. We need policies that are in touch with the times that we live in.

"We need policies that enable the creation of safe, affordable homes at a meaningful scale." *(Isaac Rosenberg, E-Comment, January 23, 2017 [I-Rosenberg.4])*

"I'm writing today to express my extreme disappointment in the Central SoMa Plan and it's EIR. I live at 6th and Market near the edge of the plan area, and also write as a member of the SF Bay Area Renters Federation and SF YIMBY Party.

"The most critical paragraph in the Central SoMa plan for understanding why it must be sent back to the drawing board for a thorough reconsideration is this:

"'Under existing city rules, there is potential to build space for approximately 10,000 jobs and 2,500 housing unit. With the adoption of the Central SoMa Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The plan therefore represents an increase in development capacity of 450% for jobs and 300% for housing' - Central SoMa Plan

"I don't call for a thorough reconsideration lightly. Last year we witnessed a coordinated PR campaign by so-called housing 'advocates' in the city to dub the AHBP a 'displacement bomb'. AHBP solely sought to create more housing units (perhaps around 15,000) without greatly increasing jobs. Despite the negative propaganda attack, in truth it would have eased displacement overall. On the other hand, looking at the numbers for Central SoMa, we can see the true displacement bomb is actually right now above our heads.

"*It is an abdication of your civic duty to ignore this.*

"In the absence of a *surplus* of developable housing over developable and planned office space/jobs in other parts of the city, and generously allowing for 2 workers per unit, Central Soma will result in the additional displacement pressure of 30,000 people. I am confident that under close inspection, you will find no such surplus of developable housing exists in the other area plans and neighborhoods of the city. If someone tells you such a surplus exists, ask to see the *citywide* numbers for both housing *and jobs*.

"Central Soma is short about 14,000 housing units (total 22,500), just to make it do no harm.

"I believe we should specifically ask the planning department for:

1. An EIR option that is Jobs-housing balanced at the same level of office space creation as currently in the plan, and
2. An option that allows for 2x as many people housed as employed.

"It is a failure of our process that in our current housing shortage Planning thought it was politically acceptable present only plans that made our housing crisis worse or *much much worse*.

"I don't think we should micromanage the planning department by telling them how to arrive at plan that doesn't displace 30,000 people, and I would like to stress that I do believe we need the commercial space zoned in the plan, and would prefer we allow developers to convert airspace into housing.

"That said, if we can't resolve the jobs/housing balance issue with just adding more housing, and we were to push some office development to other areas in order to create more housing, that is also better than the current plan. For instance, if we pushed office development to Oakland, the EIR doesn't really look at potential lower VMT numbers and transit efficiencies due to workers from the East Bay not needing to take the bridge or tunnel into the City. Less office in Central Soma would also or create a better development environment for office projects in Mission Rock and Eastern Neighborhoods areas that are depending on commercial space to fund affordable housing creation, parks etc.

"The city controller has estimated that all else being equal, an increase in 1% in the housing stock of the city will translate to about 1% decrease in housing prices. Applying this principle, the current plan's shortage of 15k units represents about a 4% rent hike for everyone. Imagine if we matched and then doubled the housing need created in the plan, building 45,000 housing units in Central SoMa. The increased housing capacity would create an 8% decrease in housing prices instead.

"We are not obliged to approve an area plan EIR in the same way we are an individual project EIR just because it touches on and mitigates all relevant EIR criteria. If the upzoning is passed however, projects must be approved if they meet the zoning and other policies, regardless of their impacts on the housing crisis. This is our last best chance to fix the displacement and social issues caused by new development in the plan area." *(Jon Schwark, San Francisco Bay Area Renters Federation, Email, February 13, 2017 [I-Schwark-1.1])*

"Probably the main thrust of my comment today is going to be jobs-housing balance. We've seen this happen in so many plans in San Francisco where we say -- we kick the can down the road and say that, oh, other neighborhoods are going to pick up the slack. The other neighborhoods, the Mission, the Haight, Western Division, they're not wanting to pick up the slack.

"So I think it's kind of responsible for us, when we add a whole new big Area Plan, to think within that Area Plan what is the jobs-housing balance? When you look at Central SoMa, it's about six-to-one. So we have created so much incentive to build more office and so much disincentive -- and we all know what we're talking about -- to build more housing.

"I'd really like it if we could send this back to the Planning Department and ask them to create more incentives to new housing, including maybe density bonuses, and maybe more disincentives or asks from office developers.

"I don't think that necessarily pushing office development to Oakland is a bad thing at this time because, as far as the transportation goes, we have a bottleneck crossing the bay. And more jobs available in Oakland means less people crossing the bay as opposed to here.

"But what we do have is a massive housing shortage compared to the number of people wanting to live in San Francisco because they have jobs here. So I'm not against development. I know all -- everybody always says that. But I'm actually not. Those of you who know me know that I'm almost always in support of the projects.

"But let's get it right at the big, wide-scale planning stage, and let's get more incentives to put housing here as opposed to only office." *(Jon Schwark, San Francisco Bay Area Renters Federation, Hearing Transcript, January 26, 2017 [I-Schwark-2.1])*

"I'm a Central Soma resident living at 673 Brannan. I'm part of a newly formed District 6 Coalition for Housing, a group of D6 residents who are pro-housing - our main comment on the EIR is that we would like to see an Increased Housing Alternative. The ratio of 7,500 housing units and 50,000 jobs is a poor housing to jobs ratio - even with the 33% affordable requirement (which is great), this housing to jobs ratio will only continue to push out the lower class, middle class, students, and elderly across the city, especially in the areas in or close to Central Soma.

"We realize this plan was formulated several years ago - the Bay Area housing crisis is even more acute now and receiving national media attention. Together we must put in greater efforts to provide opportunity to everyone who wishes to live in San Francisco. We would not like to see the # of jobs reduced - we also do not want an entirely new plan or new EIR process to start - we simply want an alternative for more housing (e.g. 20,000 housing units?) to be presented in the plan and EIR." *(Justin Su, Email, February 13, 2017 [I-Su.1])*

"I read much of the EIR, and I generally like what's going on, though as you probably guessed, I wouldn't have bothered writing a comment if there weren't a 'but''. Just as background here, my concern here is with the housing shortage. Lots of people want to live in the Bay Area, either because they're from around here, or because it's an economically successful and well diversified region with lots of interesting and lucrative jobs, or because of the region's cultural dynamism, or the comparatively inclusive attitude toward those whose ethnicity, sexual orientation, &c are considered too eccentric elsewhere. But amid all that acceptance and tolerance, there's one thing we don't do, and that's actually build housing for all the people that want to live here, and I think that's a shame. The plan would add a lot of potential housing, and that's good.

"The draft EIR has nearly 1000 pages of documentation on how all of this upzoning is not some sort of environmental disaster in the myriad ways that California considers things to be potential environmental disasters, including such apparent catastrophes as shadows on existing condos. You convinced me. It's not an environmental disaster.

"In fact, quite the opposite. Dense mixed use neighborhoods have much less environmental impact than people commuting in from Tracy or Stockton or Gilroy, which is realistically what you get only even more of when you change nothing. And that's where I'm ambivalent about the EIR as an EIR.

"What bugs me about the report is the alternatives analysis. Sure, the document demonstrates that the higher density alternative is not appreciably worse than building nothing, or than building less. But how does it compare to building more? Especially given the switch from Level of Service to Vehicle Miles Traveled, it seems that isn't necessarily a foregone conclusion. Shouldn't we be considering the possibility that a higher density alternative has LESS environmental impact?

"After all, with less housing in SOMA, we have more people driving cars in from elsewhere. If for a minute we set away the details of point-by-point impact review, I think that allowing more urban housing has less environmental impact. Not just less than some other plan for regulatory change, but also less than the zero-build alternative. Because zero-build doesn't mean zero-change. Business may have its ups and downs, but the structural economic advantages of prime metro areas like ours aren't going away. The region will continue to attract a lot of people. The default is not that everything stays as it is now. The default is that people move further and further away from the jobs centers until they find a place they can afford. When it comes to professionals like me, zoning restrictions may just be a way to transfer money from our wallets to that of the

landowners, but there many people who work here whose wallets aren't big enough for that. I've spoken to people who commute from as far as Sacramento!

"I think there are good arguments to be made that the housing shortage is not just a socioeconomic problem, but also an environmental problem. The alternative to more housing in San Francisco is more sprawl elsewhere. Even if we don't consider the incentive we create for ADDITIONAL sprawl to be pushed for elsewhere, densification can happen regardless, simple because more people pack into a housing unit, and that can definitely happen in Stockton just as well as it can happen in San Francisco. And having lots and lots of people commute in from elsewhere has all sorts of impacts on Vehicle Miles Traveled and climate change.

"Or, if you aren't allowed to consider the effects of things that happen elsewhere, since environmental damage that we can help avoid elsewhere is harder to incorporate into this type of analysis than damage caused directly by the changes, then think of it as additional mitigation. The plans have some impact on Vehicle Miles Traveled and on climate change. Having more density means less traffic, and also people living in an urban environment that is generally less impactful to the environment in numerous ways than living in lower density areas. This is not a potential future thing. It's something that's already happening. And adding more housing, including in the blocks that are weirdly set aside for PDR, helps mitigate the environmental impact of the project. Better than any of the alternatives under consideration." *(Jaap Weel, Email, February 13, 2017 [I-Weel.1])*

"There is a primary problem with the Draft EIR document in that it throws its hands up and resigns to the notion of what is called 'Unavoidable project-level and/or cumulative impacts related to land use, cultural and paleontological resources, transportation and circulation, noise and vibration, air quality, and wind.'

"There are ways to avoid the impacts related to land use, transportation and circulation, and air quality by tossing out the idea that Central SoMa needs more high-rise office space instead of more housing. We have a housing crisis in San Francisco and an unemployment rate of less than 3% - in other words, the addition of office space only increases the demand for housing by people who will fill these new jobs and who live outside of San Francisco, but sure would like to live in San Francisco.

"This is complete nonsense that we cannot avoid more traffic congestion that is very obviously increased when we add office space instead of housing downtown. These impacts are totally avoidable by adding housing - whereby helping to deal with the problem that Planning has already created with so many office buildings, and that is decreasing the demands on oversubscribed regional transportation infrastructure such as BART and the Bay Bridge.

"By increasing office space, an avoidable land use choice, we are also killing San Franciscans by shortening their lives via increased air pollution from increased traffic congestion in and around South of Market and nearby areas. This is a cardinal sin to be knowingly increasing traffic volumes in an area that already kills people prematurely due to air pollution from the highways that run through SoMa - and is already acknowledged by our Department of Public Health and the Planning Department via Article 38 in the San Francisco Health Code. While Article 38 helps by requiring post-2008 residential developments to include air filters, we do have such air filtering on older buildings such as my condo building, BayCrest Towers, which were built prior to 2008. Also, we'd like to have some added parks at some point for the hundreds of kids and seniors whose mental health and socialization depends on community public spaces. If the Central SoMa Plan is utilized to focus on housing instead of office, you can rest easy that the City is not knowingly shortening its citizens lives through

increasing traffic congestion and related air pollution/particulate matter. The air pollution increases from adding office are totally avoidable by adding housing instead. Please don't shorten my life - and don't open the City to a class action lawsuit by residents of So Ma affected negatively by this plainly avoidable environmental impact on our public health." *(James Whitaker, Email, February 12, 2017 [I-Whitaker.1])*

"Please do not punt and say these environmental impacts which include shorting the live[s] of San Franciscans in SoMa. That is an alternative fact, so-to-speak, because they can be avoided to a high degree with greater requirements for mitigations and a refocused Central SoMa Plan to build housing - not more unnecessary office space for a population already fully employed (less than 3% unemployment rate!)." *(James Whitaker, Email, February 12, 2017 [I–Whitaker.4])*

Response AL-1

In general, these comments state dissatisfaction with the alternatives considered in the Draft EIR and address the Plan and its merits, and include the following:

- A statement that preparation of the Draft EIR, along with changes in the Plan itself, including a change in the Plan Area boundary, did not sufficiently allow for public input, and that the public comment period for the Draft EIR was not sufficient for SOMCAN and the larger SoMa community to adequately address the Plan or its alternatives;
- A statement that SOMCAN cannot endorse TODCO's "community alternative" because SOMCAN was not provided an opportunity to participate in the formulation of the alternative;
- A statement that SOMCAN also cannot support the Mid-Rise Alternative;
- A request that the City evaluate a Plan alternative that creates a family-friendly neighborhood that supports the needs of current and future youth, families, and seniors;
- Statements that the Plan should provide for more housing (Increased Housing Alternative), either in addition to the Plan's proposed employment growth or in place of a portion of forecasted Plan Area employment;
- A statement that residential buildings up to 85 feet high under the Planning Code are less costly to construct than high-rise structures, construction of which could result in new housing units that are more affordable; and
- A request that the City consider an alternative that would limit building heights to 130 feet in the block bounded by I-80, Folsom Street, Second Street, and Third Street because the proposed heights for this block would be inconsistent with the Plan's goals to limit taller buildings to areas near BART and Caltrain, and would encourage automobile transit rather than public transit.

In addition to noting preferences for specific alternatives and requesting additional alternatives be analyzed, the first comment suggests that the public review period for the Draft EIR was too brief and not enough time was provided to allow adequate review of the document. The Draft EIR public review process is discussed on p. RTC-2 of this document. A typical Draft EIR public review period is from 30 to 45 days, and the state CEQA Guidelines stipulate that the public review period for a draft EIR shall not be longer than 60 days "except under unusual circumstances" (Section 15105). Administrative Code Section 31.14(b)(1) similarly requires public review of a draft EIR for not more than 60 days except under unusual circumstances. The public review period

for the Draft EIR was 60 days, from December 14, 2016, through February 13, 2017. See Response GC-3, p. RTC-383, for further discussion of the CEQA process.

The Draft EIR Evaluated a Reasonable Range of Alternatives

Pursuant to the CEQA Guidelines, an EIR must address a range of reasonable alternatives to the project that feasibly attain most of the project objectives but would avoid or substantially lessen any significant effects of the project (Section 15126.6). An EIR need not consider every conceivable alternative to a project but instead "must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR, however, does not have to identify and analyze alternatives that would not meet most of the project sponsor's basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, or alternatives that do not further reduce or eliminate significant impacts of the project. Under the "rule of reason" governing the selection of the range of alternatives, the EIR is required "to set forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines Section 15126.6(f)).

The Draft EIR identifies and analyzes five alternatives to the Plan, including (1) the CEQA-required No Project Alternative, (2) the Reduced Heights Alternative, (3) the Modified TODCO Plan, (4) the Land Use Variant, and (5) the Land Use Plan Only Alternative. The Draft EIR also discusses an alternative (initial TODCO Plan proposing higher height limits) that was considered for analysis and explains why this additional alternative was ultimately rejected from further analysis.

Alternatives were developed with the intention of reducing the Central SoMa Plan's significant and unavoidable impacts while still meeting most of the basic objectives. The Draft EIR identifies significant and unavoidable impacts that are generally tied to the Plan's overall intensity of development, street network changes, and height limits, and include effects related to historic architectural resources; transit capacity and delay; pedestrian overcrowding in crosswalks; on-street commercial loading and related hazardous conditions or delay that may affect transit, other vehicles, bicycles, or pedestrians; hazardous conditions and interference with pedestrian, bicycle, or vehicle circulation and accessibility due to construction; traffic noise (including a related General Plan Noise Element conflict); construction noise; emissions of criteria air pollutants and toxic air contaminants; and pedestrian-level wind. See **Table RTC-5, Significant and Unavoidable Impacts for the Central SoMa Plan**, for a complete list of all of the significant and unavoidable impacts. While some alternatives may also secondarily reduce the severity of other already less-than-significant impacts identified in the Draft EIR, CEQA only requires the analysis of alternatives that would reduce or avoid significant impacts.

TABLE RTC-5 SIGNIFICANT AND UNAVOIDABLE IMPACTS FOR THE CENTRAL SOMA PLAN

A. Land Use and Land Use Planning
Impact LU-2: Development under the Plan, including proposed open space improvements and street network changes, would conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
Specifically, the Plan could result in traffic noise along Howard Street (under the two-way option for Howard and Folsom streets) that exceeds the noise standards in the General Plan's Environmental Protection Element

TABLE RTC-5 SIGNIFICANT AND UNAVOIDABLE IMPACTS FOR THE CENTRAL SOMA PLAN

Impact C-LU-1: Development under the Plan, including the proposed open space improvements and street network changes, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would contribute considerably to a significant cumulative land use impact.
Specifically, the Plan, under both the one-way and two-way options for Folsom and Howard streets, could make a considerable contribution to cumulative traffic noise levels which would exceed the noise standards in the General Plan's Environmental Protection Element.
C. Cultural and Paleontological Resources
Impact CP-1: Development under the Plan would result in the demolition or substantial alteration of individually identified historic architectural resources and/or contributors to a historic district or conservation district located in the Plan Area, including as-yet unidentified resources, a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
Impact C-CP-1: Development under the Plan, in combination with past, present, and reasonably foreseeable future projects in the vicinity, could result in demolition and/or alteration of historical resources, thereby contributing considerably to significant cumulative historical resources impacts.
D. Transportation and Circulation
Impact TR-3: Development under the Plan, including the proposed open space improvements and street network changes, would result in a substantial increase in transit demand that would not be accommodated by local transit capacity, and would cause a substantial increase in delays resulting in adverse impacts on local and regional transit routes.
Impact TR-4: Development under the Plan, including the proposed open space improvements and street network changes, would not result in pedestrian safety hazards nor result in a substantial overcrowding on sidewalks or at corner locations, but would result in overcrowding at crosswalks.
Impact TR-6: Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial and passenger loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or pedestrians. [See staff-initiated text change to this impact statement on p. RTC-464.]
Impact TR-9: Construction activities associated with development under the Plan, including the proposed open space improvements and street network changes, would result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas, and would result in potentially hazardous conditions.
Impact C-TR-3: Development under the Plan, including the proposed open space improvements and street network changes, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative transit impacts on local and regional transit providers.
Impact C-TR-4: Development under the Plan, including the proposed open space improvements and street network changes, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative pedestrian impacts.
Impact C-TR-6: Development under the Plan, including the proposed open space improvements and street network changes, , and the associated increased demand of on-street loading, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative loading impacts. [See staff-initiated text change to this impact statement on p. RTC-470.]
E. Noise and Vibration
Impact NO-1: Development under the Plan, including the proposed street network changes, would generate noise that would result in exposure of persons to noise levels in excess of standards in the *San Francisco General Plan* or Noise Ordinance (Article 29 of the *Police Code*), and would result in a substantial permanent increase in ambient noise above existing levels.
Impact NO-2: Development under the Plan, including the proposed street network changes and open space improvements, would result in construction activities in the Plan Area that could expose persons to substantial temporary or periodic increases in noise levels substantially in excess of ambient levels.
Impact C-NO-1: Development under the Plan, including the proposed street network changes and open space improvements, in combination with past, present, and reasonably foreseeable future projects, would result in cumulative noise impacts.

TABLE RTC-5 SIGNIFICANT AND UNAVOIDABLE IMPACTS FOR THE CENTRAL SOMA PLAN

F. Air Quality
Impact AQ-3: Operation of subsequent individual development projects in the Plan Area and street network changes, but not proposed open space improvements, would violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.
Impact AQ-5: Development under the Plan, including proposed street network changes, would result in operational emissions of fine particulate matter ($PM_{2.5}$) and toxic air contaminants that would result in exposure of sensitive receptors to substantial pollutant concentrations.
Impact C-AQ-1: Development under the Plan, including proposed street network changes, but not open space improvements, in combination with past, present, and reasonably foreseeable future projects in the vicinity, under cumulative 2040 conditions, would contribute considerably to criteria air pollutant impacts.
Impact C-AQ-2: Development under the Plan, including the proposed street network changes, but not open space improvements, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in exposure of sensitive receptors to substantial levels of fine particulate matter ($PM_{2.5}$) and toxic air contaminants under 2040 cumulative conditions.
G. Wind
Impact WI-1: Subsequent future development anticipated under the Plan could alter wind in a manner that substantially affects public areas.

The five alternatives considered included some aspect of reduced density, elimination of the proposed street network changes, and/or lesser height limits because the identified significant and unavoidable impacts of the Plan are related to its proposed development intensity, street network changes, and building heights. The Land Use Plan Only Alternative, which would not implement the street network changes proposed by the Plan, was identified as the environmentally superior alternative because, although it would result in some significant and unavoidable impacts, as compared to the Central SoMa Plan and the other alternatives, it would avoid six associated significant and unavoidable effects of the Plan related to traffic noise and on-street loading, while still meeting most of the basic project objectives.

The alternatives described in Chapter VI, Alternatives, include sufficient detail to compare and contrast the impacts that would occur relative to the Plan. According to CEQA, an EIR "shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project" (CEQA Guidelines Section 15126.6(d)).

The basic purpose of a CEQA alternatives analysis is to identify options that would avoid or reduce physical environmental impacts that would result from implementation of a proposed action. Though implementation of the Plan could result in social or economic impacts, such impacts are generally not evaluated in an EIR, unless evidence shows that social or economic impacts would result in a corresponding physical environmental impact. As discussed in Response OC-1, p. RTC-248, no such environmental impacts that correspond to socioeconomic impacts have been identified for the Plan. Per the requirements of CEQA, an alternative specifically designed around social or economic conditions to support youth, families, and seniors is not required to be analyzed in the EIR. In summary, the Draft EIR examines a reasonable range of alternatives to the Plan and provides sufficient detail about these alternatives to identify the potential impacts that would result.

Family-Friendly Plan Alternative

Regarding the request to evaluate a Plan alternative that creates a family-friendly neighborhood that supports the needs of current and future youth, families, and seniors, the commenter does not specify the overall development program that would be considered under such an alternative or how these elements would be achieved. Furthermore, it is unclear how such an alternative would be considerably different from the alternatives already analyzed in the Draft EIR, or what significant impact identified in the Draft EIR that the alternative would address, and if such an alternative would be feasible or meet the Plan's basic objectives. Therefore, no analysis of such an alternative is possible or warranted.

Increased Housing Alternative

Regarding the comments that state the Plan should provide for more housing (Increased Housing Alternative), either in addition to the Plan's proposed employment growth or in place of a portion of forecasted Plan Area employment, to the extent that the comments simply support additional housing, the comments do not address the adequacy or accuracy of the Draft EIR. See Response PM-1, p. RTC-356, for further discussion regarding the merits of the Plan. See Response PD-10, p. RTC-80, for further discussion of the state density bonus program. Additionally, as explained in Response OC-1, p. RTC-248, the 75,000 housing units already planned for in San Francisco could accommodate a substantial portion of the housing demand from new employees in Central SoMa who desire to live in San Francisco. Regardless, because these comments support the provision of an alternative that includes additional housing in the Plan Area, they are responded to here. All of these comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. One comment states that the Draft EIR should include an alternative that is "Jobs-housing balanced at the same level of office space creation as currently in the plan," and an alternative that allows for twice as many people housed as employed. Some comments indicate that an alternative that provides more housing could reduce environmental impacts overall by allowing more workers within the Plan Area to live closer to their jobs, thereby reducing VMT and related impacts.

The selection and analysis of Plan alternatives is discussed above. For a discussion of jobs-housing balance in general, see Response OC-2, p. RTC-258, which explains that, while this measure is useful in a citywide or region-wide context, it is not particularly relevant within the context of a relatively small area, such as the Plan Area. The commenter is also referred to the analysis of the No Project Alternative in the Draft EIR (Chapter VI, Alternatives), which evaluates a reasonable scenario of likely growth within the Plan Area under existing regulations and policies, and which includes both a higher ratio of housing to jobs and a smaller total number of jobs than the other alternatives assessed in the Draft EIR.

Regarding the comments that alternatives that provide more housing could reduce environmental impacts overall by reducing VMT, the Draft EIR includes a number of alternatives that would do this. The vehicle miles traveled (VMT) analysis in the Draft EIR is based on the San Francisco County Transportation Authority's SF-CHAMP travel demand model, which estimates existing average daily VMT on a *per capita* [emphasis added] basis for traffic analysis zones (TAZs). VMT per capita is then used to measure the amount and distance that a resident, employee, or visitor drives and is compared to the *Plan Bay Area* VMT per capita reduction target 2040 goal, which is 10 percent below the Bay Area 2005 regional average VMT for residential development (no VMT per employee target was set). Based on the VMT analysis in the Draft EIR (see Section IV.D, Transportation and Circulation, pp. IV.D-35 through IV.D-38), VMT per person would decrease, both in the Plan Area and throughout the Bay

Area, if more housing were provided within the Plan Area. However, this only holds true if the housing were in addition to office employment proposed in the Plan Area. While the VMT analysis shows that the Plan would incrementally increase VMT per office job within the Plan Area by its increase in office jobs, these office jobs would still result in far less VMT per office job on a regional basis, assuming that the regional office employment total would remain constant. This is because office jobs in the Plan Area, and in San Francisco in general, generate substantially lower VMT per job than do office jobs elsewhere in the Bay Area, given the Plan Area's proximity to other regional transportation modes. While decreased office employment in the Plan Area could incrementally reduce VMT within the Plan Area itself, it may increase VMT regionally by forcing those jobs to occur elsewhere and in less-efficient VMT per capita settings, which is the key metric for greenhouse gas reduction. Accordingly, increasing housing by reducing employment, relative to the Plan proposals, could have greater impacts than would be the case with the Plan. The Plan's emphasis on providing space to accommodate employment within the Plan Area is explained in Draft EIR Chapter II, *Project Description*, on p. II-4:

> While the City has planned for more than 75,000 new housing units, its efforts have been less focused on the spatial planning needed to accommodate anticipated employment sector growth, especially office growth. Since adoption of the Downtown Plan in 1985, relatively few Downtown building sites remain to support continued job growth into the future. According to *Plan Bay Area* projections, remaining space in Mission Bay and new space added in the Transit Center District would not be sufficient to meet growth needs in the long run. Current low-vacancy rates and high rents in SoMa indicate that this is an area in high demand, and given access to available space, it is anticipated that companies in the information technology and digital media industries would increasingly seek to locate in this area, due to its central location, transit accessibility, urban amenities, and San Francisco's well-educated workforce.

Therefore, based on the foregoing discussion, adding another alternative that would reduce VMT is not necessary.

Regarding comments requesting the EIR include an alternative with more housing to reduce air quality impacts, it is not clear how such an alternative would reduce air quality impacts. Furthermore, the Draft EIR includes five alternatives, four of which—the No Project Alternative, the Reduced Heights Alternative, the Modified TODCO Plan, and the Land Use Variant—would reduce air quality impacts. As such, the Draft EIR provides a reasonable range of alternatives as required by CEQA; therefore, adding another alternative that would reduce air quality impacts is not necessary.

Limiting Heights for Residential Buildings and Changes to Zoning on Specific Parcels

The comments include a statement that residential buildings up to 85 feet high under the Planning Code are less costly to construct than high-rise structures, which could result in new housing units that are more affordable. This statement does not address the adequacy or accuracy of the Draft EIR; therefore, no changes to the Draft EIR are required.

The comments include a request for a new alternative with two variants identifying changes to bulk heights and zoning for specific parcels to be evaluated in the EIR. These comments do not provide evidence that the two suggested additional alternatives would meet the Plan objectives, nor that the alternatives would avoid or substantially lessen any significant effects of Plan implementation; as such, these alternatives need not be analyzed in the Draft EIR. The comments include a request that the City consider an alternative that would limit

building heights to 130 feet in the block bounded by I-80, Folsom Street, Second Street, and Third Street. The comments also include a statement that the proposed heights for this block would be inconsistent with the Plan's goals to limit taller buildings to areas near BART and Caltrain, and would encourage automobile transit rather than public transit. These comments pertain to the merits of the Plan and provide no evidence that the suggested alternative would reduce or eliminate any significant and unavoidable impacts of the Plan. The Draft EIR already includes an evaluation of the No Project alternative, a scenario that assumes building heights in the block in question are limited to 130 feet, as requested in the comments. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment AL-2: Environmentally Superior Alternative Analysis

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

O-CSN-1.37
O-CSN-1.58

"**VIII. THE DEIR ALTERNATIVES ANALYSIS IS LEGALLY DEFICIENT.**

"The DEIR's alternatives analysis is legally deficient because it fails to acknowledge that the Reduced Height Alternative is the environmentally superior alternative. The Reduced Height Alternative would reduce almost all of the Plan's significant impacts, while still achieving all of the Plan's objectives. It is therefore the environmentally superior alternative.

"An EIR must describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. 'An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making.' (*Laurel Heights I*, 47 Cal.3d at 404.) An EIR must also include 'detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.' (*Id*. at 405.)

"One of CEQA's fundamental requirements is that the DEIR must identify the 'environmentally superior alternative,' and require implementation of that alternative unless it is infeasible. (14 Cal.Code Regs. §1526.6(e)(2); Kostka & Zischke, Practice Under the California Environmental Quality Act §15.37 (Cont. Educ. Of the Bar, 2008).) Typically, a DEIR identifies the environmentally superior alternative, which is analyzed in detail, while other project alternatives receive more cursory review.

"The analysis of project alternatives must contain an accurate quantitative assessment of the impacts of the alternatives. In *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733-735, the court found the EIR's discussion of a natural gas alternative to a coal-fired power plant project to be inadequate because it lacked necessary 'quantitative, comparative analysis' of air emissions and water use.

"A 'feasible' alternative is one that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (Pub. Res.

Code § 21061.1; 14 Cal. Code Regs. § 15364.) California courts provide guidance on how to apply these factors in determining whether an alternative or mitigation measure is economically feasible.

"The lead agency is required to select the environmentally preferable alternative unless it is infeasible. As explained by the Supreme Court, an environmentally superior alternative may not be rejected simply because it is more expensive or less profitable:

> The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.

"(*Citizens of Goleta Valley v. Bd. of Supervisors* (1988) 197 Cal.App.3d 1167, 1180-81; see also, *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322 (county's approval of 80 unit hotel over smaller 64 unit alternative was not supported by substantial evidence).)

"The expert consultants at SWAPE conclude that the Reduced Heights Alternative is environmentally superior in that it reduces almost all of the Plan's significant impacts while still achieving all project goals. (SWAPE Comment, pp. 9-10). SWAPE includes a chart of impacts:

"A summary of the impacts and percent reduction (if applicable) the Alternative would result in are provided in the table below.

Reduced Heights Alternative Impact Reductions

Impact	**Percent Reduction from Proposed Plan**
Transit Ridership	(8%)
Pedestrian and Bicycle Operations	(8%)
Pedestrian Crowding in Crosswalks	Significantly Reduced
Bicycle Travel	Significantly Reduced
Demand for Off-Street Freight Loading Spaces	Significantly Reduced
On-Street Commercial Loading Spaces	Significantly Reduced
Curb Space for Passenger Loading/Unloading Zones	Significantly Reduced
Parking Demand	(10%)
Construction Activities	Significantly Reduced
Emissions of Criteria Air Pollutants, Greenhouse Gases (GHGs), and Traffic-Generated Toxic Air Contaminants (TACs)	Significantly Reduced

"We have prepared the analysis below showing that the Reduced Heights Alternative is environmentally superior to all other alternatives. The chart relies on the DEIR's own conclusions for each impact.

DEIR: S-55		CENTRAL SOMA	NO PROJECT ALT by 2040	REDUCED HEIGHT	MODIFIED TODCO	LANDUSE VAR Excludes Residential Uses	LANDUSE ONLY Excludes street network changes
JOBS + HOUSING	HOUSEHOLDS	14,400	9,200	12,400	12,700	12,900	14,400
	RESIDENTS	25,500	16,300				25,500
	JOBS	63,600	27,200	55,800	56,700	66,200	63,600
	TOTAL FLOOR AREA	31.7M SqFt	17.7M SqFt	27.6M SqFt	28.2M SqFt	30.5M SqFt	31.7M SqFt
GOALS	ABILITY TO MEET OBJECTIVES	ALL	SOME	MOST	MOST	MOST	MOST

DEIR: S-55		CENTRAL SOMA	NO PROJECT ALT by 2040	REDUCED HEIGHT	MODIFIED TODCO	LANDUSE VAR Excludes Residential Uses	LANDUSE ONLY Excludes street network changes
LAND USE	PHYSICAL DIV OF COMMUNITY	LTS	=	=	=	=	=
	LAND USE CONFLICT	SUM	<	=	=	=	<
	CUM. LAND USE CONFLICT	SUM	<	=	=	=	<
AESTHETICS	VISUAL CHARACTER	LTS	<	=	=	=	=
	VIEWS / VISTAS	LTS	<	=	=	=	=
	LIGHT / GLARE	LTS	<	=	=	=	=
	CUM. AESTHETICS	LTS	<	=	=	=	=
CULTURAL	HISTORICAL RESOURCES	SUM	<	=	<	=	=
	HISTORICAL RESOURCES	LTS	NI	=	<	=	<
	HISTORICAL RESOURCES	LTSM	<	=	=	=	=
	ARCHEOLOGICAL RESOURCES	LTSM	<	=	=	=	=
	TRIBAL CULTURAL RESOURCES	LTSM	<	=	=	=	=
	PALEONTOLOGICAL RESOURCES	LTS	<	=	=	=	=
	HUMAN REMAINS	LTS	<	=	=	=	=
	CUM. HISTORICAL RESOURCES	SUM	<	=	=	=	=
	CUM. HISTORICAL RESOURCES	LTS	NI	=	<	=	<
	CUM. ARCH. RESOURCES	LTSM	<	=	=	=	=
	CUM. PALEONTOLOGICAL RES	LTS	<	=	=	=	=
TRANSPORTATION + CIRCULATION	VMT	LTS	<	<	<	=	>
	TRAFFIC HAZARDS	LTS	<	<	<	=	>
	TRANSIT	SUM	<	<	<	=	=
	PEDESTRIANS	SUM	<	<	<	=	=
	BICYCLISTS	LTS	>	=	=	=	>
	LOADING	SUM	<	<	=	=	=
	PARKING	LTS	<	<	<	=	=
	EMERGENCY VEHICLE ACCESS	LTSM	<	<	<	=	<
	CONSTRUCTION	SUM	<	<	<	=	<
	CUM. VMT	LTS	<	<	<	=	>
	CUM. TRAFFIC HAZZARD	LTS	<	<	<	=	>
	CUM. TRANSIT	SUM	<	<	<	=	=
	CUM. PEDESTRIANS	SUM	<	<	<	=	=
	CUM. BICYCLISTS	LTS	>	=	=	=	>
	CUM. LOADING	SUM	<	<	<	=	=
	CUM. PARKING	LTS	<	<	<	=	=

DEIR: S-55		CENTRAL SOMA	NO PROJECT ALT by 2040	REDUCED HEIGHT	MODIFIED TODCO	LANDUSE VAR Excludes Residential Uses	LANDUSE ONLY Excludes street network changes
	CUM. EMERGENCY VEH. ACCESS	LTSM	<	<	<	=	<
	CUM. CONSTRUCTION	LTS	<	<	<	=	<
NOISE + VIBRATION	TRAFFIC NOISE	SUM	<	<	<	=	<
	CONSTRUCTION NOISE	SUM	<	<	<	<	=
	CONSTRUCTION VIBRATION	LTSM	<	<	<	<	=
	CUM TRAFFIC NOISE	SUM	<	<	<	<	<
AIR QUALITY	CONFLICT WITH CLEAN AIR PLAN	LTS	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (PLAN)	LTS	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (DEV)	SUM	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (CONSTR)	LTSM	<	<	<	<	=
	PM2.5 + TACS (OPERATIONAL)	SUM	<	<	<	<	=
	PM2.5 + TACS (CONSTRUCTION)	LTSM	<	<	<	<	=
	ODORS	LTS	<	=	=	=	=
	CUM. CRITERIA AIR POLLUTANTS	SUM	<	<	<	<	=
	CUM. PM2.5 + TACS	SUM	<	<	<	<	=
WIND	WIND	SUM	<	<	<	=	=
	CUM. WIND	LTS	<	<	<	=	=
SHADOW	SHADOW	LTS	<	<	=	=	=
	CUM. SHADOW	LTS	<	<	<	=	=
HYDROLOGY + WATER QUALITY	FLOODING	LTS	=	=	=	=	=
	CUM. WASTEWATER	LTS	=	=	=	=	=
	CUM. FLOODING	LTS	=	=	=	=	=

"Since the Reduced Heights Alternative reduces most Project impacts, while achieving almost all Project goals, the DEIR is arbitrary and capricious for failing to identify the Reduced Heights Alternative as environmentally superior." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.37])*

"**Reduced Heights Alternative Would Reduce Plan's Significant Impacts**

"As discussed in the sections above, our analysis demonstrates that the Plan would have a significant impact on air quality, pedestrian safety, and traffic. Therefore, in an effort to reduce these impacts to a potentially less than significant level, alternatives to the Plan should be considered.

"The Reduced Heights Alternative, for example, would permit fewer tall buildings south of the elevated Interstate 80 freeway than would be allowable under the Plan (p. VI-16). The Reduced Heights Alternative

would include the same street network changes and open spaces improvements that are proposed under the Plan. This alternative assumes the same sites would be developed as under the Plan, although at a lower intensity, resulting in marginally less development than that assumed under the Plan. Growth projections for the Reduced Heights Alternative estimate an increase of 12,400 households and approximately 55,800 jobs, reflecting 14 percent fewer households and 12 percent fewer jobs than the Plan. Total floor area developed under the Reduced Heights Alternative would be about 13 percent less than with implementation of the Plan (see table below) (p. VI-3, VI-16).

TABLE VI-1 DEVELOPMENT ASSUMPTIONS FOR ALTERNATIVES TO THE CENTRAL SOMA PLAN

	Central SoMa Plan[a]	No Project Alternative	Reduced Heights Alternative	Modified TODCO Plan	Land Use Variant
Household Growth (Increase from Baseline)[b]	14,400	9,200	12,400	12,700	12,900
Difference from Plan	—	(5,200)	(2,000)	(1,700)	(1,500)
Population Growth (Increase from Baseline)[c]	25,500	16,300	21,900	22,500	22,800
Difference from Plan	—	(9,200)	(3,600)	(3,000)	(2,700)
Residential Square Feet (Increase from Baseline)	17,280,000	10,800,000	14,880,000	15,240,000	15,480,000
Difference from Plan	—	(6,480,000)	(2,400,000)	(2,040,000)	(1,800,000)
Employment Growth (Jobs) (Increase from Baseline)	63,600	27,200	55,800	56,700[d]	66,200
Difference from Plan	—	(36,400)	(7,800)	(6,900)	2,600
Office Square Feet (Increase from Baseline)	10,430,000	5,000,000	9,151,000	9,299,000[e]	10,857,000
Difference from Plan	—	(5,430,000)	(1,279,000)	(1,131,000)	427,000
Non-Office Square Feet (Increase from Baseline)	4,007,000	1,900,000	3,515,000	3,572,000[d]	4,171,000
Difference from Plan	—	(2,107,000)	(492,000)	(435,000)	164,000

SOURCES: San Francisco Planning Department, 2013, 2016; TODCO, 2013; ESA, 2016.

NOTES:

Values rounded to nearest 100; some columns and rows do not add due to rounding.

Values in parentheses represent a reduction from the Plan.

The Land Use Plan Only Alternative would have the same growth and building development characteristics as that presented for the Plan in this table. See text for additional discussion.

a. The 2016 Central SoMa Plan is contained entirely within the boundaries of the 2013 draft Plan Area. The Department analyzed projected growth in employment and residential uses for the 2013 draft Plan and determined that 95 to 97 percent of this projected growth is anticipated to occur in the 2016 draft Plan Area. Thus, the numbers presented in this table, are conservative (i.e., higher) and would not substantively alter the conclusions reached in this EIR. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study.

b. Assumes 95 percent occupancy of housing units.

c. Assumes 1.77 persons per household.

d. Based on same factors as in Planning Department projections.

e. From TODCO Plan, p. 9, with addition of Planning Department projected growth north of Folsom Street (primarily in C-3 use districts).

"As you can see in the excerpt above, the Reduced Heights Alternative would have 14 percent fewer households, 12 percent fewer jobs, and would have a total floor area of about 13 percent less than the proposed Plan. This slight decrease in development would reduce the Project's traffic, air quality, and pedestrian safety impacts, and in some cases, this Alternative would reduce the Plan's significant impacts to a less than significant level. For example, as stated in the DEIR, the Reduced Heights Alternative would reduce the Plan's transit ridership by about eight percent (p. VI-24). This relative reduction in ridership would avoid the Plan's significant impact on

Muni capacity utilization on some screenlines and corridors under existing plus Plan and 2040 cumulative conditions (p. VI-24). Similarly, in terms of pedestrian and bicycle operations, the Reduced Heights Alternative would result in about eight percent less travel by these modes in 2040, compared to the Plan, and would implement the same proposed street network changes, including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks (p. VI-25). With incrementally less development in the Plan Area by 2040, the Reduced Heights Alternative would significantly reduce the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions. Bicycle travel would also be incrementally less frequent under the Reduced Heights Alternative, compared to conditions with the Plan, and the facilities that would be provided would be similar (p. VI-25).

"The Reduced Heights Alternative would result in less growth in demand for off-street freight loading spaces, on-street commercial loading spaces, and curb space for passenger loading/unloading zones, and would reduce the Plan's parking demand by 10 percent (p. VI-25, VI-26). Furthermore, the construction activities for this Alternative would be less intensive than the proposed Plan, due to the fewer tall buildings that would be constructed (p. VI-26). This reduction in construction activities would significantly reduce the air quality and traffic impacts when compared to the proposed Plan. Finally, as stated in the DEIR, 'emissions of criteria air pollutants, GHGs, and traffic-generated TACs would be incrementally reduced within the Plan Area, compared to those with the Plan, because the Reduced Heights Alternative would result in about 14 percent less residential growth and about 12 percent less employment growth in the Plan Area by 2040 than is assumed under the Plan (p. VI-27, VI-28). A summary of the impacts and percent reduction (if applicable) the Alternative would result in are provided in the table below.

Reduced Heights Alternative Impact Reductions

Impact	Percent Reduction from Proposed Plan
Transit Ridership	*(8%)*
Pedestrian and Bicycle Operations	*(8%)*
Pedestrian Crowding in Crosswalks	*Significantly Reduced*
Bicycle Travel	*Significantly Reduced*
Demand for Off-Street Freight Loading Spaces	*Significantly Reduced*
On-Street Commercial Loading Spaces	*Significantly Reduced*
Curb Space for Passenger Loading/Unloading Zones	*Significantly Reduced*
Parking Demand	*(10%)*
Construction Activities	*Significantly Reduced*
Emissions of Criteria Air Pollutants, Greenhouse Gases (GHGs), and Traffic-Generated Toxic Air Contaminants (TACs)	*Significantly Reduced*

"Our analysis demonstrates that the Reduced Heights Alternative would significantly reduce many of the Plan's air quality, traffic, and pedestrian safety impacts. While this Alternative proposes less development, it would still satisfy all of the Plan's eight goals. In fact, due to the Reduced Heights Alternative's reductions in air quality, traffic, and pedestrian safety impacts, it can be reasonably assumed that this alternative would better satisfy these eight goals when compared to the proposed Plan. This Alternative would still 'increase the capacity for jobs and housing,' but would better 'provide safe and convenient transportation that prioritizes walking, bicycling, and transit,' and would create a more 'environmentally sustainable and resilient neighborhood' when compared to the proposed Plan (p. II-5, II-6). Due to these reasons, we find that implementation of the Reduced Heights Alternative would significantly reduce the Plan's air quality, traffic, and pedestrian safety impacts, and would better satisfy the Plan's goals and objectives. Therefore, this Alternative should be considered in an

updated DEIR in order to reduce the severity of the Plan's significant and unavoidable impacts." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.58])*

Response AL-2

The comments include a statement that the Reduced Heights Alternative would satisfy all of the Plan's eight goals better than the proposed Plan. This statement addresses the merits of the Plan, and it does not address the adequacy or accuracy of the Draft EIR.

The comments also include a statement that the Draft EIR analysis of alternatives should identify the Reduced Heights Alternative as the environmentally superior alternative for the reasons presented in the comment, including a statement that the Reduced Heights Alternative would significantly reduce air quality and traffic impacts when compared to the proposed Plan; would specifically avoid the Plan's significant impacts on Muni capacity utilization under some cumulative conditions; and would significantly reduce the Plan's significant impacts with respect to pedestrian crowding in crosswalks under some conditions

Selection of Environmentally Superior Alternative

As discussed above in Response AL-1, p. RTC-274, an EIR must analyze a range of reasonable alternatives to the project that would avoid or substantially lessen any significant effects of the project (CEQA Guidelines Section 15126.6). The comments include a table summarizing the differences between the Central SoMa Plan and the Draft EIR alternatives; in some cases, this summary does not accurately characterize the reduction in impact that certain alternatives represent. The table describes the impacts associated with alternatives as less than, similar to, or greater than the impacts that would be associated with the Plan pursuant to the descriptions in Draft EIR Table S-3, Comparison of the Environmental Impacts of the Plan to the Impacts of Alternatives, p. S-58. While many of the impacts associated with the Central SoMa Plan would be reduced under the Reduced Heights Alternative, none of the Plan's significant and unavoidable impacts would be reduced to a less-than-significant level under the Reduced Heights Alternative. The table incorrectly shows that the Reduced Heights Alternative would reduce significant and unavoidable impacts to less than significant for the following topics: transit; pedestrians; loading; construction-related transportation impacts; cumulative transit, pedestrian, and loading impacts; traffic noise; construction noise; cumulative traffic noise; criteria air pollutants; $PM_{2.5}$ and TACs; cumulative criteria air pollutants and $PM_{2.5}$ and TACs; and wind. As shown in Table S-3, the significant and unavoidable impacts for these topics would remain significant and unavoidable under the Reduced Heights Alternative.

Overall, the Land Use Plan Only Alternative would result in the greatest level of avoidance and substantial reduction of significant and unavoidable environmental impacts of the Plan among the alternatives evaluated and was, therefore, identified as the environmentally superior alternative. Whereas the Reduced Heights Alternative would not reduce any impacts that would be significant and unavoidable under Plan development to a less-than-significant level, under the Land Use Plan Only Alternative, six impacts that would be significant and unavoidable under Plan development (related to traffic noise and on-street loading) would be avoided (i.e., reduced to a less-than-significant level). As stated on Draft EIR p. S-78, the Land Use Plan Only Alternative would result in incrementally higher VMT than the Plan and incrementally greater potential for

traffic/bicycle/pedestrian conflicts than the Plan. The Land Use Plan Only Alternative would also result in other significant effects related to transit and pedestrians that would require implementation of mitigation measures.

In addition, the comments cite two court cases that address the analysis of EIR alternatives (*Citizens of Goleta Valley v. Bd. of Supervisors* [1988] 197 Cal.App.3d 1167, 1180-81; and *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322) to support the statement that an agency must approve the environmentally superior alternative unless the alternative is infeasible. However, neither of these two court decisions supports this contention. In *Citizens of Goleta Valley*, the court held that, where the EIR did not contain substantial evidence supporting a conclusion that an alternative project was economically infeasible, the agency improperly found that alternative to be economically infeasible. Similarly, in *Burger*, the court held that a county board of supervisors improperly approved a project without considering the environmental concerns raised in the EIR and without making findings of overriding social or economic concerns, and where there was no substantial evidence showing that the smaller alternative project was infeasible. Neither case required an agency to adopt the environmentally superior alternative. CEQA does not require the lead agency to select and implement the environmentally superior alternative. While CEQA states that "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects," nevertheless, "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (CEQA Section 21002). An EIR does not and cannot implement a proposed project or an alternative. Rather, the EIR is an informational document. Adoption or rejection of a proposed project or an alternative is within the jurisdiction of the decision makers (in this case, the Board of Supervisors, upon the recommendation of the Planning Commission). The decision makers will determine whether any of the alternatives analyzed in the Draft EIR are feasible, based on "specific economic, social, or other conditions." The decision makers must adopt specific findings in support of their determination, based on substantial evidence in the record (CEQA Section 21081; CEQA Guidelines Section 15091).

Impacts of the Reduced Heights Alternative

The comments state the Reduced Heights Alternative would avoid the Plan's significant impacts on Muni capacity utilization on some screenlines and corridors under the existing plus Plan and the 2040 cumulative conditions; would significantly reduce the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions; and would significantly reduce air quality and traffic impacts as compared to the proposed Plan. These comments do not accurately characterize the significance of impacts described in the Draft EIR, nor do they provide evidence or analysis to support different conclusions from those presented in the Draft EIR. The comments are correct regarding the Reduced Heights Alternative's avoidance of the Plan's significant impacts on Muni capacity utilization under some conditions; however, as stated on Draft EIR p. VI-25, the Reduced Heights Alternative would also result in delays for Muni buses under the same existing plus Reduced Heights Alternative and 2040 cumulative conditions. Therefore, although the Reduced Heights Alternative would reduce some aspects of the Plan's significant and unavoidable transit impacts, impacts on transit would remain significant and unavoidable with mitigation under this alternative, as they would under Plan implementation. The comments also do not accurately characterize impacts with respect to pedestrian crowding in crosswalks. Under the existing plus Reduced Heights Alternative and 2040 cumulative conditions, the Reduced Heights Alternative would not avoid the Plan's

significant and unavoidable impacts, as discussed on Draft EIR p. IV-25. Similarly, other impacts related to traffic and air quality would be incrementally reduced under the Reduced Heights Alternative, but all impacts on traffic or air quality that would be significant and unavoidable under the Central SoMa Plan would also be significant and unavoidable under the Reduced Heights Alternative. Therefore, for the reasons discussed above and on Draft EIR pp. VI-67 and VI-68, the Draft EIR identifies the Land Use Only Alternative as the environmentally superior alternative.

Comment AL-3: Support for Alternatives Identified in the Draft EIR

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

A-CPC-Moore.3
O-CSN-1.1
O-CSN-1.3
O-CSN-1.39
O-CSN-2.1
O-CSN-2.3
O-SFRG-2.2
I-Margarita.3
I-Meader.1
I-Patterson.1

"And I'd like the discussion of views to be augmented by discussion on urban form, particularly reflecting on the guidelines of the Downtown Plan.

"The work we have done prior to 2013 and in preparation for today's EIR indeed spoke about a mid-rise solution. And it is in the smorgasbord that Mr. Wertheim discussed several times in front of us, where people were layering it up and ultimately, I assume the response we're seeing is the high-rise alternative which I believe has push back on many more than one front.

"And the Urban Design Plan and the modeling of the alternatives in the larger context of the Urban Design Plan are personally very important for me and require further vetting in this plan." *(Kathrin Moore, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Moore.3])*

"I am writing on behalf of the Central SoMa Neighbors (CSN) and SFBlu concerning the draft environmental impact report (DEIR) for the Central SoMa Plan. CSN and SFBlu (collectively, 'Neighbors') urge the Planning Commission to adopt the Reduced Height Alternative, (known as the Mid-Rise Alternative in the Central Corridor Plan). The Mid-Rise Alternative would allow for a dramatic increase in residential and office development in the area, while still maintaining building heights of 130 feet or less (with some exceptions at transit hubs), thus retaining a pedestrian scale, livability, access to light, air and open space, and creating a family-friendly neighborhood. By contrast, the High-Rise alternative (identified simply as the 'Plan' in the DEIR ('Plan' or 'Project')), would create vastly higher building heights of up to 350 feet, which would be out-of-scale with a mixed-use residential neighborhood, casting shadows, blocking views, creating wind tunnels and

essentially transforming the neighborhood into a second financial district. As longtime residents of Central SoMa, the Neighbors urge the Planning Commission to adopt the Mid-Rise Alternative since it protects neighborhood character, while allowing for almost as much job growth and housing as the High-Rise Alternative." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.1])*

"The Mid-Rise (Reduced Height) Alternative is superior to the High-Rise Alternative in almost every respect. It will create a family-friendly environment with access to light and air. It will create less traffic congestion, and therefore less air pollution and related health effects, and less traffic-related pedestrian injuries. It will allow tall buildings, but clustered near BART on the north side and Caltrain on the south side of the neighborhood, thereby encouraging use of public transportation. The Mid-Rise Alternative would also have reduced greenhouse gas (GHG) impacts since recent research shows that mid-rise buildings are generally more energy efficient than high-rise. By contrast, the High-Rise alternative includes extremely tall buildings (350 feet) on Harrison Street, between Second and Third Streets, which is not close to the Caltrain or BART stations, but is close to the Bay Bridge freeway ramps – thereby encouraging automobile commuting rather than public transit. This contradicts the Plan itself, which 'would seek to retain the character of the mid-rise district, limiting the presence of high-rises to areas near transit stations.' (DEIR, p. IV.B-34).

"The Mid-Rise Alternative allows for almost as much growth as the High-Rise Alternative. The Initial Study for the Central SoMa Plan (p. 81) shows that the Mid-Rise Alternative is projected to add 52,300 new jobs by 2040, while the High-Rise option is projected to add 56,400 new jobs. The difference in the additional population increments is even smaller, 22,700 versus 23,400 (a 3% difference). Although the DEIR presents slightly different projections, there is still only about a 12-14% difference between the Reduced Height Alternative and the Plan (population growth of 21,900 versus 25,500; job growth of 55,800 versus 63,600). (DEIR p. VI-2, VI-16, IV-6). Thus, the Mid-Rise Alternative would achieve about 90% of the jobs and housing growth, while maintaining the character of Central SoMa as a mid-rise community with access to light and air, avoiding wind-tunnels, and promoting a more family-friendly environment.

"Indeed, in 2013 when the Plan was known as the Central Corridor Plan, City Planning staff articulated all of the right reasons for supporting the Mid-Rise Alternative. The Central Corridor Plan stated:

> 'Urban design experience shows that people feel most comfortable on urban streets where the height of buildings is between ¾ and 1 ¼ times the width of the street, creating an "urban room" that has a pleasing, but not overwhelming, sense of enclosure and intimacy. The Plan proposes that the base height limits along all major streets in the Plan area should be 85 feet, lowering to 65 feet toward the western edge of the Plan area and in historic areas, such as the South End and near South Park. While in some areas the Plan proposes to allow buildings to rise above the 85-foot base height (generally to 130 feet), these upper stories would be required to set back by at least 15 feet in order to maintain the perception of the lower streetwall…. This scale is also consistent with both the traditional form and character of SoMa's significant commercial and industrial buildings as well as aligning with the desire for larger floorplate, open floorplan, mid-rise buildings most desired by contemporary new economy companies.[1]
>
> 'PRINCIPLE 2: The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.
>
> 'The South of Market sits at a critical location in the city's landscape. SoMa is a large expanse of flat land at the center of the east side of the City, sitting as an important balance and counterpoint to the dramatic

> hills that surround it, including the man-made "hill" of the downtown high-rise district, creating a dramatic amphitheater.
>
> 'With relatively low buildings in comparison to the hills and high-rises around it, the South of Market allows expansive and cherished views to extend across it to and from the surrounding hills, districts and the major features of the region beyond. In order to preserve this essential characteristic and preserve views across the area, height limits taller than 130 feet are generally kept to the southern portion of the Plan Area (Brannan Street southward), limited in distribution and widely spaced. It is important to note that mid-rise buildings are not necessarily synchronous with low densities… Because the number of potential buildings taller than 130 feet is limited to strategic locations adjacent to transit stations and their locations generously spaced, these buildings will be prominent from all directions and serve as local landmarks.[2]

"The Neighbors agree entirely with the opinions set forth by City Planning Staff in 2013 in the Central Corridor Plan. **'The predominant character of SoMa as a midrise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.'** The Mid-Rise Alternative creates an urban neighborhood 'that has a pleasing, but not overwhelming sense of enclosure and intimacy.' The Mid-Rise Alternative achieves almost all of the housing and job growth, while maintaining a family-friendly, livable neighborhood. We urge the Planning Commission to direct staff to revise the DEIR to select the Mid-Rise (Reduced Height Alternative) as the environmentally preferred alternative, consistent with the staff opinions set forth in the Central Corridor Plan only three short years ago."

Footnotes:
[1] Central Corridor Plan, p. 30.
[2] Id. p. 32.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.3])

"**CONCLUSION.**

"The DEIR is woefully inadequate. A revised and recirculated draft EIR will be required to remedy the myriad defects in the document. The revised draft EIR should identify the Reduced Height (Mid-Rise) Alternative as the environmentally superior alternative, and consider it on equal footing to the Plan, as was done in the Central Corridor Plan. The City should also consider an alternative that limits building height to no more than 130 feet in the block bounded by I-80 and Folsom, and Second and Third Streets, and places a park at the current parking lot located at 350 Second Street. This modification will make the Plan much more consistent with the goals to limit tall buildings to the area near Caltrain and BART, while maintaining the mid-rise character of the rest of the neighborhood, and increasing much needed open space." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.39])*

"We urge the Planning Commission to reconsider this EIR to favor the mid-rise alternative rather than the high-rise alternative. And I want to emphasize, our -- the Central SoMa Neighbors are not opposed to development. The mid-rise alternative would allow approximately 90 percent of the job growth and housing growth as the high-rise alternative but maintain a livable, family-friendly community on a pedestrian scale with access to light and air and open space, all the things which make this neighborhood attractive today." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Hearing Transcript, January 26, 2017 [O-CSN-2.1])*

"Now, I want to emphasize, the mid-rise alternative still allows some tall buildings, but they're clustered at the north and the south end of the development area, around the BART station and the Caltrans Station. This both allows high-rise development where it's appropriate for offices, but also it encourages the use of public transportation rather than putting high rises on Harrison Street, which is not readily accessible to major public transit routes.

"We think that it's important for this neighborhood to retain a family-friendly character as Supervisor Yee is now promoting. And this area, although it is one of the most ethnically and economically diverse in the City, it has one of the highest indices of ethnic diversity, it has slightly higher incomes than the average for the City but also about twice the level of poverty.

"It faces challenges like high crime rates, the least open space in the City, pedestrian safety issues, and about twice the level of air pollution as the average for the City and about twice the level of asthma. The mid-rise alternative addresses all these issues far better than the high-rise alternative. And we urge the Planning Commission to direct staff to emphasize the mid-rise alternative rather than high-rise development in this area. Thank you." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Hearing Transcript, January 26, 2017 [O-CSN-2.3])*

"Now, our Community Plan would require that the eight major development sites, the big commercial sites in Central SoMa, all be required to have on-site childcare facilities included in those projects for both their workers and residents." *(John Elberling, San Franciscans for Reasonable Growth, Hearing Transcript, January 26, 2017 [O-SFRG-2.2])*

"Thankfully, the Draft EIR also explores the impacts of the mid-rise option now renamed 'Reduced Height Alternative.'

"To my dismay, it also dismisses it as an inferior environmental option, even though it meets all criteria and will develop the neighborhood at the right scale and with less environmental consequences than Central SoMa Alternatives. Why is it that the Central SoMa Plan has developers' interests in mind? Why is SF Planning not protecting the interests of residents in the area? Why do you want to encourage even more cars by building parking lots right next to the highway? Why do you want to turn our neighborhood into a dead office park? We don't need another financial district.

"We want the area to focus on livability, light, air, and open spaces. We want a safe, dense, urban, walkable, and connected neighborhood that preserves and enhances the wonderful, historic architecture and balances residential, office, and retail uses.

"Please direct staff to adopt the mid-rise alternative, which is now named the reduced height alternative, as the preferred alternative. The mid-rise alternative will provide almost as much jobs and residential growth, while preserving livability and enhancing the neighborhood we love. Help our neighborhood thrive." *(Margarita,[104] Hearing Transcript, January 26, 2017 [I-Margarita.3])*

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[104] Margarita did not provide her last name during the hearing.

"My overall thing is I think that there's going to be plenty of growth in San Francisco, even under the no-project alternative plan there's going to be growth, and I think about maybe 50 percent of what's thought of under plan.

"High rises down there are simply inappropriate. It's the Manhattanization of SoMa, which has always been a low-rise, medium-rise area in the past, and I think should continue that way.

"Just judging from the traffic that gets on the Bay Bridge every day, I get a horn concerto outside my window, starting usually about one o'clock in the afternoon, lasting for hours. If that's translated into the rest of the SoMa area, I think it's going to be a total disaster, frankly. So my preferred thing would be the no-project alternative.

"The no-project alternative avoids, what, seven of the significant and unavoidable plan and/or cumulative impacts regarding traffic noise and other things. There will be growth. I just don't think it needs to be these high rises that go up for hundreds and hundreds of feet, especially not at Harrison, like the former gentleman was talking about." *(Arthur Meader, Hearing Transcript, January 26, 2017 [I-Meader.1])*

"I strongly object to the even higher High - Rise Alternative released in August 2016. It seems that Second Street is being singled out for huge high-rises for no apparent reason. This will affect light and air, not to mention further traffic and congestion. This will make the neighborhood less attractive and accessible.

"The point of a rational development plan should be livability and a reasonable mix of housing - especially affordable housing - office space, and businesses, balanced to create a livable environment which includes housing for middle-class San Franciscans. The Mid - Arise Alternative [Reduced Heights Alternative] comes far closer to achieving these goals. The city should not deviate from that plan, including along Second Street." *(Richard North Patterson, E-Comment, December 18, 2016 [I-Patterson.1])*

Response AL-3

These comments support various alternatives studied in the Draft EIR and address the Plan and its merits. The comments include the following statements:

- Concern that the Reduced Heights Alternative would be dismissed by the Planning Department as an environmentally inferior Plan option, and a request that the Reduced Height Alternative (which is also referred to as the Mid-Rise Alternative in the Central Corridor Plan) be adopted instead of the Plan;
- Preference for the Reduced Heights Alternative;
- Growth under the No Project Alternative would represent about 50 percent of the growth projected under the Plan;
- High rises (i.e., development with a high level of density) are inappropriate for the Plan Area;
- The Reduced Height (Mid-Rise) Alternative should be identified as the environmentally superior alternative;
- Preference for the No Project Alternative; and
- Preference for the Modified TODCO Plan's desire for the Plan to include a requirement that on-site childcare facilities be provided within major development sites in the Plan Area.

These comments do not otherwise address the adequacy or accuracy of the Draft EIR. The decision makers will consider the alternatives studied in the Draft EIR and may choose to adopt any of the Draft EIR alternatives in lieu of the proposed Plan. The statement that growth under the No Project Alternative would represent about 50 percent of the growth projected under the Plan is incorrect—growth under the No Project Alternative would represent approximately 64 percent of the growth of households and population, and approximately 43 percent of the growth of jobs projected to occur under the Central SoMa Plan. The statement that the Plan would result in the development of parking lots near freeways is also not accurate, as development of parking lots in the Plan Area is not part of the proposed Plan. The comments also state that the City should consider an alternative that limits building height to no more than 130 feet in the block bounded by I-80, Folsom Street, Second Street, and Third Street, and that locates a park at the current parking lot located at 350 Second Street. For a discussion of an alternative that limits building height to no more than 130 feet in the block bounded by I-80, Folsom Street, Second Street, and Third Street, see Response AL-1, p. RTC-274. For a discussion of the environmentally superior alternative, see Draft EIR pp. VI-67 and VI-68 and Response AL-2, p. RTC-286. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

D.15 Cumulative Impacts

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

- Comment CU-1: Add Projects with Preliminary Project Applications (PPAs) to Cumulative List
- Comment CU-2: Address 5M Project in Cumulative Analysis
- Comment CU-3: Cumulative Transportation and Air Quality Analysis
- Comment CU-4: Transbay Joint Powers Authority Bus Facility

Comment CU-1: Add Projects with Preliminary Project Applications (PPAs) to Cumulative List

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

I-Hestor-1.12

"**Project Location - IIC.** To understand cumulative development projected in Central SoMa plan area, a list of PPAs in that area with description of proposed height and projected size, including number of parking spaces. Since the area for transportation and related areas includes a broader area - Market to Townsend, 11th St to The Embarcadero - please also provide PPA information PLUS the same information for projects undergoing environmental review or which have been approved since the Central Corridor plan was initiated in early 2011." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.12])*

Response CU-1

The comment indicates that a list of projects for which Preliminary Project Assessments (PPAs, a type of initial feedback provided by the Planning Department on a development proposal larger than a certain size) have been prepared should be included in the cumulative analysis scenario. CEQA requires analysis of cumulative impacts, or two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. As stated in CEQA Guidelines Section 15355, "A cumulative impact is the change in the environment which results from the incremental impact of the project when added to the impacts of other closely related past, present, and reasonably foreseeable future projects." A list of large-scale individual cumulative projects, some of which have been approved and some of which are currently undergoing environmental review, are included in the Draft EIR analysis starting on p. IV-11. However, this list does not represent the totality of cumulative projects considered in the Draft EIR. A PPA also does not constitute an application for development with the Planning Department; therefore, projects for which a PPA has been submitted are not considered reasonably foreseeable. Therefore, inclusion of projects in the cumulative analysis for which only a PPA has been submitted would be speculative, and CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145). Also see Response CU-3, p. RTC-305, for a discussion of

the cumulative projects that were considered in the Draft EIR. Therefore, revisions to the Draft EIR to address the comment are not required.

Comment CU-2: Address 5M Project in Cumulative Analysis

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

O-SOMCAN-Cabande.10

"**7. The 5M Project Must be Included in the DEIR Analysis**

"The DEIR has moved 5M from being 'Plan-induced growth to cumulative growth' per footnote on p. IV-5. The problem is that 5M is the largest single development within the boundaries of the Central SoMa Plan Area. It created new rules for development (its own Special Use District) that were based on recommendations from a draft version of the Central SoMa Plan.

"Furthermore, new development in the Central SoMa Plan Area is being proposed in this Plan at a scale that is conversely driven by the scale of development that Planning pushed to approve for 5M. With 5M being the largest single development in Central SoMa, they must be considered together in the Central SoMa Plan. They have linked, not dissociated as separate, cumulative impacts. 5M is not built and its construction timeline is not clear. 5M should be studied as a principal contributor to the environmental impacts of the Central SoMa Plan. The omission of any analyses of the impacts of the 5M project in the DEIR is a critical flaw of the DEIR." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.10])*

Response CU-2

The comment states that the Draft EIR must consider the impacts of the 5M project together with the impacts of the Plan in the Draft EIR. The comment correctly states that the development forecasts underlying the Draft EIR analysis were revised to change consideration of the 5M project from Plan-induced development to cumulative development. This change took place because, after revision of the Plan Area boundaries, the 5M project site was no longer located within the Plan Area, and the environmental impacts of the 5M project underwent a separate, project-level CEQA review. The comment implies that the Draft EIR does not consider the impacts of the 5M project along with the impacts of the Plan; however, the Draft EIR does include the 5M project in the cumulative project scenario (p. IV-11) and evaluates the combined/linked cumulative impacts of both the project and the Plan, as required by CEQA. Therefore, revisions to the Draft EIR to address the comment are not required.

Comment CU-3: Cumulative Transportation and Air Quality Analysis

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

O-CSN-1.19
O-CSN-1.36
O-CSN-1.57
O-CSN-1.63
I-Hestor-1.1

"**6. The Traffic Analysis Fails to Analyze Cumulative Impacts**.

"Traffic Engineer Smith concludes that the traffic analysis fails to include many reasonably foreseeable future projects, such as Pier 70 in the nearby Dogpatch neighborhood, and many others. These projects will have cumulative traffic impacts together with the Project, which are not analyzed or mitigated in the DEIR." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.19])*

"M. DEIR Fails to Adequately Analyze Cumulative Impacts.

"The DEIR has a patently inadequate cumulative impact section because it fails to consider the Plan's impacts together with almost 72 other projects that are reasonably foreseeable in the area. Clearly, the Plan's impacts will be much more significant when viewed together with these 72 other projects. SWAPE identifies 72 projects that are not accounted for in the DEIR, including the massive Pier 70 project, which will be in very close proximity to the Plan area (Dogpatch). Failure to analyze these cumulative projects renders the DEIR inadequate. (SWAPE Comment, p. 6-8).

"An EIR must discuss significant cumulative impacts. CEQA Guidelines section 15130(a). This requirement flows from CEQA section 21083, which requires a finding that a project may have a significant effect on the environment if 'the possible effects of a project are individually limited but cumulatively considerable. . . . 'Cumulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.' 'Cumulative impacts' are defined as 'two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.' CEQA Guidelines section 15355(a). '[I]ndividual effects may be changes resulting from a single project or a number of separate projects.' CEQA Guidelines section 15355(a).

"'The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.' *Communities for a Better Environment v. Cal. Resources Agency* ('CBE v. CRA'), (2002) 103 Cal.App.4th 98, 117. A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable probable future projects whose impacts might compound or interrelate with those of the project at hand. 'Cumulative impacts

can result from individually minor but collectively significant projects taking place over a period of time.' CEQA Guidelines § 15355(b).

> As the court stated in CBE v. CRA, 103 Cal. App. 4th at 114:
>
> Cumulative impact analysis is necessary because the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.

"(Citations omitted).

"In *Friends of Eel River v. Sonoma County Water Agency*, (2003) 108 Cal. App. 4th 859, the court recently held that the EIR for a project that would divert water from the Eel River had to consider the cumulative impacts of the project together with other past, present and reasonably foreseeable future projects that also divert water from the same river system. The court held that the EIR even had to disclose and analyze projects that were merely proposed, but not yet approved. The court stated, CEQA requires 'the Agency to consider "past, present, and probable future projects producing related or cumulative impacts . . . ." (Guidelines, § 15130, subd. (b)(1)(A).) The Agency must interpret this requirement in such a way as to 'afford the fullest possible protection of the environment.' *Id*., at 867, 869. The court held that the failure of the EIR to analyze the impacts of the project together with other proposed projects rendered the document invalid. 'The absence of this analysis makes the EIR an inadequate informational document.'" *Id*., at 872.

"A revised DEIR is required to consider the impacts of the Plan together with other reasonably foreseeable projects, including Pier 70." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.36])*

"***Failure to Consider Impacts from Other Projects Within the Area***

"Not only does the DEIR rely upon outdated baseline data to determine the Plan's air quality impacts, but it also fails to account for impacts from other development projects within the area. As a result, the Plan's net increase in criteria air pollutants within the area, as well as it's cumulative air quality impact, are misrepresented.

"The proposed Pier 70 Mixed-Use District Project, which is adjacent to the Central SoMa Plan area, comprises a project site of an approximately 35-acre area bounded by Illinois Street to the west, 20th Street to the north, San Francisco Bay to the east, and 22nd Street to the south.[3] The project site contains two development areas: the 28-Acre Site and the Illinois Parcels. Development of the 28-Acre Site would include up to a maximum of approximately 3,422,265 gross square feet (gsf) of construction in new buildings and improvements to existing structures (excluding square footage allocated to accessory parking). Development of the Illinois Parcels would include up to a maximum of approximately 801,400 gsf in new buildings; these new buildings would not exceed a height of 65 feet, which is the existing height limit along Illinois Street on both the Port-owned and the western portion of the Hoedown Yard.

"According to the Pier 70 Mixed-Use District Project's DEIR, the Pier 70 Project would result in ten significant and unavoidable impacts. 'It would:

- Cause one individual Muni route (48 Quintara/24th Street bus routes) to exceed 85 percent capacity utilization in the a.m. and p.m. peak hours in both the inbound and outbound directions;
- Cause loading demand during the peak loading hour to not be adequately accommodated by proposed on-site/off-street loading supply or in proposed on-street loading zones, which may create hazardous conditions or significant delays for transit, bicycles, or pedestrians;
- Contribute considerably to significant cumulative transit impacts on the 48 Quintara/24th Street and 22 Fillmore bus routes;
- Cause a substantial temporary or periodic increase in ambient noise levels during construction in the project vicinity above levels existing without the project;
- Cause substantial permanent increases in ambient noise levels in the project vicinity (22nd Street [east of Tennessee Street to east of Illinois Street]; and Illinois Street [20th Street to south of 22nd Street]);
- Combine with cumulative development to cause a substantial permanent increase in ambient noise levels in the project vicinity (22nd Street [east of Tennessee Street to east of Illinois Street] and Illinois Street [20th Street to south of 22nd Street]);
- Generate fugitive dust and criteria air pollutants during construction, which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants;
- Result in operational emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants; and
- Combine with past, present, and reasonably foreseeable future development in the project area to contribute to cumulative regional air quality impacts.'[4]

As you can see in the excerpt above, the Pier 70 Project would result in significant and unavoidable impacts to air quality, pedestrian safety, and traffic. These significant and unavoidable impacts, combined with the proposed Plan's significant air quality, pedestrian safety, and traffic impacts, would result in significant and unavoidable cumulative air quality, pedestrian safety, and traffic impacts, something that the DEIR fails to adequately address. In addition to the Pier 70 Project, there are approximately 72 additional development projects in San Francisco that are currently being considered by the Planning Commission, some of which would also contribute to the Plan's already significant impacts (see table below).[5]

List of Major Development Projects in San Francisco	
Project	**Address**
1629 Market Street Mixed-Use Project	1629 Market Street
1027 Market Street Project	1028 Market Street
950-974 Market Street Project	950-974 Market Street
One Oak Street Project	1500-1540 Market Street
1499 Mission Street Project	1500 Mission Street
299 Grant Avenue Project	300 Grant Avenue
1000 Van Ness Avenue Project	1001 Van Ness Avenue
1269 Mission Street Project	1270 Mission Street

List of Major Development Projects in San Francisco	
Project	**Address**
India Basin Mixed-use Project	700-900 Innes Avenue
1979 Mission Street Mixed-Use Project	1979 Mission Street
901 16th Street & 1200 17th Street Project	901 16th Street & 1200 17th Street
1828 Egbert Avenue Project	1828 Egbert Avenue
Better Market Street Project	Market Street & Octavia Boulevard
Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project	East of US-101
1065 Market Street Project	1066 Market Street
240-290 Pacific Avenue / 720 Battery Street Project	240-290 Pacific Avenue / 720 Battery Street
837 Pacific Avenue Project	838 Pacific Avenue
2293-2299 Powell Street/309-311 Bay Street Project	2293-2299 Powell Street/309-311 Bay Street
Golden State Warriors Event Center and Mixed-Use Development	Mission Bay Blocks 29-32
1601 Mariposa Street Mixed Use Project	1602 Mariposa Street
400 Bay Street Hotel Project	401 Bay Street
1074 Market Street Project	1075 Market Street
5M Project	925-967 Mission Street
Jewish Home of San Francisco	302 Silver Avenue
525 Harrison Street (Case No. 2000.1081E; State Clearinghouse No. 1984061912)	525 Harrison Street
West Wing Project	501 Tunnel Avenue
75 Howard Street Project	75 Howard Street
949 Gough Street Project	950 Gough Street
1546-1564 Market Street Project	1546-1564 Market Street
100 Hyde Street Project	101 Hyde Street
1499 Mission Street Project	1500 Mission Street
Mason and Turk Residential Mixed-Use Project	19-25 Mason Street
2501 California Street Project	2501 California Street
800 Indiana Street Project	800 Indiana Street
689 Market Street Project	690 Market Street
109 The Embarcadero/115 Steuart Street Project	110 The Embarcadero/115 Steuart Street
1480 Post Street/ 1333 Gough Street Project	1481 Post Street/ 1333 Gough Street
1527-1545 Pine Street Mixed-Use Project	1527-1545 Pine Street
1634-1690 Pine Street Project	1634-1690 Pine Street
Seawall Lot 337 and Pier 48 Mixed-Use Project	Pier 48 & Seawall Lot 37
465 Tehama/468 Clementina Street Project	465 Tehama/468 Clementina Street
651-655 Dolores Street Project	651-655 Dolores Street
199 Paul Avenue Project	200 Paul Avenue
74 Howard Street Project	75 Howard Street
200-214 6th Street Project	200-214 6th Street
1784 15th Street Project	1785 15th Street
927 Toland Street Project	928 Toland Street
The Mexican Museum and Residential Tower Project	706 Mission Street
100 Polk Street Project	101 Polk Street

List of Major Development Projects in San Francisco	
Project	**Address**
344 Brannan Street Project	345 Brannan Street
248-252 9th Street Project	248-252 9th Street
Seawall Lot 351 Project	8 Washington Street
801 Brannan and One Henry Adams Streets Project	801 Brannan & 1 Henry Adams Streets
1320 Mission Street Project	1321 Mission Street
2550-2558 Mission Street Project	2550-2558 Mission Street
1510-1540 Market Street Project	1510-1540 Market Street
Strand Theater	1127 Market Street
479 Potrero Avenue Project	480 Potrero Avenue
2894 San Bruno Avenue Project	2895 San Bruno Avenue
751 Carolina Street Project	752 Carolina Street
1000-1020 Broadway & 1629 Taylor Street Project	1000-1020 Broadway & 1629 Taylor Street
Chinese Hospital Replacement Project	835–845 Jackson Street
3151-3155 Scott Street Project	3151-3155 Scott Street
Booker T. Washington Community Center Mixed Use Project	800 Presidio Avenue
Restaurant Depot	2121 and 2045 Evans Street
2001 Market Street Mixed-Use Development	2001 Market Street
748 Wisconsin Street Project	749 Wisconsin Street
221 Second Street Project	222 Second Street
49 First Street Project	50 First Street
739 Washington Street Project	740 Washington Street
690 Stanyan Street (Mixed Residential/Retail Project)	690 Stanyan Street
255 Seventh Street Project	255 Seventh Street

"Our analysis demonstrates that the proposed Plan, in combination with the various development projects currently being considered by the City, would result in a cumulatively considerable significant air quality, pedestrian safety, and traffic impact. As a result, we find the DEIR's conclusion of a less than significant air quality impact to be incorrect, and maintain that the proposed Plan, in combination with other development projects within the area, would have a significant impact on local and regional air quality."

Footnotes:

[3] Pier 70 Mixed-Use District Project DEIR, p. 2.1-2.2, *available at:* http://sf-planning.org/environmental-impact-reports-negative-declarations

[4] Pier 70 Mixed-Use District Project DEIR, p. S.5-S.6, available at: http://sf-planning.org/environmental-impact-reports-negative-declarations

[5] http://sf-planning.org/environmental-impact-reports-negative-declarations

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.57])

"**It Is Unclear What Recent and Concurrent Projects Are Included In the Transportation Analysis of the Existing and 2040 Project and No Project Analysis Scenarios**

"The DEIR fails to identify how or whether large recent and concurrent projects are included in the 2040 analyses. Examples concern such projects as the massive Pier 70 Project, the Salesforce Tower, the Warriors Arena Project and the Project, additional development in Mission Bay and many other projects near the Central

SoMa. The DEIR must clarify how each project that is approved and recently occupied or approved but still under construction or still under review but at a stage of reasonable certainty is (or is not and why not) treated in the analysis" *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.63])*

"Construction effects of improvements to existing residents, pedestrians, and bicyclists, in particular on air quality, pedestrian and bicyclist hazards during construction of Central SoMa projects and related 'improvements [should also be addressed in the Central SoMa Plan EIR].'" *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.1])*

Response CU-3

The comments indicate that the Draft EIR cumulative impact analysis is inadequate because it does not analyze cumulative impacts from projects, such as Pier 70 and a list of other "Major Development Projects in San Francisco," and does not identify cumulative impacts on traffic, air quality, and pedestrian/bicyclist safety as significant. These comments are incorrect. As explained in further detail below, the Draft EIR does consider the Pier 70 project and other development projects in its cumulative impact analysis, as applicable, and does identify significant and unavoidable cumulative impacts related to transit, pedestrians, and loading, as well as significant but mitigable impacts on emergency vehicle access. The Draft EIR also identifies significant and unavoidable cumulative impacts related to regional air quality and localized air quality health risks.

Cumulative Impact Analysis Approach

As noted on Draft EIR p. IV-11, CEQA Guidelines Section 15130(b)(1) identifies two approaches to analyzing cumulative impacts: either a list-based approach or a projections-based approach. Cumulative impact analysis in San Francisco generally employs both a list-based approach and a projections-based approach, depending on which approach best suits the individual resource topic being analyzed. For topics such as aesthetics and shadow, the analysis typically considers large, individual projects that are anticipated in the project area. By comparison, and as described below, the transportation analysis relies on a citywide growth projection model that also encompasses individual projects anticipated in the project vicinity. Factors considered in determining which cumulative projects to consider in an EIR include the resources affected, the geographic scope and location relative to the affected resource, and the timing and duration of implementation of the proposed and cumulative projects. The Draft EIR follows the City's standard methodology for cumulative analysis and employs both approaches as necessary, depending on which approach best suits the environmental topic being analyzed. For example, the Draft EIR describes the approach to the cumulative impact methodology and includes a list of "large-scale" cumulative projects (starting on p. IV-11), but it also identifies additional cumulative projects as appropriate in other parts of the document, including Section IV.D, Transportation and Circulation, pp. IV.D-85 to IV.D-87. For transportation and topics that are derived from the quantitative transportation analysis (e.g., noise and air quality), the Draft EIR relies on a combination of the projections-based and list-based approaches to cumulative analysis, consistent with City practice for CEQA environmental review.

Cumulative Impact Analysis: Transportation

Pursuant to the requirements of the Planning Department's "Transportation Impact Analysis Guidelines for Environmental Review," the cumulative transportation impacts analysis was conducted for 2040 conditions. Year 2040 was selected as the future analysis year because 2040 is the latest year for which travel demand forecasts were available from the San Francisco County Transportation Authority San Francisco Chained Activity Modeling Process (SF-CHAMP) travel demand forecasting model. The model starts with regional population data and predicts person travel for a full day based on assumptions of growth in population, housing units, and employment, which are then allocated to different periods throughout the day, using time-of-day sub-models. Future 2040 cumulative traffic volumes and transit ridership were estimated based on cumulative development and growth identified by the SF-CHAMP travel demand model, using model outputs that represent existing conditions and model output for 2040 cumulative conditions that is validated and updated regularly with new projects and operating conditions.

The SF-CHAMP model divides San Francisco into 981 geographic areas, known as Traffic Analysis Zones (TAZs). The SF-CHAMP model estimates the travel demand based on TAZ population and employment growth assumptions initially developed by ABAG as part of its regional Sustainable Communities Strategy. The model also includes zones outside of San Francisco for which data is obtained through the current Metropolitan Transportation Commission (MTC) regional model. Within San Francisco, the Planning Department allocates ABAG's countywide growth forecast to each TAZ, based upon existing zoning and approved plans, using an area's potential zoning capacity, and the anticipated extent of redevelopment of existing uses. Thus, the transportation analysis is based on a summary of projections approach, but is also validated and refined to reflect known major projects, such as Pier 70, the Golden State Warriors' arena and office development, the 5M Project, the 706 Mission Street project, the San Francisco Giants' mixed-use project at Seawall Lot 337, the Candlestick Point–Hunters Point redevelopment project, the India Basin mixed-use project, and the 1500 Mission Street project, as well as several projects along Market Street in the general vicinity of the Plan Area (950–974 Market Street, 1028 Market Street, 1066 Market Street, 1075 Market Street, 1125 Market Street, 1546–64 Market Street, 1629 Market Street, and One Oak Street). Because the SF-CHAMP model is based on 2040 growth projections, it therefore also encompasses other development throughout San Francisco.

Concerning the list of projects provided in the comments, the list appears to be generated from the Planning Department Environmental Planning division website of published EIRs and mitigated negative declarations at the time the comment was written. The list of published CEQA documents dates back more than 10 years, to the Draft EIR for the 255 Seventh Street project, published on February 24, 2007. Along with several others among the projects listed in the comment, the 255 Seventh Street project was complete as of the time the NOP for the Plan EIR was issued in April 2013 and would, therefore, have been part of the environmental setting, not a cumulative future condition. Other completed projects include 690 Stanyan Street (although it entailed re-occupancy of an existing supermarket building and not the proposed mixed residential and retail project analyzed) and the Restaurant Depot expansion at 2045 Evans Avenue. Other projects were either never approved or were approved but have not been built (8 Washington Street [approval rescinded by voter referendum], 749 Wisconsin Street [not approved], 740 Washington Street [not approved], and 1000 Broadway [approved but unbuilt]). Still others were not "major" in the sense of generating substantial impacts (including but limited to the 3151–3155 Scott Street project, the 748 Wisconsin Street project, the 751 Carolina Street project, and the 479 Potrero Avenue project) that could combine with other projects, while others are too distant from

the Central SoMa Plan Area to combine with the proposed Plan to result in cumulative impacts. Some of these projects fall into more than one of the above categories. As noted above, the SF-CHAMP model explicitly incorporates growth assumptions for a number of major known and foreseeable development projects. Other, smaller projects are encompassed within the ABAG growth forecasts as distributed to San Francisco TAZs through the Planning Department's land use allocation process.

Based on the SF-CHAMP modeling and subsequent analysis of the model output, the Draft EIR identifies cumulative traffic impacts starting on p. IV.D-85 in Section IV.D, Transportation and Circulation, and includes the results of an assessment of the effects of development under the Plan and the proposed street network changes. The Draft EIR identifies significant and unavoidable cumulative impacts on transit, even with implementation of Mitigation Measures M-TR-3a, Transit Enhancements; M-TR-3b, Boarding Improvements; and M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets. The Draft EIR also identifies significant and unavoidable cumulative impacts on pedestrians, even with implementation of Mitigation Measure M-TR-4, Upgrade Central SoMa Crosswalks, as well as loading, even with implementation of Mitigation Measures M-TR-6a, Driveway and Loading Operations Plan, and M-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones. The Draft EIR also identifies significant but mitigable impacts on cumulative emergency vehicle access. With implementation of Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, the cumulative impact on emergency vehicle access would be reduced to a less-than-significant level.

With regards to cumulative pedestrian impacts, the comments indicate that impacts from the Pier 70 project would combine with Plan impacts to create significant and unavoidable pedestrian impacts. However, impacts on pedestrian safety are generally fairly localized, and the distance between the Plan Area and the Pier 70 project site (over one mile) makes such a combination of pedestrian-related impacts unlikely. Based on the results of the SF-CHAMP model and those Pier 70 transit trips that access their intended destination on foot within the Central SoMa Plan Area, the Plan Area's pedestrian analysis accounts for these Pier 70–generated pedestrian trips, because the Draft EIR's pedestrian analysis includes pedestrians walking to and from transit.

With regard to cumulative project construction impacts on pedestrians and bicyclists in the Plan Area, as noted on Draft EIR p. IV.D-109, "The combined impacts of implementation of the Plan, in combination with construction of other projects outside of the Plan Area, would not result in significant cumulative construction-related transportation impacts for the following reasons:

- Many of the identified cumulative projects are currently underway, and/or will be completed in the near term, prior to initiation of construction of development projects, open space improvements, or transportation projects under the Plan.
- Transportation-related construction impacts are typically located in the immediate vicinity of the construction activities, and are of limited duration (e.g., typically two to three years for development projects, and one to two years for street network changes).
- There are no forecasted developments, open space, or transportation projects in the vicinity of the Plan Area that would overlap in location and schedule, so as to result in significant disruptions to traffic, transit, pedestrians, or bicyclists."

In other words, if construction of a project is complete before construction of a subsequent development project in the Plan Area begins, construction of the two projects would not overlap and there would be no cumulative

construction-related transportation impact. Moreover, the relatively limited duration of construction on any given project where potential street network disruption could occur to the detriment of pedestrians and/or bicycles reduces the chances that two projects in close proximity would be undergoing major construction at the same time. As such, cumulative construction-related transportation impacts on pedestrian or bicycle circulation would be less than significant.

Therefore, as discussed above, comments stating that the Draft EIR does not identify significant and unavoidable cumulative impacts on traffic or pedestrian safety based on implementation of the Plan are not accurate. Comments stating that the Draft EIR does not address cumulative construction-related impacts on pedestrians and bicyclists are also not accurate. As such, revisions to the Draft EIR to address these comments are not required.

Cumulative Impact Analysis: Air Quality

As stated in the Draft EIR on p. IV.F-54, "BAAQMD considers criteria air pollutant impacts to be cumulative by nature." That is, "No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts."[105] Per BAAQMD guidance, if a project's emissions are above the project-level thresholds, the project would be considered to result in a considerable contribution to cumulatively significant regional air quality impacts. However, as explained in Response AQ-1, consistent with BAAQMD guidance, a land use plan such as the proposed Central SoMa Plan is not subject to BAAQMD project-level thresholds. Instead, a plan's effects are evaluated with respect to consistency with the applicable regional air quality plan, including whether the rate of increase in vehicle miles traveled (VMT) would be less than the rate of increase in population. Because the proposed Plan would be consistent with both the 2010 Clean Air Plan and the 2017 Clean Air Plan, and because it would result in lesser growth in VMT than in population, the Plan would not conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing or projected air quality violation; or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).[106]

However, as disclosed in Impact C-AQ-1, development under the Plan under cumulative 2040 conditions would contribute considerably to cumulative criteria air pollutant impacts because subsequent individual development projects could exceed project-level thresholds, even with implementation of the following mitigation measures: Mitigation Measures M-NO-1a, Transportation Demand Management for Development Projects; M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products; M-AQ-3b, Reduce Operational Emissions; M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-4a, Construction Emissions Minimization; and M-AQ-4b, Construction Emissions Reduction Plan. As such, the Draft EIR identifies this as a significant and unavoidable cumulative air quality impact. Additionally, Impact C-AQ-2 finds that the development under the Plan under cumulative 2040 conditions (based on the results of the above-described SF-CHAMP modeling) would result in significant and unavoidable impacts related to exposure of sensitive receptors to substantial levels of fine particulate matter and other toxic air contaminants, even with implementation of the following mitigation measures: Mitigation Measures M-NO-1a, Transportation Demand Management for New Development Projects; M-AQ-4b,

[105] BAAQMD, CEQA Air Quality Guidelines, May 2017, p. 2-1.

[106] See Section E, Draft EIR Revisions, p. RTC-59 for a discussion regarding the Plan's consistency with the 2017 Clean Air Plan.

Construction Emissions Minimization Plan; M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-5b, Siting of Uses that Emit Particulate Matter ($PM_{2.5}$), Diesel Particulate Matter, or Other Toxic Air Contaminants; M-AQ-5c, Update Air Pollution Exposure Zone for San Francisco Health Code Article 38; M-AQ-5d, Land Use Buffers around Active Loading Docks; M-AQ-5e, Central SoMa Air Quality Improvement Strategy; and M-AQ-6b, Implement Clean Construction Requirements. The cumulative assessment of fine particulate matter and toxic air contaminant exposure from Plan-generated traffic was conducted using the traffic volumes developed from the SF-CHAMP model prepared for Central SoMa, which is further discussed above.

Therefore, as discussed above, comments stating that the Draft EIR does not identify significant and unavoidable cumulative impacts on air quality based on implementation of the Plan are not accurate. As such, revisions to the Draft EIR to address these comments are not required.

Comment CU-4: Transbay Joint Powers Authority Bus Facility

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

O-One Vassar.10

"**Page:** **Comment:**
"N/A The DEIR should reflect any anticipated transportation, circulation, air quality, shadow, or construction-related impacts of the TJPA's current proposal to locate a bus storage facility on Lot 112 of Block 3763, adjacent to the One Vassar Project site." *(Melinda A. Sarjapur, Reuben, Junius & Rose, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.10])*

Response CU-4

The comment states that the Draft EIR should address impacts related to the Transbay Joint Powers Authority's (TJPA's) proposed bus storage facility, which would be constructed within the Plan Area on an existing parking lot. This project, which is currently under construction, includes erection of an approximately 1,500-square-foot mobile modular administration building, an approximately 900-square-foot support building, and a small guard booth, along with paving and grading, and utilities.[107] The bus storage facility is part of the Transbay Transit Center program and was analyzed in the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project EIR, certified in March 2004. The project is not a development project that would generate a residential or net new employee population in the area, and would place a transportation use on a site with an existing transportation use. Although a 900-square-foot support building and a small guard booth would be constructed on the site, this is not considered an expansion of the existing use.[108] Buses would be stored on the site from 7 a.m. to 6 p.m., and buses accessing the site would circulate only on dedicated bus ramps and within the storage facility, so there would be no traffic impacts on adjacent streets. Buses would idle for no more than a few minutes

[107] Transbay Joint Powers Authority, Transbay Transit Center, Current Contract Opportunities, Bus Storage Facility, http://www.transbaycenter.org/rfp/busstoragefacility, accessed June 1, 2017.
[108] City and County of San Francisco, *Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Final EIS/EIR*, March 2004, http://transbaycenter.org/uploads/2009/11/FEIS_Vol_II.pdf, p. 73, accessed July 22, 2017.

a day, and noise walls proposed for the facility would serve to reduce any noise and air quality impacts, as discussed in the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project EIR.[109] Given that the project is located under the I-80 freeway and that the 900-square-foot support building and small guard booth would not exceed 40 feet in height, the project could not result in any shadow impacts and, therefore, could not considerably contribute to a cumulative shadow impact. Furthermore, this project is on schedule to be complete and operational by spring 2018. As such, the project could not combine with projects proposed in the Plan Area to result in a considerable contribution to a cumulative construction impact because it would be completed before any development of projects proposed under the Plan would begin. Therefore, the project is not included in the cumulative analysis, and no changes to the Draft EIR are required.

[109] City and County of San Francisco, *Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Final EIS/EIR*, March 2004, http://transbaycenter.org/uploads/2009/11/FEIS_Vol_II.pdf, pp. 74–77, accessed July 22, 2017.

D.16 Initial Study Topics

The comments and corresponding responses in this section cover topics in the Initial Study (Draft EIR Appendix B). These topics are related to:

Population and Housing [PH]
Recreation [RE]
Public Services [PS]
Biological Resources [BI]
Geology and Soils [GE]

Population and Housing

The comments and corresponding responses in this section cover topics in Initial Study Topic E.3, Population and Housing (Draft EIR Appendix B). These include topics related to:

- Comment PH-1: Residential Location of Plan Area Employees and Occupancy Rates
- Comment PH-2: The Draft EIR Should Map Housing for Seniors
- Comment PH-3: Population Analysis and Conclusion on Housing

Comment PH-1: Residential Location of Plan Area Employees and Occupancy Rates

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

A-CPC-Richards.3
A-CPC-Richards.8
I-Schuttish.1

"Somebody pointed out vacancies. And that's a really good point. So of the 7,000 dwelling units that we have, or whatever the number's going to end up to be, how many people are going to live in them? We have this topic coming over and over. This is on our action item list. And I talked to President Hillis yesterday about it, and we wanted to tease it more, really understand when we say dwelling units, do people actually live there or is it parking money from Moscow or some other place in San Francisco to take advantage of hiding it but also price appreciation." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.3])*

"If there's a way we can understand in other parts of the city where we added jobs and the amount of housing, but where the people actually live, because I know we had the Greener Report, we had all these different facts come together in my head -- 30 percent of the people don't live in the city, they come in from outside the city, just kind of like a quick accounting, back of envelope, where we expect these residents to live would really be helpful because we know how much housing is being entitled; we can think of how much housing that's going to be built.

"And then we're based on our -- you know, we're based on the way things actually are on the ground, where these people probably live given the city and the region as a whole. I think it's a very helpful discussion." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.8])*

"On page S-55 of the plan it states that the range of number of households projected with the various alternatives is approximately 9,200 households (no project) to 25,500 households (plan implementation). This is by the year 2040.

"On page IV-6, Table IV-1 Summary of Growth Projections, seems to show these same numbers just broken out differently, for households under the both options for the plan, No Project and Central SOMA Plan. There is footnote ('footnote a') in there which assumes an 87% occupancy rate because there are a lot of newly constructed units, but then assumes a jump to 95% occupancy in the Plan Area in the remaining years of the plan.

"These percentage numbers in 'footnote a' are based on the 2010 Census. According to the footnote this was when a lot of these even newer buildings in the Central Soma were not even under construction in part due to the ongoing economic downturn from 2008. In other words, there were some new buildings in 2010, that were not occupied, but 'newly constructed'. But there were probably even more in the years after this time and up until 2012-2014 when the economy pick up again.

"Also with regard to this footnote: Aren't these households counted in the 2010 Census occupying buildings that most likely have long term occupancy which would mean rent control, long term mortgages, subsidized housing? Is it reasonable to assume as this footnote seems to imply that the high rate of occupancy is due to all the newly constructed units?

"Also is the assumption of occupancy rate possibly too high, because those households that are attached to units that are condominiums do not necessarily need to live there in order to purchase the unit, or live there full time (pied-a-terre, airBnB, safe harbor investment, etc).

"My point is that isn't this occupancy rate possibly too high an assumption because they are not really occupied and the high occupancy is a different number, perhaps a lower number based on earlier or pre-2010 housing or units?

"In other words, just because the buildings are built, whether they were specifically the buildings cited in the footnote or buildings that came on the market by the middle of the decade, can the level of occupancy be safely assumed? Or to put it a different way … are a number of these buildings 'Zombie Buildings' because the households are not really in these buildings? Is the only real occupancy of households, pre-existing housing prior to 2010 and even earlier housing stock?

"As a sidebar, how do these occupancy rates from 2010 compare to the occupancy rates for households in the eastern SOMA?

"And even if the occupancy rates are accurate, regardless of the points above, there is another question relating to occupancy of households. That for various reasons, some of which are above, will these projected households find their supply of proposed housing within the Central SOMA Plan Area?"

"My concern is that this big jump in households will instead demand housing in the neighborhoods to immediately to the west and to the south of Central SOMA and seek the supply there.

"If people are working in Central SOMA but seek and occupy housing and create households in these other neighborhoods to the west and south … there are two potential impacts …. further gentrification which apparently cannot be directly dealt with under CEQA, but issues of transportation, air quality, etc. … all of which are important.

"Why would households seek to occupy housing in the other neighborhoods to the west and south and not just the Central SOMA? Because it may be more desirable housing due to type of density of the neighborhoods or because of issues of affordability. Perhaps it will be perceived as more family friendly housing or one member of the household will work in the Central SOMA Area, or in the other parts of the expanded Financial District, including the Eastern SOMA while the other member works down the Peninsula. This may be a realistic decision of these types of households due to either higher income levels or size of the household. Higher income levels can buy whatever they want, wherever they want … including neighborhoods to the west and south that may be currently relatively affordable …. namely: Outer Mission, Excelsior, Portola, Crocker Amazon, Bayview, (and even parts of the Mission, Noe, Glen Park and Bernal Heights).

"I understand that households with enough economic means can occupy housing anywhere and focusing on these particular neighborhoods may be tunnel vision … if these households don't occupy in the Central SOMA Plan Area they can go anywhere they want.

"However as these residential neighborhoods cited above are basically adjacent to the Central SOMA (not separated by Market Street), I think it is reasonable to assume that they would inspire the most demand. Particularly in the context of family friendly housing, relative affordability, amenities, transit and transportation, etc.

"Please clarify the impacts on these particular neighborhoods to the west and south and what the numbers in under the No Project and the Central SOMA plan portend, (as well as the various other alternatives mentioned in the DEIR if possible)." *(Georgia Schuttish, Email, February 13, 2017 [I-Schuttish.1])*

Response PH-1

The comment includes the following:

- A request for clarification regarding the assumptions of occupancy rates presented in the Draft EIR, and whether the occupancy rates assumed in the Draft EIR were too high;
- A request for clarification regarding how the occupancy rates from 2010 compare to occupancy rates for households in the eastern SoMa area; and
- A request for clarification regarding whether households (presumably of workers employed within the Plan Area in jobs generated by the Plan) would also be located within the Plan Area.

The vacancy rates used in the Draft EIR for baseline conditions are based on 2010 U.S. Census data, and future occupancy rates are based on a reasonable assumption that occupancy rates within the Plan Area will continue to increase in pace with upwards economic trends in the Bay Area. Refer to Response GC-2 for a discussion of CEQA baseline data. The 13 percent vacancy rate (87 percent occupancy) under 2010 conditions was abnormally

high and accounted for, in part, by the large number of newly built residential units. The 5 percent future vacancy rate (i.e., 95 percent occupancy) is a standard assumption used in many forecasts and is based on some dwelling units always being vacant to allow for normal turnover in the housing market. For example, the Association of Bay Area Governments and Metropolitan Transportation Commission use the same 5 percent housing unit vacancy rate in the forecast of housing growth that is incorporated into *Plan Bay Area*, the region's Sustainable Communities Strategy and regional transportation plan.[110] It is anticipated that as residential development in the Plan Area—which, until recently, included mostly low-rise buildings—becomes more established at a larger scale, the area will move towards a more-typical lower vacancy rate. However, based on the most-recent available U.S. Census data, the occupancy rate for the three census tracts that comprise most of the Plan Area (along with most of Western SoMa)—tracts 178.01, 178.02, and 180—the vacancy rate remains approximately 13 percent, as was the case in 2010.[111]

The comment requests clarification regarding where employees in jobs that would be generated under the Plan would be expected to live. As noted on Initial Study p. 4, the "City has planned for new housing, resulting in estimated capacity for over 75,000 new housing units, it has been less proactive in planning space for jobs." The Central SoMa Plan seeks to provide space for employment growth due to its central location, transit accessibility, urban amenities, and proximity to San Francisco's workforce. However, the Plan also provides for additional housing potential above what is allowed under existing zoning conditions. As presented on Initial Study p. 85 and discussed in greater detail in Response OC-2, p. RTC-258, the method used for estimating the housing demand within San Francisco from Plan Area employment incorporates the fraction of San Francisco employees who live in the city (55 percent) and the average number of workers per household (1.63) to arrive at a total of 19,900 housing units (approximately 22,000 housing units when calculated with the revised employment forecast presented in the Draft EIR). It is noted that the percentage of San Francisco workers who live in the city remained stable between 1980 and 2010. Based on Census data from 2010, the last year for which this detailed commuter data is available, approximately 45 percent of San Francisco workers commute from outside the city, with the three largest sources of commuters being San Mateo County (13 percent), Alameda County (12 percent), and Contra Costa County (8 percent). In the Plan Area, the share of workers who commute from outside San Francisco is lower, according to the San Francisco County Transportation Authority's citywide travel demand model, which is known as SF-CHAMP. Relying on SF-CHAMP data for the morning commute as a proxy for the journey to work, the data indicate that 31 percent of Plan Area jobs are currently held by out-of-town commuters, while San Francisco residents hold 69 percent of Plan Area jobs, including 5 percent of Plan Area employees who currently live in Central SoMa. With Plan implementation, the percentage of out-of-town commuters is projected by the SF-CHAMP model to increase to 34 percent, the share of Plan Area jobs held by Central SoMa residents is projected to increase to 7 percent, and the remaining 59 percent of Plan Area employees projected to travel from other parts of San Francisco. In other words, the share of Central SoMa residents who work in Central SoMa is projected by SF-CHAMP to increase from 5 percent to 7 percent with Plan implementation. However, the percentage of commuters from outside of San Francisco would also increase, as Plan Area employment growth attracts workers from elsewhere in the Bay Area.

[110] Association of Bay Area Governments and Metropolitan Transportation Commission, "2040 Regional Forecast of Jobs, Population and Housing," *Plan Bay Area 2040 Final Supplemental Report*, July 2017, p. 5, http://2040.planbayarea.org/sites/default/files/2017-07/Regional%20Forecast%20Supplemental%20%20Report_Final_7-2017_0.pdf, accessed August 7, 2017.

[111] U.S. Census, American Community Survey 2015, 5-Year Estimates, Table DP04, Selected Housing Characteristics.

One comment suggests that employees working in the Central SoMa Plan Area could seek housing in other San Francisco neighborhoods, particularly west and south of the Plan Area. The commenter states that some neighborhoods to the west and south, such as "Outer Mission, Excelsior, Portola, Crocker Amazon, Bayview, (and even parts of the Mission, Noe, Glen Park and Bernal Heights)" are relatively affordable and could prove attractive to Central SoMa employees who could choose to live in these neighborhoods. Precisely where in San Francisco those Plan Area employees who choose to live in the city would seek housing is not known, and it would be speculative to try to discern specific locations of new Plan Area employee housing. However, as described in Draft EIR Chapter II, Project Description, the Plan Area's transit accessibility makes the Plan Area a logical center for new employment, given that workers could readily travel by transit to and from jobs in the Plan Area to homes both in the city and elsewhere. Additionally, as stated in Draft EIR Table IV-1, Summary of Growth Projections, p. IV-6, the Plan Area is anticipated to see an increase of 14,500 housing units between 2010 and 2040; hence, a sizable share of new Plan Area employees could be accommodated within the Plan Area, should they so desire. Others would live elsewhere in San Francisco, possibly in some of the 75,000 units noted above, or in other communities.

Of the 75,000 planned-for housing units within San Francisco, the vast majority are within the higher-density neighborhoods on the city's east side where area plans and/or redevelopment plans have been adopted in the last 15 years. These areas include Hunters Point/Candlestick Point and Treasure Island, which together will provide more than 18,000 new housing units, as well as the Eastern Neighborhoods (East SoMa, Mission, Showplace Square/Potrero Hill, and the Central Waterfront include 9,800 units, of which half had been constructed by the end of 2015), Western SoMa (2,700 units), Market and Octavia (6,000 units, of which about 1,600 were built by 2014), Balboa Park (1,800 units), Visitacion Valley and Executive Park (3,300 units), Mission Bay (6,100 units, of which about 800 remain to be built), and Transbay/Transit Center (2,600 units, about 1,000 of which are built), as well as Rincon Hill, where construction on most large sites has already occurred, and Parkmerced in the city's southwest quadrant (5,600 units).[112] In addition, the General Plan Housing Element (adopted 2015) estimates that another approximately 3,000 new housing units could be developed in low- and moderate-density neighborhoods (RH-1, RH-2, and RH-3 use districts), largely on the city's west side.[113] These planned-for housing units are anticipated to accommodate a substantial portion of the housing demand from Central SoMa employees who desire to live in San Francisco and who are not already city residents. The physical effects related to this planned-for residential development have been evaluated in EIRs completed in recent years for various area plans. Additionally, development of these new housing units is included in the assumptions underlying the SF-CHAMP model that, as noted above, provides the basis for the Draft EIR's quantitative analyses of transportation, noise, and air quality.

Concerning the question about the comparison of the Plan Area's 2010 vacancy rate to that of East SoMa, it is noted that approximately half of the East SoMa Plan Area overlaps with Central SoMa (see Draft EIR Figure III-1, Area Plans in and near the Central SoMa Plan Area, p. III-3), so the Central SoMa vacancy rate can reasonably be assumed to be comparable to that of East SoMa as a whole. As the comments request only clarification of the population and housing analysis beginning on Initial Study p. 77, no revisions to the Draft EIR are required.

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[112] San Francisco General Plan Housing Element, Part II, p. 9, http://www.sf-planning.org/ftp/General_Plan/2014HousingElement-AllParts_ADOPTED_web.pdf, accessed June 15, 2017.

[113] San Francisco General Plan Housing Element, Part I, Table I-57, pp. I.68 and I.73

Comment PH-2: The Draft EIR Should Map Housing for Seniors

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

O-VEC.11

"Moreover, South of Market is home to many seniors and people with disabilities. Many senior services are also located in the neighborhood and serve many senior and people with disabilities who may not reside within the area plan. According to *Assessment of the Needs of San Francisco Seniors and Adults with Disabilities*, by *San Francisco Human Services Agency Planning Unit*, while 'the median market rate for one bedroom apartment is $3,880 per month ($46,560 per year), the median household income for a single senior is around $22,000' and 'adults with disabilities living alone report a median annual income closer to $12,000'. The DEIR rarely mentions seniors and people with disabilities when it comes to their housing needs and fails to map potential sites for senior housings that are close to transit systems and services in proximity to the area plan." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [*O-VEC.11*])*

Response PH-2

The comment states that the Draft EIR does not address the housing needs of seniors and people with disabilities, and states that a map identifying potential sites for senior housing within close proximity to transit and other services should be included in the Draft EIR. In general, this is a comment that addresses the merits of the Plan rather than the Draft EIR.

Draft EIR p. IV.D-13 specifically notes that there are a number of senior housing complexes in the Plan Area and recognizes that senior pedestrians and pedestrians with disabilities can have special safety considerations that affect their walking experience. For this reason, the pedestrian analysis evaluates impacts on pedestrians beginning on p. IV.D-56 and addresses impacts on seniors and those with disabilities on p. IV.D-57. The analysis states that sidewalks and crosswalks within the Plan Area do meet the required *California Manual of Uniform Traffic Control Devices* and *Americans with Disabilities Act Accessibility Guidelines* design standards. In addition, implementation of Vision Zero projects, including new traffic signals, leading pedestrian intervals, continental crosswalks, corner sidewalk extensions, turn restrictions, and audible/accessible pedestrian signals, in tandem with the proposed street network changes, would actually reduce hazards for pedestrians within Central SoMa, including for seniors and persons with disabilities; hence, the impact would be less than significant. The Draft EIR also considers residential uses, including senior residences, to be sensitive receptors for purposes of the noise and air quality analyses, as discussed on p. IV.E-9 and p. IV.F-14, respectively. As such, environmental impacts on seniors and persons with disabilities as a result of the Plan are addressed as appropriate under CEQA, and no changes to Draft EIR are required.

Regarding the request to include a map identifying potential sites for senior housing in the Draft EIR, as the analysis considers environmental impacts at the Plan level and not at the individual project level, it would be speculative to anticipate what type of housing would be developed and where in the Plan Area such development would occur. As such, no changes to Draft EIR are required.

Comment PH-3: Population Analysis and Conclusion on Housing

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

O-CSN-1.28
O-CSN-1.47

"**E. The DEIR's Analysis of Population, Employment and Housing Impacts is Inadequate.**

"The DEIR concludes that population, employment and housing impacts of the Plan will be less than significant. (DEIR Appendix B, Initial Study at page 82, DEIR in reliance on the Initial Study at page I-2). As discussed by Urban Planner Terrell Watt, AICP, this conclusion is untenable and not supported by substantial evidence. Watt explains:

> Instead of providing an adequate analysis of these impacts based on the current Project, the DEIR refers to the discussion of Population and Housing in the Initial Study in reaching its conclusion that impacts will be less than significant. There are many reasons this approach is flawed. First, accurate and consistent existing and projected population, housing and job growth are essential facts to support this conclusion. The Project addressed in the Initial Study and the DEIR are different and therefore the Initial Study cannot adequately analyze the Project as currently proposed. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with both direct and indirect population growth in the area will be less than significant is not supported by analysis, facts or evidence as required. The Project (Plan) clearly will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. The Initial Study states that the Project (Plan) allows up to 56,400 new jobs by 2040 and an increase in population of 23,400. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study. DEIR Appendix B, Initial Study at page 85.[18] Despite this substantial increase in jobs, residents and housing, the Initial Study dismisses impacts as less than significant based on the assertion the growth [is] within projected growth for the City as a whole and that the Plan itself 'would not result in direct physical changes to population or housing.' DEIR Appendix B, Initial Study at page 80. This is simply wrong. The Project (Plan) by allowing substantial development in the area including development projects proposed in reliance on the Plan and 'that would be allowed under the Plan' will result in changes to the physical environment; changes that must be analyzed in the DEIR. (DEIR at page IV-8 to IV-10). The argument that the Project will result in less than significant impacts because growth is within regional and/or City-wide growth projections is contrary to CEQA's requirement to analyze the significant impacts of a Project against existing conditions (setting) and for the project area. By any measure, the increase in growth as a result of the adoption of the Project is substantial and the numerous impacts associated with substantial new growth of jobs and housing significant as well.
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> ***
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> The additional … 25,000 new residents and 63,000 jobs will certainly increase need for a full range of services including schools, day care, police, fire, medical and more. This increased demand would also further induce businesses to expand and new businesses would crop up to serve the larger population. This would require new employees and draw new residents to the area, who in addition to the direct employment generated by the Project, would also need housing. Neither DEIR nor Initial Study analyze these impacts. In addition, the Project includes Plan objectives implemented through zone changes to

favor non-residential development over other kinds of growth and favoring office space and hotels. DEIR at II-13. The result of favoring non-residential over residential development is likely to be an even greater than disclosed jobs housing imbalance. The direct and indirect impacts of this growth must be disclosed and analyzed in a revised and recirculated DEIR."

Footnote:

[18] It is noteworthy these growth assumptions are vastly different than presented in the Central SOMA Plan, DEIR, Financial Analysis and policy papers. See discussion of Growth Inducement in this [comment] letter for examples of the vastly different descriptions of growth under the Project.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.28])

"2. The DEIR's Analysis of and Mitigation for the Project's Population, Employment and Housing Impacts is Inadequate

"The DEIR's approach to analysis of population and housing does not adequately analyze Project-related impacts associated with changes that would occur with Project (Plan) implementation to the population, including employment and residential growth. Instead of actually analyzing the Project's impacts related to population and housing, the DEIR, in reliance on the Initial Study, asserts that all impacts both direct and indirect will be less than significant. Neither the DEIR or the Initial Study contain facts or evidence to support this conclusion. The result is a lack of information about the actual severity and extent of impacts associated with significant growth in population, jobs and housing. For a Project (Plan) that will guide development of the Area for 25 years (until 2040) and likely be the basis of streamlined permitting for development projects (see e.g., DEIR at page 1-7), it is especially important that the DEIR comprehensively identify and analyze its impacts on growth, population, housing and employment.

"In reaching the conclusion that impacts related to population and housing are less than significant, the DEIR points to the following documents: Initial Study (DEIR Appendix B at pages 77 to 88); DEIR Chapter II, Project Description; and Section IV.A Land Use and Land Use Planning. DEIR at page I-3. The Initial Study notes that the population growth accommodated in the Plan could result in physical changes related to transportation, air quality, noise and public services and utilities, as well as other environmental resource areas and suggests these impacts are addressed in the respective environmental topic sections, but finds impacts to be less than significant.

"In determining impact significance associated with growth in population, employment and housing, CEQA requires analysis of the following topics (see Appendix B, Initial Study at page 77):

- Would the project induce substantial population growth in the area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?
- Would the project displace substantial number of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?
- Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

"In addition to these questions, the DEIR must also answer the question would the project result in a greater imbalance between jobs and housing, including jobs housing fit,[14] to address potentially significant impacts

associated with increased vehicle miles traveled (greenhouse gas, air quality, traffic, etc.), as well as to analyze the potential for the Project to generate increased demand for housing, services and infrastructure.

"The DEIR's analysis of these potential impacts associated with population, employment and housing is inadequate for all of the following reasons.

"First, as described above, there is no consistent, stable and finite Project description as to the growth allowed by the Project. For this topic, the DEIR relies on the Initial Study for analysis. Here, as noted above, the Initial Study is based on a different Project in terms of Project Area boundary, allowed growth and other project details. Discussions in the Initial Study are based on out date, inconsistent and incomplete setting (environmental baseline) information including but not limited to information about the number of existing housing units and affordable housing units, the number and type of jobs in the Project area, as well as other information necessary for an adequate analysis of impacts associated with population and housing. For these reasons alone, a revised DEIR must evaluate the impacts of the Project with respect to population and housing and identify mitigation for impacts as they are likely significant.

"Second, the DEIR errs in relying on the Initial Study's discussion of impacts related to population and housing as the required analysis of these impacts. The Initial Study fails to adequately consider the direct and indirect environmental impacts from the Project's increased housing and job creation. The Initial Study's discussion of impacts related to population and housing is incomplete and conclusory in specific respects as described by impact topic below.

- Would the project induce substantial population growth in the area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?

"The DEIR concludes that development under the Project would not induce substantial population growth, either directly or indirectly and therefore this impact is Less than Significant. DEIR Appendix B, Initial Study at page 82, DEIR in reliance on the Initial Study at page I-2.

"The basis for this conclusion is that although development under the Project (Plan) would result in greater development density within the Plan area compared to existing zoning, the development projects that could be proposed and approved pursuant to the proposed zoning controls would accommodate population and job growth already identified for San Francisco, and projected to occur within City boundaries, and thus would not induce substantial population growth, either directly or indirectly. DEIR Appendix B, Initial Study at page 82. According to the Initial Study:

> 'Regardless of the scenario and associated population projections, none of the Plan options or variants would stimulate new population or job growth within San Francisco that is not already projected to occur by regional growth forecasts and regional air quality planning efforts. For San Francisco, this includes a projected increase of approximately 101,000 households and 191,000 jobs during the period from 2010 to 2040 (see Growth Anticipated in Local and Regional Plans, above). The Plan policies would not trigger the need for roadway expansions or result in the extension of infrastructure into previously unserved areas. Rather by allowing for more density within the Plan area, and accommodating growth that is projected to occur within San Francisco, development under the plan would have the effect of alleviating development pressure elsewhere in the City and promoting density in the already urbanized and transit-rich Plan area. Therefore, the Plan would not induce substantial population growth beyond

that anticipated by regional forecasts, either directly or indirectly, and this impact would be less than significant.' DEIR Appendix B, Initial Study at page 84.

"Instead of providing an adequate analysis of these impacts based on the current Project, the DEIR refers to the discussion of population and housing in the Initial Study in reaching its conclusion that impacts will be less than significant. There are many reasons this approach is flawed. First, accurate and consistent existing and projected population and housing and job growth are essential facts to support this conclusion. The Project addressed in the Initial Study and the DEIR are different and therefore the Initial Study cannot adequately analyze the Project as currently proposed. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with both direct and indirect population growth in the area will be less than significant is not supported by analysis, facts or evidence as required. The Project (Plan) clearly will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. The Initial Study states that the Project (Plan) allows up to 56,400 new jobs by 2040 and an increase in population of 23,400. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study. DEIR Appendix B, Initial Study at page 85.[15] Despite this substantial increase in jobs, residents and housing, the Initial Study dismisses impacts as less than significant based on the assertion the growth [is] within projected growth for the City as a whole and that the Plan itself 'would not result in direct physical changes to population or housing.' DEIR Appendix B, Initial Study at page 80. This is simply wrong. The Project (Plan) by allowing substantial development in the area including development projects proposed in reliance on the Plan and 'that would be allowed under the Plan' will result in changes to the Project Area's physical environment; changes that must be analyzed in the DEIR and were not analyzed in City-wide or regional plans or related environmental documents. (DEIR at page IV-8 to IV-10). The argument that the Project will result in less than significant impacts because growth is within regional and/or City-wide growth projections is contrary to CEQA's requirement to analyze the significant impacts of a Project against existing conditions (setting) and for the project area. By any measure, the increase in growth as a result of the adoption of the Project is substantial and the numerous impacts associated with substantial new growth of jobs and housing significant as well.

"A revised analysis must be completed and recirculated with the following elements:

- A complete, stable and consistent description of the Project in terms of growth allowed and broken out by potential new housing units, housing affordability, potential new households, population and employment (employment by general category of job and employees by general salary range), among other information necessary to undertake the analysis. To resolve the inconsistencies and confusion between the Initial Study and DEIR, a revised NOP/IS should be recirculated in advance of a new Draft EIR.
- Complete, consistent and up to date baseline (setting information) including but not limited to existing population and demographical information, housing, housing affordability, deed restricted units, type of units (e.g., senior, family, other) households, population and employment (by general category of jobs; e.g., service, tech, and general salary ranges).[16]
- Analysis of the impacts associated with growth of housing, population and employment within the Project Area in terms of both direct (new homes or businesses) and indirect impacts (demand for infrastructure or services). The California Courts have established a framework for considering population-related impacts. When analyzing these impacts, [an] EIR should identify the number and type of housing units that persons working in the project area can be anticipated to require, and identify the probable location of those units. The EIR also should consider whether the Project includes sufficient

> services and public facilities to accommodate the anticipated increase in population. If it is concluded that the Project area lack sufficient units and/or services, the EIR should identify that fact and explain that action will need to be taken and what that action entails so that indirect impacts can be disclosed and analyzed. Once the EIR determines the action needed to provide sufficient housing, services and public facilities, CEQA then requires an examination of the environmental consequences of such action.

"A complete analysis of population growth thus requires two distinct and logical steps. First, an EIR must accurately and completely estimate the population growth that a project would cause, both directly and indirectly. Specifically, in this case, the DEIR must estimate the population growth accommodated by the new housing and the number of employees the Project will require as compared with existing baseline conditions, including whether those employees are likely to be new to the area and region and generally what the types of employment and commensurate salary ranges may be.[17] Guidelines Appx. G Section XII(a) directing analysis of whether project would induce substantial population growth. The DEIR also must consider the growth that a project would indirectly cause, whether through stimulating the local economy so that new employment opportunities draw new population or by providing infrastructure that allows new residential construction. Guidelines section 15126.2(d) ('Discuss the ways in which the proposed project could foster economic or population growth. . . . ').

"Step two in analyzing the impacts of population growth is to consider the environmental impacts of serving that estimated new direct and indirect population. Thus, the EIR must not only evaluate whether a project would induce substantial growth, but also whether such growth would require construction of new housing, infrastructure or services, including roadway improvements for emergency vehicle passage,[18] child care and schools. Guidelines Appx. G Section XII(a). (c). If new construction will occur, then the EIR must analyze the environmental impacts of that construction. The EIR must also consider whether the new population would place demands on public services, including schools and roads. Guidelines Appx. G Section XIII(a). The EIR than must consider the environmental impacts of providing such facilities if they are necessary.

"Here the Initial Study relied on by the DEIR for the analysis failed to consistently and accurately estimate and analyze direct and indirect population growth caused by the Project. The DEIR does not disclose that the Project would also indirectly induce additional people to move to the area, which could result in additional potentially significant environmental impacts. In fact, as described in detail above, the Project description fails to provide consistent and complete information about the Project's population, employment and housing. Nonetheless, the Initial Study and DEIR conclude that Project impacts associated with population and housing will be less than significant.

"This is too simplistic a conclusion, as no single factor determines whether a project will indirectly trigger population growth. For example, in this case, the population increase would almost certainly require new and expanded services and would inject new money into the local economy inducing additional growth and development. A larger population in this neighborhood, would surely increase demand on schools and generate increased demand for restaurants, grocery stores, medical care and the like that do not currently exist to serve the planned growth. The additional … 25,000 new residents and over 63,000 jobs will certainly increase need for a full range of services including schools, day care, police, fire, medical and more. This increased demand would also further induce businesses to expand and new businesses would crop up to serve the larger population and businesses. This would require new employees and draw new residents to the area, who in addition to the direct employment generated by the Project, would also need housing. Neither DEIR nor Initial Study analyze these

impacts. In addition, the Project includes Plan objectives implemented through zone changes to favor non-residential development over other kinds of growth and favoring office space and hotels[19]. DEIR at II-13. The result of favoring non-residential over residential development is likely to be an even greater than disclosed jobs-housing imbalance and jobs-housing fit. The direct and indirect impacts of this growth must be disclosed and analyzed in a revised and recirculated DEIR.

"The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. Examples of the kinds of mitigation that should be considered include, but are not limited to, the following [emphasis in original]:

- In combination with strict policies prohibiting displacement of senior, deed restricted and affordable housing, and lowering the total allowable amount of new non-residential uses (e.g., cap on non-residential uses), addition of policies and programs requiring affordable housing to be built concurrent with or prior to new non-residential development in the Project Area (examples include provisions in the Treasure Island and Shipyard projects, among other local and regional policy and regulatory examples).
- Approval and implementation of the Project Area street network plan to serve the Project and review and approval by SFFD and SFPD prior to new development allowed under the Plan proceeding. This should be completed and included in a revised DEIR.
- SFFD and SFPD service reviews and plans to accommodate the proposed growth completed and approved prior to new non-residential development allowed by the Plan occurring.
- Policy, program and regulation(s) in place for a required housing mix in all new residential projects to provide family housing prior to new development allowed by the Plan. The policy and program should be completed and included in a revised DEIR.
- Up to three new sites identified and acquired for new parks prior to new development and fees assured for development of those parks. At least one new park under construction concurrent with or prior to new development allowed under the Plan.
- Reduction of the amount of new employment under the Plan through among other revisions, adoption of the reduced height alternative and prohibition of high rises except where immediately adjacent to transit hubs. A cap should also be placed on total new employment until plan expiration in 2040.

"These and other feasible mitigation measures must be identified in a revised DEIR to address the significant population, employment and housing impacts of the Project and cumulative development on the Project area. A revised Financial Analysis should accompany the revised Plan and DEIR setting forth costs associated with housing, services and other community benefits of the Project and laying out a revised approach to funding implementation of these Project elements.

- Would the project create demand for additional housing, necessitating the construction of housing?

"The DEIR concludes that development under the Project (Plan) would not generate housing demand beyond projected housing forecasts. DEIR Appendix B, Initial Study at page 84. In reaching this conclusion, the DEIR

changes the question to include 'beyond projected housing forecasts' and therefore fails to respond to the key question – would the project create demand for additional housing – thereby avoiding the required analysis.

"The basis for the Initial Study's (and DEIR's) conclusion that demand for new housing is less than significant is twofold: First the plan would not result in physical effects directly and second, the plan merely accommodates planned growth. According to the Initial Study:

> 'As a regulatory program, the Plan would not result in direct physical effects but rather would result in new planning policies and controls to accommodate additional jobs and housing.' DEIR Appendix B, Initial Study at page 84. 'The goal of the Plan is to accommodate regional growth projections for San Francisco…and to shape and direct that growth toward appropriate locations. Because San Francisco is a regional job center, and because the Plan area is near regional transit lines, the Plan area represents one of the locations appropriate for new office development. As described below, the potential housing demand generated by expected office development would be offset by new housing development forecast both within the Plan area and for the City as a whole, as well as through the City's affordable housing programs.' DEIR Appendix B, Initial Study at pages 84-85.
>
> 'Overall, the conservatively estimated housing demand resulting from Plan-generated employment would be accommodated by increases in housing supply, primarily within the Plan area and elsewhere in San Francisco, and the impact would be less-than-significant.' DEIR Appendix B, Initial Study at page 86.

"Instead of providing an adequate analysis of these impacts based on the current Project (Plan), the DEIR simply defers to the discussion of population and housing in the Initial Study.

"There are many reasons the DEIR's approach to the analysis of housing demand generated by the Project (Plan) is flawed. First, accurate and consistent existing and projected population, housing and job growth figures are essential facts to support this conclusion. Yet, the Initial Study and DEIR contain vastly different figures as discussed in this letter. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with employment growth and associated demand for housing in the Project area will be less than significant is not supported by analysis, facts or evidence as required. To the contrary, the Project (Plan) will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. Specifically, the Project (Plan) allows over 56,400[20] new jobs by 2040 and an increase in population of 23,400. Source Initial Study. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study (page 85) and 7,500 housing units according to the DEIR. Thus, there is no question the Project (Plan) will result in much more job growth than housing, exacerbating an already extreme jobs-housing imbalance in both the Project area and the City and Region, causing workers to commute farther and in turn increasing vehicle miles traveled above that described in the DEIR. Increased vehicle miles in turn will result in greater demand for transit, increased traffic congestion, air pollution and greenhouse gas emissions. A revised DEIR must analyze these impacts.

"A revised analysis in a dedicated DEIR section … must be completed and recirculated with the following elements:

- A complete, stable and consistent description of the Project in terms of growth in housing, housing affordability, deed restricted units, households, population and employment (by general category of job), among other information necessary to undertake the analysis. To resolve the inconsistencies and confusion between the Initial Study and DEIR, a revised NOP/IS should be recirculated in advance of a new Draft EIR.

- Complete, consistent and up to date baseline or setting information including but not limited to existing population and demographical information, housing, housing affordability, deed restricted units, households, population and employment (by general category of jobs; e.g., service, tech, salary ranges, etc.).
- Description of existing job-housing fit and projected jobs-housing fit under the Project (Plan) based on a breakdown of new jobs (employment) in terms of general type and salary ranges and existing and projected housing rents and prices.
- Analysis of the impacts associated with new employment generated demand for housing within the Project area. This analysis must be based on facts and evidence.

"The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. In this case, it is clear the Project will generate significant demand for housing beyond that allowed by the Project in the Plan Area. The revised DEIR must address how much new housing will be needed to accommodate new employees and their families? Where will that housing need be met either in existing housing or new housing? If new housing is needed, which it likely is, where will that new housing be constructed – in the Project Area or beyond? What are the physical environmental impacts associated with construction of the new housing? Will indirect or induced growth from the Project result in a demand for additional housing, beyond that required to house new Project employees? If so, where will that housing be located? And so on. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. See above discussion of feasible mitigation measures that should be considered in a revised DEIR."

Footnotes:

[14] Jobs-Housing fit means the extent to which housing prices or rents are matched to the local job salary ranges. Jobs-Housing balance provides a general sense of how in or out of balance housing to fit the local workforce may be. Jobs-Housing fit provides an essential and more granular sense of whether – even if in balance – local employees are able to reside locally or must commute long distances for housing affordable to them and their families. Without jobs-housing fit information, readily available using Census and other data, it is not possible for the DEIR to adequately analyze many Project-related and cumulative impacts including demand for new housing and vehicle miles traveled, among others.

[15] It is noteworthy these growth assumptions are vastly different than presented in the Central SOMA Plan, DEIR, Financial Analysis and policy papers. See discussion of Growth Inducement in this [comment] letter for examples of the vastly different descriptions of growth under the Project.

[16] All available by census and other readily accessible data sources.

[17] The Central SOMA Plan provides parameters for new development that provide a clear sense of the type of new growth in employment that will result from Plan adoption. That is how the Financial Analysis prepared by Seifel Consulting, Inc., was able to derive detailed prototypical developments for the Plan Area based on the Central SOMA Plan. This same approach needs to be taken to developing a complete Project description.

[18] The DEIR defers the plan for emergency vehicle access to a future design of roadway projects and review by SFFD and SFPD. A Project Area-wide and complete design of roadway projects necessary to serve the development allowed by the Plan must be completed and analyzed in a revised DEIR. Deferring this essential element of the Project until later renders unlikely the City's ability to create the necessary emergency vehicle access to overcome the increased traffic congestion the Project will create.

[19] Hotels notorious for lower paying hospitality jobs; jobs that currently are difficult to fill in San Francisco due to the astronomically high housing costs and lack of sufficient housing. The revised DEIR must analyze the Project-related and cumulative impacts associated with the projected increase in San Francisco of hospitality and service jobs since it is the workforce associated with these lower paying jobs that likely will be traveling the farthest from work and home. There is currently no analysis of this in the DEIR.

[20] The Central SOMA Plan allows even more jobs – 63,600 – rendering the jobs-housing imbalance even greater than described in the Initial Study.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.47])

Response PH-3

The comments allege that the Draft EIR's analysis of population and housing is inadequate because it is based on the growth forecasts presented in the Initial Study, which are different than those in the Draft EIR, and Plan Area growth will result in certain secondary impacts, such as a change in neighborhood character, an increase in jobs-housing imbalance, increased demand for public services, increased housing demand, and effects on transportation, air quality, noise, and utilities. The comments also state that the Initial Study and Draft EIR must, therefore, be recirculated.

Approach to Analysis of Population and Housing

The Draft EIR identifies significant unavoidable physical effects related to land use and land use planning, cultural resources, transportation and circulation, noise, air quality, and wind, and each of these effects is a secondary impact of growth that would be permitted pursuant to the Plan. The Draft EIR also identifies significant growth-related impacts that can be reduced to a less-than-significant level. Therefore, the commenters' assertion that the Draft EIR does not analyze the effects of Plan Area population and housing growth is incorrect.

The comments appear to suggest that the entire analysis of secondary physical impacts that would ensue from growth permitted under the Plan should appear in the discussion of population and housing. This is incorrect. In fact, the analysis of population and housing is limited to the three questions that are asked in Initial Study Section D.3:

- Would the project induce substantial population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?
- Would the project displace substantial number of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?
- Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The Initial Study explains that the Plan would not induce substantial growth but, rather, would accommodate growth that is already anticipated and planned for. As explained in Response OC-1, p. RTC-248, the 75,000 housing units already planned for in San Francisco could accommodate a substantial portion of the housing demand from new employees in Central SoMa who desire to live in San Francisco, and development of these new housing units is included in the assumptions underlying the SF-CHAMP model that provides the basis for the Draft EIR's quantitative analyses of transportation, noise, and air quality.

The Initial Study further explains that development that would be allowed under the proposed Plan would not displace a substantial number of existing housing units or people. As explained in Response OC-1, removal of housing units is strictly regulated and highly discouraged under Planning Code Section 317, which also requires replacement of demolished residential buildings. Therefore, because 14,500 new housing units could be developed under the proposed Plan, implementation of the Plan would actually increase, not reduce, the

number of housing units and the Plan Area population. Displacement that occurs as a result of economic conditions, such as changes in employment patterns or increased housing costs, as opposed to physical displacement through demolition of housing, is not considered a physical environmental impact under CEQA. Nevertheless, such effects are discussed in Response OC-1.

Regarding jobs-housing balance, refer to Response OC-2, p. RTC-258, which explains that, while this measure is useful in a citywide or region-wide context, it is not relevant within the context of a relatively small area, such as the Plan Area.

Concerning the comments stating that the Plan would increase vehicle miles traveled (VMT), please see Response TR-3, which explains that Plan implementation would decrease per capita VMT, as well as job-based average VMT, from existing conditions, and therefore would have a less-than-significant effect with respect to growth in VMT. Additionally, Response AQ-1 explains that the Plan would result in a lesser rate of growth in VMT than in Plan Area population, also resulting in a less-than-significant impact. Response OC-2 also explains that the Plan would not increase VMT as a result of gentrification or displacement within the Plan Area.

Regarding neighborhood character, see Response LU-4.

Difference between the Draft EIR and the Initial Study Growth Projections

Concerning the revisions to the growth projections between the publication of the Initial Study and the Draft EIR, refer to Response PD-6, p. RTC-52, which discusses these changes and explains that the revisions would not result in any new or substantially more-severe impacts under the topics addressed in the Initial Study that involved quantification of impacts (Population and Housing, Recreation, Utilities and Service Systems, and Public Services) than those identified in the Initial Study. Likewise, Response PD-6 explains that the Initial Study remains valid for topics where the analyses do not rely on growth projections but, rather, are a function of policy changes (Greenhouse Gas Emissions and Energy) or of the location of anticipated development (Biological Resources; Geology and Soils; Hydrology and Water Quality, except for combined sewer discharges studied in the Draft EIR; Hazards and Hazardous Materials; Mineral Resources; and Agriculture and Forest Resources). It is also noted that the introduction to Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, p. IV-1, discussed the changes to the project description since publication of the Initial Study.

Mitigation Measures for Population and Housing Impacts

The comments recommend a number of mitigation measures. No mitigation is required because effects related to population and housing would be less than significant; however, it is noted that most of the commenter's recommendations would be implemented by Plan adoption and implementation and/or by existing City ordinances, regulations, and policies. For example, as explained in Response OC-1, p. RTC-248, removal of housing units is strictly regulated and highly discouraged under Planning Code Section 317, which also requires replacement of demolished residential units. Affordable housing is required to be constructed or funded in connection with non-residential development, pursuant to Planning Code Section 413, and with development of market-rate housing, pursuant to Planning Code Section 415; and the Plan (Objective 2.3) calls for 33 percent of new Plan Area housing units to be affordable to very-low-, low-, and moderate-income households. To facilitate meeting this objective, Plan implementation would levy an additional affordable housing fee on new Plan Area development (Central SoMa Plan p. 136). Concerning the mix of dwelling units, in most of the South of Market neighborhood, for new residential projects, the Planning Code currently requires that a minimum of

40 percent of units contain two or more bedrooms, that 30 percent of units contain three or more bedrooms, or that 35 percent of all dwelling units contain two or more bedrooms with at least 10 percent containing three or more bedrooms. The Plan would retain this provision within the Plan Area.

The Draft EIR does identify significant impacts that would occur as a result of the anticipated growth in the Plan Area. These impacts, and associated mitigation measures, are analyzed in the applicable technical topics of the Draft EIR, including Section IV.A, Land Use and Land Use Planning; Section IV.C, Cultural and Paleontological Resources; Section IV.D, Transportation and Circulation; Section IV.E, Noise and Vibration; Section IV.F, Air Quality; and Section IV.G, Wind. Despite mitigation measures identified in the Draft EIR, the Plan would result in significant and unavoidable impacts with respect to each of these environmental topics. In addition, the Initial Study identifies significant impacts related to biological resources and hazards and hazardous materials; these impacts are mitigated to a less-than-significant level through mitigation measures identified in the Initial Study.

Concerning the reference to the Treasure Island and Candlestick Point–Hunters Point Shipyard projects, which the commenter notes as having set forth policies and programs requiring affordable housing to be built concurrent with or prior to new non-residential development, neither of those projects was an area plan and each involved redevelopment of a site by a single master developer. While the commenter states that such policies and programs could be employed as mitigation for the Central SoMa Plan EIR, neither the Treasure Island nor Shipyard EIRs identified mitigation measures because both EIRs found that population and housing impacts were less than significant, as with the Central SoMa Draft EIR. Moreover, both Treasure Island and the Shipyard are redevelopment projects: Treasure Island is administered by a separate Treasure Island Development Authority, while the Shipyard project is under the jurisdiction of the Office of Community Investment and Infrastructure, successor agency to the San Francisco Redevelopment Agency. Because of these governance structures, and because there is a single master developer for each of these projects, the City was able to develop a specific regulatory framework concerning affordable housing and other issues that applies to the entirety of each project. For Treasure Island, a legally binding Development Agreement is in place, while the Shipyard project is subject to a similarly mandatory redevelopment plan and disposition and development agreement. This governance structure is not applicable to the Central SoMa Plan Area, where subsequent development would be undertaken by multiple entities within a framework established by the Plan itself and its implementing legislation (zoning), as described above.

Public Services

Regarding public services and review by the San Francisco Fire Department and the San Francisco Police Department of the proposed street network changes and Plan Area development, both the fire and police departments undertake long-range planning based on Planning Department growth forecasts. As stated on Initial Study p. 121, should the Fire or Police Department determine that new facilities were required in the future, "any potentially adverse effects from new fire facilities would be similar to those anticipated by development under the Plan, such as noise, archeological impacts, air quality impacts such as emissions of dust and other pollutants, including diesel exhaust, and temporary street closures or other traffic obstructions." This conclusion remains valid, notwithstanding the slightly greater growth projections analyzed in the Draft EIR, compared to those in the Initial Study, for the reasons set forth in Response PD-6. The Draft EIR's mitigation measure for potential effects on emergency vehicle access related to the proposed street network changes (Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, p. IV.D-81) is explicitly timed to occur at the design phase of each street network project, which, as is typically the case for both roadway changes and

development projects, occurs after the completion of environmental review and is based on preliminary design information. This measure requires SFMTA, to the degree feasible, design street network projects to include features that create potential opportunities for cars to clear travel lanes for emergency vehicles; examples of which include curbside loading zones, customized signal timing, or other approaches developed through ongoing consultation with the San Francisco Fire Department. Moreover, the Fire Department participates in Plan review of individual development projects to ensure compliance with the fire code.

Open Space

Concerning open space, as stated on Draft EIR p. II-31, the Plan identifies two park sites (the block bounded by Fourth, Fifth, Bryant, and Brannan streets, and Bluxome Street between Fourth and Fifth streets) and calls for identification of a third site. It is noted that current plans indicate that the new park on the block bounded by Fourth, Fifth, Bryant, and Brannan streets would be constructed by the developer of the proposed 598 Brannan Street project, meaning that this park would be under construction concurrent with development allowed under the Plan.

Alternatives to the Proposed Plan

Two comments essentially express support for alternatives to the proposed Plan. The commenter's recommendation of a cap on non-residential development would fundamentally conflict with several of the Plan's basic objectives, including to increase the capacity for jobs and housing; facilitate an economically diversified and lively jobs center; provide safe and convenient transportation that prioritizes walking, bicycling, and transit; and create an environmentally sustainable and resilient neighborhood. Regarding the suggestion for a prohibition on high-rise development except immediately adjacent to transit hubs, as stated in Response AE-2, p. RTC-121, the entire Plan Area meets the City's Proximity to Transit Stations screening criterion for vehicle miles traveled because it is within 0.5 mile of an existing rail stop or bus line with a peak-period headway of 15 minutes or less. Accordingly, tower development anywhere in the Plan Area would be proximate to high-frequency transit service.

Demographic Information

The comments also state that the Draft EIR should include detailed demographic information concerning housing affordability, deed restricted units, type of units (e.g., senior, family, other), and employment by general category of jobs. None of this information is required by CEQA, and no change to the Draft EIR is required.

For the reasons described above, the analysis in the Initial Study and Draft EIR regarding population and housing, as well as the analysis of the physical effects of Plan Area growth, is adequate. Therefore, recirculation of the Initial Study and Draft EIR is not required.

Recreation

The comments and corresponding responses in this section cover topics in Initial Study Topic E.10, Recreation (Draft EIR Appendix B). These include topics related to:

- Comment RE-1: Adequacy of Open Space and Privately Owned Public Open Space (POPOS)

- Comment RE-2: Adequacy of Recreational Facilities

Comment RE-1: Adequacy of Open Space and Privately Owned Public Open Space (POPOS)

This response addresses a comment from the commenters listed below; this comment is quoted in full below this list:

O-CSN-1.29
O-SOMCAN-Cabande.14
O-VEC.1

"**F. The Plan will have Significant Adverse Open Space Impacts that are not Disclosed or Analyzed in the DEIR.**

"The DEIR admits that the Plan area suffers from an extreme lack of open space. South Park is the only Rec and Park property in the Plan area. (DEIR, p. II-31). However, the Plan creates almost no new open space area. Worse, it degrades existing open space areas by casting shadows on existing parks and POPOS throughout the Plan area, in violation of the General Plan. (See discussion above). Therefore the DEIR's conclusion that the Plan has no adverse open space impacts is arbitrary and capricious.

"The DEIR should be revised to propose specific new open space areas. One prime opportunity for a new open space area is the parking lot located at 350 Second Street. The DEIR should consider other potential open space areas and parks, and also new POPOS throughout the area. This would support the Plan's own Objective, 5.2, 'Create new public parks.' (DEIR, p. II-31).

"The DEIR should also require [implementation] of the Reduced Height Alternative as a way to reduce shadow impacts on South Park and other public open spaces in the Plan area." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.29])*

"**11. The Plan Continues to Provide an Inadequate Amount of Open Space in SoMa By Relying on POPOS**

"The SoMa is the most open space deficient neighborhood in San Francisco[16], along with the neighboring Tenderloin. Instead of providing sufficient, green and publicly accessible open space, Planning has been defaulting to providing new open space for SoMa through Privately Owned Public Open Spaces (POPOS)[17]. POPOS have a negative impact on the community for many reasons:

- These spaces aren't truly open to the public, activity is discouraged and hours are limited;
- POPOS are not protected by the Proposition K Shadow Ordinance because they are not open spaces owned by the City's Rec and Park Department;
- Because there's no Prop K protection, it's difficult to establish a standard of shadow protection for these open spaces because CEQA is not specific on this matter;
- These spaces do not represent the type of open space that is public and accessible for use by youth, families, and seniors (like a public park); and
- POPOS overly regulate the types of activities allowed and have restrictive hours that limit access;

"SoMa has such a lack of places for public recreation and truly accessible open spaces that there must be a clear plan for creating new public open spaces that are owned and managed Rec and Park."

Footnotes:
[16] http://default.sfplanning.org/publications_reports/library_of_cartography/OpenSpaceMap.pdf
[17] http://sf-planning.org/privately-owned-public-open-space-and-public-art-popos

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.14])

"We, at the VEC, have watched our neighborhood change slowly during these years and are deeply concerned about the rapid changes and significant impacts proposed by a multitude of projects. The Central SoMa Plan proposed for an area generally bounded by Market Street, Townsend Street, 2nd Street and 6th Street, as outlined in the DEIR, identifies neighborhood strengths, challenges, and possible mitigation tools; however, after review of said DEIR, participation in community meetings hosted by the Planning Commission, and extensive communications with other community based organizations, VEC finds that the DEIR has certain inadequacies requiring further assessment or analysis and has additional questions and concerns regarding the plan area that we hope the Planning Department can address.

"A. Open Space

"VEC recognizes that the only public park within the Plan Area is South Park and so the creation of new public open space is limited, especially in anticipation of the increased number of residents in the Plan Area. Thus, the Plan looks to the inclusion of POPOS to 'ensure that new buildings enhance the character of the neighborhood and the city' (11-17). VEC requests that the Planning Department releases the regulations of Planning Code Sections 135 and 138 in a manner that is easily accessible for local residents and workers to understand. This will provide the opportunity for community members to understand what the current regulations are and engage in further discussion to provide input on additional design guidelines for future POPOS within the Plan Area. For example, some existing community discussions around POPOS have included: more accessible operational standards especially standards of accessibility for people with disabilities; additional amenities such as children's play areas; game tables and seating; open air cafes, kiosks, or food service in adjacent retail spaces[1]. We want to ensure that should future developers opt to create POPOS, that these forms of open space are of high quality, accessible, and help address the lack of recreational open space in the South of Market."

Footnote:
[1] https://www1.nyc.gov/site/planning/plans/oops/pops-plaza-standards.page

(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.1])

Response RE-1

The comments note that SoMa is an open-space-deficient neighborhood and express concern that POPOS have a negative impact on the community. One comment erroneously states that the Plan creates almost no new open space, and requests that the Reduced Height Alternative be adopted to reduce shadow impacts on South Park when no significant shadow impacts were identified. The comments further request that a plan be developed for creating new public open spaces that are owned and managed by the San Francisco Recreation & Parks Department, and that the Planning Department "release the regulations of Planning Code Sections 135 and 138" so that the public may have an opportunity to provide more input on the design of POPOS. While the

commenter asserts that "SoMa is the most open space deficient neighborhood in San Francisco," existing unmet demand for parks and recreational resources within the Plan Area is not considered to be a significant impact on the environment. As described on Initial Study p. 104, based on the CEQA significance criteria, development under the Plan would have an adverse environmental impact if it were to cause the deterioration of existing recreational resources through increased use or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. The comments suggest that the Plan lacks sufficient open space, but they do not address the potential for the physical degradation of existing open spaces or the potential for physical environmental impacts resulting from the need for construction or expansion of recreational facilities resulting from the Plan.

These comments pertain more to the merits of the Plan and the Planning Department's policies and procedures regarding community engagement in the planning process. Nevertheless, the assertion in the comments that the Plan does not provide sufficient open space is addressed in this response. For the city as a whole, as of 2015, 19 percent of the city's total land area was designated as city, county, metro, state, and federal parkland, leading to the city's rank for this metric as the third highest among the highest-density cities in the country, partly attributable to the benefits of the city's many small parks.[114] In addition, of the 100 largest cities nationwide, San Francisco is the first city to have every resident live within a 10-minute walk of a park or open space.[115]

As discussed on Draft EIR pp. II-32 and II-33, the Plan proposes to create new public parks, create new public recreational facilities, utilize the street right-of-way for additional gathering and recreational opportunities, and augment the public open space and recreation network with POPOS. Parks and recreational improvements and opportunities are a central goal of the Plan. The Plan includes proposals to create multiple new public parks, including (1) creating a new public park in the southwest part of the Plan Area on the block bounded by Fourth, Fifth, Bryant, and Brannan streets; (2) creating a new linear park along Bluxome between Fourth and Fifth streets; and (3) pursing the creation of a large new park within or near Central SoMa, including site identification and design, and potentially site acquisition and construction pending costs and funding. These new parks may potentially be owned and managed by the San Francisco Recreation & Parks Department. In addition to the new parks listed above, the Plan calls for the development of new public recreation facilities other than parks, including working with developers of large new projects to locate and create a new public recreation center, and working with Caltrans to develop new public recreational facilities under the I-80 freeway.

Regarding concerns that POPOS only provide limited hours; do not provide open space that is accessible for youth, families, and seniors; and are not protected by Planning Code Section 295, note that while all traditional park uses are not feasible in many POPOS, the Plan uses POPOS as augmentation, not substitution, of open space in the Plan Area. Furthermore, Planning Code Section 295 was adopted through voter approval of Proposition K in November 1994 to protect certain public open spaces from shadowing by new structures. As noted on Draft EIR p. IV.H-10, South Park is the only park subject to Section 295 within the Plan Area, and no significant shadow impacts were identified for this park. As described on Draft EIR pp. IV.H-38 through IV.H-40, the design and configuration of potential new open spaces is not known, nor is any potential future programming of these spaces. Accordingly, evaluation of shadow impacts on future parks, open spaces, and

[114] The Trust for Public Land, *2016 City Park Facts*, April 2016, https://www.tpl.org/sites/default/files/2016%20City%20Park%20Facts_0.pdf.

[115] San Francisco Chronicle, "SF 1st city in nation with a park 10-minute walk from every home," May 16, 2017.

POPOS would be speculative. Furthermore, POPOS typically do not involve active recreation or activities that, unlike in a traditional park, would be those for which users anticipate exposure to full sunlight.

In conclusion, the Plan would provide a substantial amount of open space that would help offset the demand for open space in the Plan Area. The Plan would not result in the physical deterioration of park facilities or environmental effects associated with new park facilities not already proposed in the Plan. The commenters have not provided any evidence that the Plan would result in physical deterioration of recreational resources or the need for construction or expansion of the recreational facilities that could have a significant effect on the environment. No changes to the Draft EIR are required.

The request that the Planning Department provide an opportunity for community members to understand current regulations, such as Planning Code Sections 135 (Usable Open Space for Dwelling Units and Group Housing, R, NC, Mixed Use, C, and M Districts) and 138 (Privately Owned Public Open Space Requirements in C-3 Districts), so that the public may provide input on the design of future POPOS does not address the adequacy or accuracy of the Draft EIR. As such, the comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan, and no revisions to the Draft EIR are required.

Comment RE-2: Adequacy of Recreational Facilities

This response addresses a comment from the commenters listed below; the comment is quoted in full below this list:

O-CSN-1.51
O-YBNC-Elberling-3.3

"5. The DEIR Errs in Concluding Impacts to Open Space and Recreation Will Be Less Than Significant

"The Central SOMA Plan area has very limited public open spaces and facilities. While a robust, ethnically and economically diverse community, Central SOMA faces serious challenges in terms of lack of open space and recreational opportunities. Currently 67% of residents live within ½ miles of a public recreational facility compared to 91% for the City as a whole[27]. South Park is the only large-scale open space in the Plan Area and the only Recreation and Park Department property. While there are open spaces adjacent to the Area including Yerba Buena Gardens, the uneven distribution of open spaces and lack of them leaves the area underserved. The General Plan Recreation and Open Space Element (ROSE), adopted in 2014, identifies portions of the Plan Area as in need of new open space. DEIR at page II-31.

"The DEIR relies on the Initial Study for the required analysis of impacts to open space and recreation. DEIR at page I-2. According to the Initial Study, development under the Plan would have an adverse environmental impact if it were to cause the deterioration of existing recreational resources through increased use or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. DEIR Appendix B, Initial Study at page 104. The Initial Study notes that any existing unmet demand for parks and recreational resources that currently exist in the Plan area is not in and of itself considered to be a significant impact on the environment noting that the Plan area is deficient in these resources. Id.

"Based on the Project's proposed network of new open spaces, including POPOS, and a potential new park,[28] the Initial Study concludes that impacts to open space and recreational resources will be less than significant. This conclusion is unsupported by facts, analysis and evidence. The Initial Study briefly alludes to the City's minimum standards for open space and recreational resources per capita, but nowhere in the Initial Study or DEIR is there a quantitative analysis of the need for new open space and recreational resources based on the substantial growth in employee, resident and tourist populations in the area. Given the current lack of adequate resources, growth not accompanied by adequate new development of parks and recreational resources is clearly a significant impact of the Project. Moreover, the Project's proposed new open spaces is far from sufficient to accommodate the new growth based on the City's own standards. A revised DEIR must analyze the Projects quantitative impacts on parks, open space and recreational resources. Feasible mitigation measures should also be identified including the addition of more than one substantial new park in the Central SOMA area. If such facilities are not identified now at the Area Plan stage, it will be too late to identify potential sites and determine how costs of implementation can be shared by new development. The revised DEIR must also include an adequate analysis of the physical environmental impacts associated with construction of new facilities and cannot defer this analysis to a later project specific environmental analysis."

Footnotes:

[27] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

[28] It is far from clear that the proposed new park will ever be a reality. New development should be conditioned on certainty for all essential services to accommodate growth, not limited to new parks and recreational resources.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.51])

"A competent analysis will confirm that existing public recreation facilities are insufficient for the cumulative needs of current plus future SOMA households, especially indoor facilities. There is now just one no-charge public indoor basketball facility, no public swimming pool, and no other public recreation facilities of other common types. Many do exist in private clubs in SOMA, but these are expensive and so not realistically available to all current and future households. There is also insufficient City funds set aside to build such facilities in the future. As a Mitigation Measures our TODCO Community Plan proposes that space for such new public recreation facilities be required to be included in all new office developments where feasible, and/or as a priority criteria for discretionary allocation of Prop M office allocations, and that the proposed Community Facilities District authorized scope include funding of construction and operation of no-fee public recreation facilities anywhere in South of Market, not just Central SOMA." *(John Elberling, San Franciscans for Reasonable Growth, Letter, February 13, 2017 [O-YBNC-Elberling.3])*

Response RE-2

The comments request a quantitative analysis of various project impacts on parks, open spaces, and recreational facilities, and that mitigation measures be identified to add more than one park in the Plan Area. The comments also express concern that existing public recreational facilities are insufficient for the needs of current plus future households, especially indoor facilities such as basketball courts and swimming pools. The comments further propose mitigation that would require new office developments to provide public recreational facilities and mitigation that would stipulate that the Community Facilities District, a mechanism by which public benefits

are delivered to the community, include funding for no-fee public recreation facilities anywhere South of Market.

The Draft EIR analyzes environmental effects of implementing the Central SoMa Plan. Subsequent development projects in the Plan Area, including new recreational facilities, would undergo project-specific CEQA review to determine whether or not they would result in significant environmental effects not disclosed in the Draft EIR. A quantitative analysis is not an appropriate approach to evaluate recreation impacts because there is no quantitative threshold against which to assess such an impact. The City does not have a per capita standard for parks and open spaces, and the quality and location of open space is as important as the raw acreage.

As noted on Initial Study p. 106 and in Draft EIR Table IV-1, Summary of Growth Projections, p. IV-6, the growth forecasts for the Plan anticipate considerably more employment growth than residential growth; hence, it is likely that much of the new recreational use resulting from development under the Plan would be passive use. As explained on Initial Study p. 106, it is reasonable to assume that "employees would normally frequent open spaces during the midday period, when many office workers spend the lunch hour in publicly accessible open spaces, during other midday breaks, and after work, particularly in the case of workers who are also City residents." However, employees are less likely than residents to make "active" use of parks and open spaces, using playgrounds, ball fields, and like facilities. However, as noted above under Response RE-1, p. RTC-326, and on Draft EIR p. II-31, the Plan calls for the creation of three new public parks (not just one)—a new public park in the southwest part of the Plan Area on the block bounded by Fourth, Fifth, Bryant and Brannan streets; a new linear park along Bluxome between Fourth and Fifth streets; and a third, large, new park within or near Central SoMa, including site identification and design, and potentially site acquisition and construction pending costs and funding. In addition, the Plan also calls for the development of new public recreational facilities other than parks, including working with developers of large new projects to locate and create a new public recreation center, and working with Caltrans to develop new public recreational facilities under the I-80 freeway.

As the Plan itself would not cause further deterioration of existing recreational resources and would develop new public recreational facilities, the impact of the Plan on recreational facilities would be less than significant, and no mitigation is required. The comment requesting that mitigation measures be identified to add more than one park in the Plan Area is unfounded, as the Plan calls for the creation of three new public parks. The comment requesting mitigation measures that would require new office developments to provide public recreational facilities, as well as funding for no-fee public recreational facilities anywhere South of Market, is noted and will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Finally, as noted in Response PM-1, p. RTC-356, in 2013, the Department of Public Health performed a Sustainable Communities Health Assessment analysis of the 2013 draft Plan using the City's Healthy Development Measurement Tool and found that, among other things, implementation of the Plan would be expected to "substantially increase the amount of publicly accessible open space in the Plan Area." The three major open spaces proposed under the current Plan are identical to those in the 2013 draft Plan.

The commenters have not provided any evidence or information that the Plan would result in the deterioration of existing recreational resources through increased use or would require the construction or expansion of recreational facilities that may have an adverse effect on the environment. As such, no changes to the Draft EIR are required.

Public Services

The comments and corresponding responses in this section cover topics in Initial Study Topic E.12, Public Services (Draft EIR Appendix B). These include topics related to:

- Comment PS-1: Childcare
- Comment PS-2: Public Services Analysis Is Inadequate

Comment PS-1: Childcare

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

A-CPC-Johnson.1
A-CPC-Melgar.2
A-CPC-Moore.2
A-CPC-Richards.5
O-SFRG-2.3
O-YBNC-Elberling-3.2

"Just on childcare and related facilities, … it's not just about the potential rezoning on the planning. There would be probably a number of Planning Code and Administrative Code changes that would be needed to really get what we need.

"So, for example, with childcare, it's not just about requiring that buildings require childcare. We actually need state and local law changes to make it legal to provide those spaces because, as of right now, the way we're set up, buildings actually cannot build those spaces even if you require them to do so." *(Christine Johnson, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Johnson.1])*

"And also, you know, the issue of childcare and services, I think that, if we don't plan for it, the market will provide. And those services are services that are more expensive than what people can afford who are currently living there." *(Myrna Melgar, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Melgar.2])*

"The comment that I would like to emphasize is that the public services discussion has an overlay on the family-friendly discussion initiated by Supervisor Yee." *(Kathrin Moore, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Moore.2])*

"Childcare didn't even register with me until John Elberling got up and we talked about it here last week. And that's a really good point." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.5])*

"The Department has no plan. The Department EIR doesn't even have an [childcare] analysis to figure out how much we need -- how many spaces, how many square feet. This is clearly not legally adequate. You must add public services section, a comprehensive one, to the EIR." *(John Elberling, San Franciscans for Reasonable Growth, Hearing Transcript, January 26, 2017 [O-SFRG-2.3])*

"Any competent analysis will confirm that new SOMA resident households and workers will add demand for hundreds if not thousands of new childcare slots, and that in fact the existing supply of childcare facilities is already known to be insufficient for the current SOMA population. As a Mitigation Measure our TODCO Community Plan proposes that space for new childcare facilities with required outdoor area be required to be included in all new office developments on sites bigger than one acre." *(John Elberling, The Yerba Buena Neighborhood Consortium, Letter, February 13, 2017 [O-YBNC-Elberling.2])*

Response PS-1

The comments address concerns related to childcare and related facilities, stating that the Draft EIR does not adequately address impacts related to childcare.

Childcare facilities are not, for the most part, publicly provided services, except to the extent that childcare facilities exist in public buildings. For example, as stated on Draft EIR p. IV.E-9, there is a childcare center (pre-school child development center) at 790 Folsom Street within Yerba Buena Gardens just outside the Plan Area, and there is also a childcare center (pre-school) in the nearby Federal Building at Seventh and Mission streets (these childcare facilities are both operated by non-governmental entities). As noted by several of the commenters, population and employment growth in the Plan Area would generate increased demand for childcare services. However, demand for childcare service is not an impact on the physical environment under CEQA. As such, the Draft EIR does not, as the commenters observe, identify environmental impacts related to demand for childcare. However, increased demand for childcare services could potentially lead to secondary effects on the physical environment through the construction of new childcare facilities.

Most childcare facilities in greater downtown San Francisco are within buildings whose principal use is devoted to other uses—frequently, office buildings. Therefore, provision of childcare in and of itself does not result in adverse physical effects because it generally occupies a relatively small amount of floor area in an existing (or new) building that is constructed primarily for other purposes. The Draft EIR analyzes the effects of construction and operation of new office buildings and other buildings anticipated to be developed pursuant to the Plan, some of which would be expected to provide space for childcare facilities. Accordingly, no changes to the Draft EIR are required.

For information, it is also noted that Planning Code Section 414 requires that new office and hotel projects of 25,000 square feet or greater provide onsite or nearby childcare facilities (potentially in cooperation with other project[s]) or pay an in-lieu fee to the City's Child Care Capital Fund, which is used to increase and/or improve the supply of childcare facilities affordable to low- and moderate-income households. Likewise, Section 414A imposes a residential childcare impact fee, payable to the Child Care Capital Fund, on all new residential projects, with an option for the provision of onsite small family daycare.

Comment PS-2: Public Services Analysis Is Inadequate

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

O-CSN-1.33
O-CSN-1.49
O-SFRG-2.1
O-YBNC-Elberling-3.1

"**J. The Plan will have Significant Adverse Public Service Impacts that are not Disclosed or Analyzed in the DEIR.**

"The DEIR concludes that the Plan will not have significant public service impacts on police, fire protection, and other public services. (DEIR, p. S-46). The DEIR states:

> Development under the Plan and proposed street network changes would not increase the demand for police service or fire protection service such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. (DEIR, p. S-46).

"The DEIR relies on the Initial Study for this conclusion. However, as discussed above, the project described in the Initial Study was entirely different from the Plan. It therefore provides no basis for the DEIR's conclusion.

"This conclusion defies reason and is arbitrary and capricious. The Plan will triple the resident population [of] the area, and more than double the number of workers – adding 25,000 permanent residents and 63,000 workers. This is essentially like adding a population the size of a medium suburb to the City. It is preposterous to conclude that these 90,000 new workers and residents will not require any police, fire or other social services.

"Urban Planner Terrell Watt explains, that the Plan will have highly significant public service impacts. The Initial Study acknowledges that specific development projects allowed under the Plan and associated increases in population and land use intensity would result in an increased demand for public services noting that the Southern Station (in 2013) receives approximately 25% of the City's call for service. (Initial Study at page 120). The Central SOMA Neighborhood (Project area) faces 'amongst the highest violent and property crime rates in the City.'[23] There is no question the addition of over 63,000 new jobs and 23,400 residents will result in significant demand for additional police and fire personnel and likely facilities and equipment. In addition, increased congestion on the Project area roads will likely result in reduced response times unless additional resources are provided in the area (e.g., sub-stations, other). A revised analysis of these impacts must be prepared and recirculated in a new DEIR."

Footnote:
[23] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.33])

"3. The DEIR's Analysis of and Mitigation for Public Services Impacts is Inadequate

"Instead of actually analyzing the Project's impacts on public services, in reliance on the Initial Study, the DEIR concludes that the Project (Plan) impacts to public services including police, fire and schools will be less than significant. DEIR Appendix B, Initial Study at pages 118 to 124, DEIR at page I-2. As stated above, the DEIR errs in relying on the Initial Study for the analysis of public service impacts since the Project described in the Initial Study is materially different than that described in the DEIR. Nonetheless, neither the Initial Study or the DEIR contain facts or analysis to support the conclusion that across the board, impacts to public services will be less than significant. The result is a lack of information about the severity and extent of the Project's impacts on public services including police, fire, emergency services, child care and health services, among others.

"The Initial Study acknowledges that specific development projects allowed under the Plan and associated increases in population and land use intensity would result in an increased demand for public services noting that the Southern Station (in 2013) receives approximately 25 % of the City's call for service. Initial Study at page 120. This level of calls for service has likely gone up since 2013 due to growth in and around the Project area.

"The Initial Study's conclusion that impacts to police, fire and emergency services [are less than significant] is circular, incomplete and unsupported by analysis and facts. Without any analysis of the need for additional fire, police or emergency services, the Initial Study concludes:

> "…development under the Plan would not result in the need for new or physically altered police protection facilities, and this impact would be less than significant. The potential significant effects of any new or physically altered fire facilities are analyzed in other sections of this Initial Study or will be further analyzed and included in the EIR." DEIR Appendix B, Initial Study at page 121.

"The Initial Study notes that the SFFD conducts ongoing assessments of its service capacity and response times and would continue to do so in response to projected growth over the lifetime of the Plan; as another excuse for excluding meaningful analysis. The limited discussion in the Initial Study also ignores the likely significant impacts to these services associated with increased traffic congestion noting that facilities are in the district and presumably unaffected by traffic gridlock.

"This approach falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance. A revised analysis in a new DEIR section must be completed and recirculated with the following elements:

- Setting (baseline) information including up to date calls and response times for police, fire and emergency services as well as the SFFD and SFPD's standards for personal per capita, equipment and facilities. This description should include a current assessment of the capacity of these services and assessment of unmet demands for services, facilities and funding.
- Accurate project description information including but not limited to the growth in population by residents and employment allowed by the Project and a breakdown of the types of development projected as service needs vary by development type.
- A clear articulation of the City's adopted standards for all public services impacted by the Project (e.g., acceptable response times, personnel per population, etc.).
- Based on projections for new development under the Project, projected increases in calls, types of call based on proposed development and associated need for additional personnel and facilities based on adopted and recognized standards.

"The Central SOMA Neighborhood (Project area) faces 'amongst the highest violent and property crime rates in the City'[24] – characterize the crime. There is no question the addition of over 63,000 new jobs and 23,400 residents will result in significant demand for additional police and fire personnel and likely facilities and equipment. In addition, increased congestion on the Project area roads will likely result in reduced response times unless additional resources are provided in the area (e.g., sub-stations, additional personnel, equipment and equipment storage, emergency lanes and pull outs, etc.).[25] A revised analysis of these impacts must be prepared and recirculated in a new DEIR and feasibility mitigation measures identified."

Footnotes:

[24] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

[25] The DEIR's discussion of Cumulative Emergency Vehicle Access Impacts is instructive. DEIR at page IV.D-108. The discussion acknowledges the traffic congestion in the Project Area and that the Project and cumulative development will make it worse: "Development under the Plan and the proposed street network changes would contribute considerably to these significant impacts on emergency vehicle access." DEIR at IV.D-108. The DEIR errs in concluding an Emergency Vehicle Access Consultation would mitigate these impacts. The consultation is deferred to the future and requires review of each street network project to be sure that private vehicles would not be precluded from yielding right of way to emergency vehicles. That plan must be completed now, reviewed and approved as part of a revised DEIR and not deferred until there is no longer flexibility to improve the road system to allow for emergency vehicle access and movement as needed. Such improvements may require additional physical space, pull-outs and other modifications to address an already dire situation due to existing congestion, the DEIR admits will be made worse by the Project plus cumulative projects.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.49])

"When the Central SoMa Plan first got rolling, over five years -- the date on the EIR is 2011 – we saw immediately that it was basically a Downtown expansion plan. And from that date, we have insisted with the Department and with this Commission that the neighborhood building had equal priority with the economic expansion agenda. And the staff and the Commission have generally supported that.

"But 'equal' really means equal. It doesn't mean, you know, window dressing. It means making it real. And when we look at what actually comes from the department, it's hard to believe that we are getting that goal with equal priority because, when you look at this EIR and you look at the public services section, which is where all the neighborhood elements that matter for everyday life -- recreation centers, police, fire, childcare, preschool, schools, all those topics -- you don't find it.

"There is no public services analysis in this Draft EIR because it was in -- the initial study done several years ago determined that, gee, 5200 new households and 21,000 new jobs don't really add enough demand for new public services.

"Now, perhaps -- I mean, to me that's ludicrous; 5200 new households and 21,000 employees certainly do. But since you must look at cumulative consequences in CEQA -- the adjacent South of Market to the west of Sixth Street, which is also growing dramatically, and of course, the adjacent Rincon Hill Waterfront Transbay neighborhood to the east of Central SoMa, which is growing more, enormously. All combined, the whole South of Market clearly will have a very large new demand for public services.

"The quality of life issues of residents need more police support, they need more street cleaning.

"But the one I really want to focus on – and the school issue is dramatically important as well. But I really want to focus on the crisis we have right now, which is there is nowhere near enough childcare facilities in the South

of Market in the Central City to support the population boom of preschoolers we are witnessing every day. We see it.

"And you add 5200 more households in Central SoMa, an equal in number in the west, and 10,000 more in the east, and what do you think? Where is the plan? Where is even the analysis?" *(John Elberling, San Franciscans for Reasonable Growth, Hearing Transcript, January 26, 2017 [O-SFRG-2.1])*

"Not only does [the Draft EIR] fail to evaluate the CSP's project-specific and cumulative South of Market-wide impacts of 10s of thousands of new residents and workers on Public Services, as detailed in our Comment of January 17, it thereby also fails to identify those impacts as cumulatively Significant and then propose Mitigation Measures as required by CEQA." *(John Elberling, The Yerba Buena Neighborhood Consortium, Letter, February 13, 2017 [O-YBNC-Elberling.1])*

Response PS-2

The comments state that the Draft EIR's analysis, including its cumulative analysis, of public services is inadequate, in part because of the difference in growth projections between those in the Initial Study and those in the Draft EIR. The comments also dispute the Initial Study's conclusion that population and employment growth in the Plan Area would not result in significant effects on public services and claim that traffic congestion would increase emergency response times in the Plan Area.

It is not necessary for an EIR to evaluate the adequacy of public services, either individually or cumulatively, or to ensure that adequate services are provided. Rather, CEQA is concerned with the physical impacts of a project on the environment. As defined in CEQA Guidelines Section 15360, the environment consists of "the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance." Here, the Initial Study evaluated public services and determined that the Plan would not result in the need for new facilities, the construction of which could result in significant physical impacts on the environment, which is the question to be answered under CEQA. As explained in Response GC-2, p. RTC-375, Initial Study p. 121 states that should the Fire Department (or Police Department or other City agency) determine at some point that new facilities are needed, any potentially significant effects from construction of such facilities "would be similar to those anticipated by development under the Plan, such as noise, archeological impacts, air quality impacts such as emissions of dust and other pollutants, including diesel exhaust, and temporary street closures or other traffic obstructions." That is, construction of a new fire station, police station, or other comparable government facility would not result in new significant impacts not already analyzed; thus, the effects would already have been addressed in the Draft EIR. The Draft EIR identified a number of significant effects, including significant effects that cannot be mitigated to a less-than-significant level (refer to Table RTC-5, Significant and Unavoidable Impacts for the Central SoMa Plan), from growth in the Plan Area, and construction of new governmental facilities, should it be warranted, could contribute incrementally to such Plan-level impacts. Should such facilities be constructed, they would be subject to applicable mitigation measures identified in the Draft EIR, just as would any other physical development in the Plan Area. Cumulative public services impacts are discussed under Impact C-PS-1, on Initial Study p. 123.

Concerning the comment that traffic congestion would increase emergency response times in the Plan Area, see Response TR-12, p. RTC-180, which explains that the Draft EIR discloses that proposed Plan street network changes would result in a significant impact on emergency vehicle access. Therefore, the Draft EIR identifies Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, p. IV.D-81, to reduce the impact on emergency vehicle access to a less-than-significant level.

Concerning differences in growth forecasts between the Initial Study and the Draft EIR, please see Response PD-6, p. RTC-52, which explains the reasons for the differences and concludes that the analyses in the Initial Study and the Draft EIR remain valid despite the differences between the growth forecasts presented in the Initial Study and the Draft EIR, and no revisions to the Initial Study or the Draft EIR are required.

Concerning a comment about the need to evaluate "social services," such services, like childcare discussed above, are not evaluated under CEQA as they are not generally provided by entities that require special-purposes buildings (unlike, for example, fire stations or police stations). Therefore, as described in Response PS-1, p. RTC-332, no physical impacts would result from any increased demand for social services.

Regarding traffic congestion and its effects on public services, the Draft EIR evaluated this issue in Section IV.D, Transportation and Circulation. The Draft EIR identified significant effects related to emergency vehicle access as a result of traffic congestion and identified mitigation to reduce the effects to a less-than-significant level (see Impact TR-8, Draft EIR p. IV.D-79, and Impact C-TR-8, Draft EIR p. IV.D-108).

Regarding the comment that more street cleaning is needed in the Plan Area, this comment will be forwarded to the decision makers for their consideration. Overall, based on the foregoing discussion, no revisions to the Draft EIR are required.

Biological Resources

The comments and corresponding responses in this section cover topics in Initial Study Topic E.13, Biological Resources (Draft EIR Appendix B). These include topics related to:

- Comment BI-1: Biological Resources Impact Analysis

Comment BI-1: Biological Resources Impact Analysis

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

O-CSN-1.35
O-CSN-1.67

"**L. The Plan will have Significant Biological Impacts Related to Bird Strikes that are Inadequately Analyzed in the DEIR.**

"The DEIR concludes that the Plan will not have significant biological impacts. Wildlife biologist, Dr. Shawn Smallwood, Ph.D. concludes that the DEIR's conclusion ignores substantial evidence and that the Plan will have

significant impacts on several species. (Smallwood Comment). In particular, placing large number of buildings, particularly tall buildings, in the Plan area will result in thousands of bird deaths due to building collisions.

"First, Dr. Smallwood concludes that the DEIR uses an improper baseline. The Initial Study an[d] DEIR conclude that there will be insignificant impacts because the area is already urbanized. Dr. Smallwood points out that many protected species live in urbanized areas, and will have conflicts with the tall buildings proposed by the Plan. The DEIR ignores these impacts. The Initial Study relies on the California Natural Diversity Database to conclude that many species are not present in the area. Dr. Smallwood points out that the database is only used to confirm the presence of species, not the absence. Dr. Smallwood points out that the eBird database confirms the presence in the area of several protected bird species, including yellow warbler, brown pelican, and California gull, as well as multiple other species protected by the International Migratory Bird Treaty Act. A review of eBird also reveals the use of the area by many species of bird, including additional special-status species such as double-crested cormorant, tricolored blackbird, Peregrine falcon and Cooper's hawk. The eBird records reveal what any biologist should expect of San Francisco, and that is the use of the peninsula as a migration route by many species of bird. Building glazed or glass-façaded high-rises in the middle of this migration route will obviously destroy many migrating birds, and those birds not colliding with the buildings will have to exert extra energy during migration to fly around the buildings. Dr. Smallwood concludes that thousands of birds will be killed by collisions with buildings proposed to be built under the Plan, as well as by house cats owned by residents. These impacts are neither analyzed nor mitigated in the DEIR.

"Dr. Smallwood concludes that while the San Francisco bird ordinance is laudatory, it is not sufficient to mitigate the bird-strike impact to less than significant. This impact should be analyzed in a revised DEIR to determine feasible mitigation measures and alternatives. A plainly feasible alternative would be to limit the number of very tall buildings, or to adopt the Reduced Height alternative." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.35])*

"**BIOLOGICAL IMPACTS ASSESSMENT**

"The DEIR did not include an analysis of impacts and mitigation on biological resources. One of the key arguments for the DEIR's omission of a biological resources impacts assessment was given in the Initial Study (page 125), "*The occasional areas of ruderal, or weedy, vegetation generally provide habitat only for species habituated to urban life and high disturbance levels*." The argument is that because the site is already urbanized and because the wildlife species that occur there are adapted to urban conditions, the proposed project poses no potential adverse impacts to wildlife. Using this logic, however, there would be no reason to perform biological resource assessments for any proposed projects in California because one can readily find anthropogenic conditions to which local species might have habituated. Whether species of wildlife might have habituated to local conditions is a contrived standard and not one that appears in CEQA, the CEQA guidelines, or in the judicial record.

"A second key argument for omitting a biological resources impacts assessment was the Initial Study's assertion (page 126), that "…*none of the reported occurrences of species documented in the CNDDB* [California Natural Diversity Data Base] *are within the Plan area*." The Initial Study, and now the DEIR, inappropriately relies on CNDDB to screen special-status species for occurrence likelihood. CNDDB is useful only for confirming the presence of a species, but cannot be used to conclude absence because the reporting to CNDDB is voluntary and not based on scientific sampling or equal access to properties. The limitations of CNDDB are well-known, and

they are summarized in a warning presented by CDFW on the CNDDB web site (https://www.wildlife.ca.gov/Data /CNDDB/About): "*We work very hard to keep the CNDDB and the Spotted Owl Database as current and up-to-date as possible given our capabilities and resources. However, we cannot and do not portray the CNDDB as an exhaustive and comprehensive inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of our customers*…" Lack of CNDDB records on the project area is an invalid reason for omitting the biological resources assessment.

"In other words, the reason for omitting a biological impacts assessment is that the Initial Study concluded: (1) There would be no significant impacts to wildlife caused by the construction of multiple high-rise and low-rise buildings, (2) There is no substantial change in conditions between the project reviewed in the 2013 Initial Study and the new project reviewed in the 2016 DEIR, and (3) The individual building projects would adhere to the San Francisco Planning Department's (2011) building design guidelines. The first reason is flawed because the Initial Study incorrectly used CNDDB and incorrectly assumed that habituated wildlife will be safe wildlife in the face of transparent and reflective building facades. The second reason is flawed because the new project is obviously very different from the project that was subjected to the 2013 Initial Study. The buildings are much taller. The third reason is more compelling, but it still does not justify omission of a biological resources impacts assessment in the DEIR. The DEIR needs to include reasonable predictions of likely bird-window collision fatality rates. The discussion needs to be had about how many birds of special-status species and species protected by the International Migratory Bird Treaty Act are likely to perish each year after these high-rises are thrust into the aerial habitat space of migrating and resident birds.

"A quick review of eBird (http://ebird.org/ebird/explore) revealed 12 August 2016 nocturnal visits on the project site by special-status species including yellow warbler, brown pelican, and California gull, as well as multiple other species protected by the International Migratory Bird Treaty Act. A review of eBird also reveals the use of the area by many species of bird, including additional special-status species such as double-crested cormorant, tricolored blackbird, Peregrine falcon and Cooper's hawk. The eBird records reveal what any biologist should expect of San Francisco, and that is the use of the peninsula as a migration route by many species of bird. Building glazed or glass-façaded high-rises in the middle of this migration route will obviously destroy many migrating birds, and those birds not colliding with the buildings will have to exert extra energy during migration to fly around the buildings.

"Beginning on page 129, the Initial Study discusses bird collisions with windows, inappropriately citing the San Francisco Planning Department's 2011 Standards for Bird Safe Buildings as the source of the estimated annual 100 million to 1 billion birds killed by windows across the USA. In fact, this estimate comes from Klem (1990), which was based on extremely limited survey effort and multiple assumptions and is likely long since obsolete (more on this later). Whereas the Initial Study discusses the bird-window collision issue, its conclusions about the likely impacts are inconsistent with the Precautionary Principle in risk assessment and unrealistic, and therefore do not justify the omission of a biological resources assessment in the DEIR. If anything, the discussion of bird-window collisions in the Initial Study should have prompted a focused and much-expanded biological resources assessment in the DEIR.

"The existing developed area is causing significant numbers of injuries and deaths of birds every year. For example, if there are homes or commercial buildings with windows, then there are ongoing impacts to birds. Window collisions are often characterized as either the second or third largest source or anthropogenic-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's

(1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. However, these estimates and their interpretation warrant examination because they were based on opportunistic sampling, volunteer study participation, and fatality monitoring by more inexperienced than experienced searchers.

"Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

"Homes with birdfeeders are associated with higher rates of window collisions than are homes without birdfeeders (Kummer and Bayne 2015, Kummer et al. 2016a), so the developed area might pose even greater hazard to birds if it includes numerous birdfeeders. Another factor potentially biasing national or North American estimates low was revealed by Bracey et al.'s (2016) finding that trained fatality searchers found 2.6× the number of fatalities found by homeowners on the days when both trained searchers and homeowners searched around homes. The difference in carcass detection was 30.4-fold when involving carcasses volitionally placed by Bracey et al. (2016) in blind detection trials. This much larger difference in trial carcass detection rates likely resulted because their placements did not include the sounds that typically alert homeowners to actual window collisions, but this explanation also raises the question of how often homeowner participants with such studies miss detecting window-caused fatalities because they did not hear the collisions.

"By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) were able to incorporate many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only two of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

"In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows,

especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

"The existing conditions – the developed area – is undoubtedly killing many birds each year. Not only are windows killing many birds, but so too are house cats, feral cats, electrocution distribution lines, electric power poles, and autos. This said, the proposed project will add a level of impact that is entirely missing from the CEQA review. Constructing buildings to 400 feet above ground will not only take aerial habitat from birds, but it will also interfere with the movement of birds in the region and it will result in large numbers of annual window collision fatalities.

"High-rise buildings intercept many nocturnal migrants as well as birds flying in daylight. Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager at al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building facades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building facades. From 24 days of survey over 48 day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5- story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities. There is ample evidence available to support my prediction that the proposed 200-foot to 400-foot tall buildings will result in many collision fatalities of birds.

"**COLLISION FACTORS**

"Below is a list of collision factors I found in the scientific literature. Following this list are specific notes and findings taken from the literature and my own experience.

(1) Inherent hazard of a structure in the airspace used for nocturnal migration or other flights

(2) Window transparency, falsely revealing passage through structure or to indoor Plants

(3) Window reflectance, falsely depicting vegetation, competitors, or open airspace

(4) Black hole or passage effect

(5) Window or façade extent, or proportion of façade consisting of window or other reflective surface

(6) Size of window

(7) Type of glass

(8) Lighting, which is correlated with window extent and building operations

(9) Height of structure (collision mechanisms shift with height above ground)

(10) Orientation of façade with respect to winds and solar exposure

(11) Structural layout causing confusion and entrapment

(12) Context in terms of urban-rural gradient, or surrounding extent of impervious surface vs vegetation

(13) Height, structure, and extent of vegetation grown near home or building

(14) Presence of birdfeeders or other attractants

(15) Relative abundance

(16) Season of the year

(17) Ecology, demography and behavior

(18) Predatory attacks or cues provoking fear of attack

(19) Aggressive social interactions

"(1) Inherent hazard of structure in airspace.—Not all of a structure's collision risk can be attributed to windows. Overing (1938) reported 576 birds collided with the Washington Monument in 90 minutes on one night, 12 September 1937. The average annual fatality count had been 328 birds from 1932 through 1936. Gelb and Delacretaz (2009) and Klem et al. (2009) also reported finding collision victims at buildings lacking windows, although many fewer than they found at buildings fitted with widows.

"(2) Window transparency.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the transparency of glass used in windows on the buildings (Klem 1989). Gelb and Delacretaz (2009) felt that many of the collisions they detected occurred where transparent windows revealed interior vegetation.

"(3) Window reflectance.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the reflectance of glass used in windows on the buildings (Klem 1989). Reflectance can deceptively depict open airspace, vegetation as habitat destination, or competitive rivals as self-images (Klem 1989). Gelb and Delacretaz (2009) felt that many of the collisions they detected occurred toward the lower parts of buildings where large glass exteriors reflected outdoor vegetation. Klem et al. (2009) and Borden et al. (2010) also found that reflected outdoor vegetation associated positively with collisions.

"(4) Black hole or passage effect.—Although this factor was not often mentioned in the bird-window collision literature, it was suggested in Sheppard and Phillips (2015). The black hole or passage effect is the deceptive appearance of a cavity or darkened ledge that certain species of bird typically approach with speed when seeking roosting sites. The deception is achieved when shadows from awnings or the interior light conditions give the appearance of cavities or protected ledges. This factor appears potentially to be nuanced variations on transparency or reflectance or possibly an interaction effect of both of these factors.

"(5) Window or façade extent.—Klem et al. (2009), Borden et al. (2010), Hager et al. (2013), and Ocampo-Peñuela et al. (2016) reported increased collision fatalities at buildings with larger reflective facades or higher proportions

of facades composed of windows. However, Porter and Huang (2015) found a negative relationship between fatalities found and proportion of façade that was glazed.

"(6) Size of window.—According to Kahle et al. (2016), collision rates were higher on large-pane windows compared to small-pane windows.

"(7) Type of glass.—Klem et al. (2009) found that collision fatalities associated with the type of glass used on buildings. Otherwise, little attention has been directed towards the types of glass in buildings.

"(8) Lighting.—Parkins et al. (2015) found that light emission from buildings correlated positively with percent glass on the façade, suggesting that lighting is linked to the extent of windows. Zink and Eckles (2010) reported fatality reductions, including an 80% reduction at a Chicago high-rise, upon the initiation of the Lights-out Program. However, Zink and Eckles (2010) provided no information on their search effort, such as the number of searches or search interval or search area around each building.

"(9) Height of structure.—I found little if any hypothesis-testing related to high-rise buildings, including whether another suite of factors might relate to collision victims of high-rises. Are migrants more commonly the victims of high-rises? I would expect that some of the factors noted in other contexts will not be important with the upper portions of high-rises, such as birds attacking reflected self-images, or the extent of vegetation cover nearby, or the presence or absence of birdfeeders nearby.

"(10) Orientation of façade.—Some studies tested façade orientation, but not convincingly. Confounding factors such as the extent and types of windows would require large sample sizes of collision victims to parse out the variation so that some portion of it could be attributed to orientation of façade.

"(11) Structural layout.—Bird-safe building guidelines have illustrated examples of structural layouts associated with high rates of bird-window collisions, but little attention has been towards hazardous structural layouts in the scientific literature. An exception was Johnson and Hudson (1976), who found high collision rates at 3 stories of glassed-in walkways atop an open breezeway, located on a break in slope with trees on one side and open sky on the other, Washington State University.

"(12) Context in urban-rural gradient.—Numbers of fatalities found in monitoring have associated negatively with increasing developed area surrounding the building (Hager et al. 2013), and positively with more rural settings (Kummer et al. 2016a). However, these relationships might not hold when it comes to high-rises.

"(13) Height, structure and extent of vegetation near building.—Correlations have sometimes been found between collision rates and the presence or extent of vegetation near windows (Hager et al. 2008, Borden et al. 2010, Kummer et al. 2016a, Ocampo-Peñuela et al. 2016). However, Porter and Huang (2015) found a negative relationship between fatalities found and vegetation cover near the building.

"(14) Presence of birdfeeders.—Dunn (1993) reported a weak correlation ($r = 0.13$, $P < 0.001$) between number of birds killed by home windows and the number of birds counted at feeders. However, Kummer and Bayne (2015) found that experimental installment of birdfeeders at homes increased bird collisions with windows 1.84-fold.

"(15) Relative abundance.—Collision rates have often been assumed to increase with local density or relative abundance (Klem 1989), and positive correlations have been measured (Dunn 1993, Hager et al. 2008). However,

Hager and Craig (2014) found a negative correlation between fatality rates and relative abundance near buildings.

"(16) Season of the year.—Borden et al. (2010) found 90% of collision fatalities during spring and fall migration periods. The significance of this finding is magnified by 7-day carcass persistence rates of 0.45 and 0.35 in spring and fall, rates which were considerably lower than during winter and summer (Hager et al. 2012). In other words, the concentration of fatalities during migration seasons would increase after applying seasonally-explicit adjustments for carcass persistence.

"(17) Ecology, demography and behavior.—Klem (1989) noted that certain types of birds were not found as common window-caused fatalities, including soaring hawks and waterbirds. Cusa et al. (2015) found that species colliding with buildings surrounded by higher levels of urban greenery were foliage gleaners, and species colliding with buildings surrounded by higher levels of urbanization were ground foragers. Sabo et al. (2016) found no difference in age class, but did find that migrants are more susceptible to collision than resident birds.

"(18) Predatory attacks.—Panic flights caused by raptors were mentioned in 16% of window strike reports in Dunn's (1993) study. I have witnessed Cooper's hawks chasing birds into windows, including house finches next door to my home and a northern mocking bird chased directly into my office window.

"(19) Aggressive social interactions.—I found no hypothesis-testing of the roles of aggressive social interactions in the literature other than the occasional anecdotal account of birds attacking their self-images reflected from windows. However, I have witnessed birds chasing each other and sometimes these chases resulting in one of the birds hitting a window.

"**SOLUTIONS**

"Given the magnitude of bird-window collision impacts, there are obviously great opportunities for reducing and minimizing these impacts going forward. Existing structures can be modified or retrofitted to reduce impacts, and proposed new structures can be more carefully sited and designed to minimize impacts. However, the costs of some of these measures can be high and can vary greatly, but most importantly the efficacies of many of these measures remain uncertain. Both the costs and effectiveness of all of these measures can be better understood through experimentation and careful scientific investigation. Post-construction fatality monitoring should be an essential feature of any new building project. Below is a listing of mitigation options, along with some notes and findings from the literature.

"***(1) Retrofitting to reduce impacts***
(1A) Marking windows
(1B) Managing outdoor landscape vegetation
(1C) Managing indoor landscape vegetation
(1D) Managing nocturnal lighting

"(1A) Marking windows.—Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 67% after placing decals on windows. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015). In an experiment of

opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film.

"***(2) Siting and Designing to minimize impacts***
(2A) Deciding on location of structure
(2B) Deciding on façade and orientation
(2C) Selecting type and sizes of windows
(2D) Designing to minimize transparency through two parallel facades
(2E) Designing to minimize views of interior plants
(2F) Landscaping to increase distances between windows and trees and shrubs

"**GUIDELINES ON BUILDING DESIGN**

"If the project goes forward, it should at a minimum adhere to available guidelines on building design intended to minimize collision hazards to birds. The American Bird Conservancy (ABC) produced an excellent set of guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015). The City of San Francisco (San Francisco Planning Department 2011) also has a set of building design guidelines, based on the excellent guidelines produced by the New York City Audubon Society (Orff et al. 2007). The ABC document and both the New York and San Francisco documents provide excellent alerting of potential bird-collision hazards as well as many visual examples. The San Francisco Planning Department's (2011) building design guidelines are more comprehensive than those of New York City, but they could have gone further. For example, the San Francisco guidelines probably should have also covered scientific monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced.

"Although the San Francisco Planning Department deserves to be commended for its building design guidelines, some of its guidelines are in need of further review and consideration. Scientific research and understanding of the bird-window collision impacts remain low on the learning-curve, so we should expect rapid advances in understanding and solutions as scientific investigations are better funded and monitoring efforts expand and experimentation is implemented. At the time of the 2011 guidelines, only one building had been scientifically monitored for bird-window collisions (Kahle et al. 2016), so very few local scientific data on the impacts were available in San Francisco. As a result, too many of the guidelines are based on anecdotes and speculation. For example, the bird collision zone of 0-60 feet above ground (San Francisco Planning Department 2011:28) appears to have been based on speculation. No doubt low-rise buildings can kill many birds annually, but the evidence of this does not preclude high-rises from also killing many birds annually. When it comes to high-rises, it has often been difficult to determine how high a bird was flying when it collided with the building. Collision victims are found at the base of the building and could have fallen from 1 to 6 stories up, or perhaps from 7 to 40 stories up. It needs to be recognized that although the guidelines are commendable as a starting point, much remains to be learned about bird-window collisions, and flexibility for considering other measures or revised measures is warranted.

"In another example of a standard that could perhaps use more foundation, the urban bird refuge standard (San Francisco Planning Department 2011:28) includes thresholds of 300 feet and 2 acres of open space. These thresholds appear to have been arbitrarily derived. What scientific evidence supports either of them? How

would these standards bear on nocturnal migrants encountering large glass windows at 390 feet above ground? I am not arguing that these standards are incorrect, but rather that they might be arbitrary and therefore bear opportunities for improvement.

"The DEIR should be revised to address some of the San Francisco Planning Department's (2011) building design guidelines for the project as a whole. There is no reason why the DEIR could not address macro-setting guidelines in the forms of checklist and text discussion. To be consistent with its own guidelines, the San Francisco Planning Department also might not want to follow through on its plan to amend the Planning Code to require greening of at least 50% of each site area and to construct at least 50% of roof area as living roofs (DEIR page II-34).

"**MITIGATION**

"The bird-collision impacts potentially caused by the project could be mitigated to less than significant levels by implementing three measures:

1. Adhere to the San Francisco Planning Department's (2011) building design guidelines and to any other avoidance and minimization measures that have been learned additional or since the 2011 guidelines document was produced;
2. Fund long-term scientific monitoring of the impact so that lessons learned can be applied to future projects or perhaps to effective retrofit solutions; and,
3. Offset impacts that could not be avoided, minimized or reduced by compensating for the impacts. Compensation can include habitat protections elsewhere or donations to wildlife rehabilitation facilities that will likely receive and care for injured birds.

"**CONCLUSION**

"The proposed project would impose 200- to 400-foot tall high-rises in the aerial habitat of many birds. Birds migrating through San Francisco at night, in route north or south along the coast, would encounter these high-rises. Many of these nocturnal migrants would be attracted to light emissions from the buildings or would encounter the buildings by chance, and many of these birds would perish due to collision with these buildings. Other birds would encounter the high-rises during daylight hours and would be deceived by the transparency or reflected images in the glass of windows. Many of these birds would perish. At lower stories – those near the ground – windows reflecting planted trees would deceive birds into flying toward the reflected images and to their deaths. The numbers of collision fatalities could be very large, and some of the collision victims could be members of species that are rare or declining, and some could be special-status species, such as Sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperi*), Olive-sided flycatcher (*Contopus cooperi*), Least Bell's vireo (*Vireo belli pusillus*), yellow warbler (*Setophaga petechia*), and Lawrence's goldfinch (*Spinus lawrencei*). However, it should be remembered that nearly all birds in California are protected by the international Migratory Bird Treaty Act. The EIR should be revised to address these potential impacts. Available bird-safe building guidelines should be followed where appropriate, but additional measures will be needed where the guidelines are either wrong or based on poor foundation.

"The EIR should be revised to include a biological resources assessment, which should report reasonable predictions of collision mortality. The EIR should also provide more detail about which building design guidelines will be implemented under which conditions. For example, macro-setting guidelines could be

addressed in the EIR. The EIR should also provide details about fatality monitoring needed to quantify collision mortality. Finally, it should provide details about compensatory mitigation to offset the collision fatalities that cannot be prevented in building design." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.67])*

Response BI-1

The comment states that because the Plan could adversely affect special-status bird species, this impact should be evaluated in the Draft EIR rather than in the Initial Study (Draft EIR Appendix B).

The commenter incorrectly characterizes the analysis and conclusions in the Initial Study. As stated on Initial Study p. 131, "changes in building heights and density, as well as construction of new buildings in the current prevailing architectural style, which are often characterized by large glazed expanses, could have a potentially adverse effect on raptors, as well as resident and migratory passerines, by increasing the risk for avian collisions with buildings." However, for an adverse effect to rise to the level of significance, the effect must be substantial, whether it involves effects on special-status species,[116] including habitat modification, or interference with the movement of native resident species or native resident or migratory wildlife corridors. Initial Study pp. 129–131 contains a detailed discussion of the effects of avian collisions with buildings and other structures. The Initial Study also details the City's Standards for Bird-Safe Buildings contained in Planning Code Section 139 and the protections they would afford resident and migratory birds despite new construction in the Plan Area, given that all new buildings must comply with the Standards. Finally, Initial Study p. 126 notes, "Individual projects would also be required to comply with the federal Endangered Species Act, California Fish and Game Code and the Migratory Bird Treaty Act (MBTA) which protect special-status species." Accordingly, the Initial Study concludes that compliance federal and state law and with the Standards of Planning Code Section 139 would ensure that potential impacts related to bird hazards would be less than significant. Second, the EIR authors disagree with the commenter's analogy that the Initial Study's methodology leads to a conclusion that there is "no reason to perform biological resource assessments for any proposed projects in California." It is evident that certain locales are richer in wildlife (and plant) species, including special-status species, while others (such as the Plan Area) are less so.

The comment states that the Initial Study inappropriately relies on the California Natural Diversity Database (CNDDB) to screen special-status species for occurrence likelihood. According to the commenter, "CNDDB is useful only for confirming the presence of a species, but cannot be used to conclude absence because the reporting to CNDDB is voluntary and not based on scientific sampling or equal access to properties." The commenter refers to the eBird database to document that special-status bird species have visited the Plan Area.

The Initial Study does not dismiss the presence of special-status bird species based on CNDDB reports. While the Initial Study concludes that the likelihood of such species is low, it nevertheless states on p. 126 that "there is the potential for some special-status bird and bat species to be present in the Plan area," which the Initial

[116] As stated in footnote 95 on Initial Study p. 126, the Initial Study defines special-status species as plant and wildlife species that are: listed as rare, threatened, or endangered under the federal or state endangered species acts; candidates under federal or state law; formerly designated as federal Species of Concern or state Species of Special Concern; designated "special animals" or "fully protected" by the state; raptors (birds of prey), protected by the California Fish and Game Code Section 3503.5; and candidate species that may be considered rare or endangered pursuant to CEQA Guidelines Section 15380(b).

Study goes on to analyze. The eBird database (like the CNDDB) presents "voluntary" reports of species presence. Of the 100 "hot spots" (locations of most bird species sightings), virtually all are within parks and/or along the ocean or bay shoreline and/or near other bodies of water. Only one of these 100 hot spots is near the Plan Area—Mission Creek, and this site is on an extension of San Francisco Bay. Within the Plan Area, bird species are reported on eBird at Yerba Buena Gardens and at the Alice Street Gardens, as well as at nearby Victoria Manalo Draves Park. With the exception of a savannah sparrow reported at Mission Creek in 1995, none of the species documented is threatened or endangered. However, as noted by the commenter, several California Species of Special Concern and raptors were reported at Mission Creek and at the two sites within the Plan Area. With the exception of 25 California gulls (formerly a California Species of Special Concern) reported at Mission Creek in 2013 and seven at Yerba Buena Gardens in 2015, fewer than 10 of any individual special-status species are reported in more than 10 years of data. These numbers do not support a conclusion that a substantial number of special-status bird species is present, much less that a substantial adverse effect could result from implementation of the Plan.

The commenter also incorrectly asserts that, "the new project is obviously very different from the project that was subjected to the 2013 Initial Study. The buildings are much taller." The Initial Study analyzed two height options—a Mid-Rise Height Option (Option A) and a High-Rise Height Option (Option B), as well as a Land Use Variant, which did not affect proposed height limits. In general, "the impacts presented [in the Initial Study] are typically those of Option B, the High-Rise Height Option, because this option would allow for incrementally greater development potential, residential and non-residential, than would either Option A, the Mid-Rise Height Option, or the Land Use Variant" (Initial Study p. 73). The height limits proposed under Option B of the Initial Study, based on the draft Central Corridor Plan of 2013, are nearly identical to those evaluated in the Draft EIR, based on the 2016 Central SoMa Plan, with the exception of increased heights in the 2016 Plan on the block bounded by Bryant, Fifth, Brannan, and Sixth streets (the site of the existing Flower Mart) and on a small area at the southwest corner of Fifth and Howard streets. With the exception of those two sites, the tower heights—350, 200, 350, and 240 feet, east to west, on the south side of Harrison Street between Second and Fourth streets, and 200 to 400 feet south of Bryant Street—are identical (compare Initial Study Figure 7, Option B High-Rise Height Districts, p. 18, to Draft EIR Figure II-7, Proposed Plan Area Height and Bulk Districts, p. II-19).

The comment notes that a study of bird-building collisions in San Francisco (Kahle et al. 2016) "found 355 collision victims within 1,762 days under a 5-story building." However, this study was conducted at the new California Academy of Sciences, which is located in Golden Gate Park, a completely different environment than the Plan Area, in that the Academy of Sciences is within the city's largest park and is largely surrounded by vegetation, including mature trees suitable for use by nesting birds. Moreover, the Academy itself is within a building with a "green roof" that contains vegetation trays made from tree sap and coconut husks. According to the Academy's website, an estimated 1.7 million plants fill the trays, creating habitat for birds, insects, other animals.[117] Of the open spaces in and near the Plan Area, only Moscone Center, north of the Plan Area, is considered an urban bird refuge under the Planning Code.[118]

[117] California Academy of Sciences website, "Living Roof," https://www.calacademy.org/exhibits/living-roof, accessed July 28, 2017.

[118] San Francisco Planning Department, Urban Bird Refuge map, http://default.sfplanning.org/publications_reports/library_of_cartography/Urban_Bird_Refuge_Poster.pdf, accessed July 28, 2017.

The comment also takes issue with certain aspects of, and suggests revisions to, the City's Standards for Bird Safe Buildings. These comments are not related to the adequacy or accuracy of the analysis contained in the Initial Study and Draft EIR and will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

In summary, the Initial Study (Draft EIR Appendix B) adequately analyzed effects on special-status birds, properly determined that the impact would be less than significant, and analyzed a project that is essentially the same as what is currently proposed. While development pursuant to the Plan would no doubt result in some adverse effects to bird species, including direct mortality and potentially some interference with bird migration, the effects would not rise to the level of a significant impact under CEQA. To further reduce impacts to special-status birds, the Draft EIR proposes Improvement Measure I-BI-2, Night Light Minimization, in which the Planning Department would work with project sponsors to reduce exterior and interior building lighting. As such, no revisions to the Initial Study or Draft EIR are required.

Geology and Soils

The comments and corresponding responses in this section cover topics in Initial Study Topic E.14, Geology and Soils (Draft EIR Appendix B). These include topics related to:

- Comment GE-1: Construction on Bay Fill

Comment GE-1: Construction on Bay Fill

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

I-Hestor-1.3
I-Hestor-1.20
I-Hestor-2.4
I-Whitaker.3

"Soil impacts for the SoMa Plan Area is mostly on land created by filling San Francisco Bay. The bay went deep into what is now the South of Market. The high water table there caused land failures and sand boils in Loma Prieta. Fatal injuries occurred. The area of the Millennium tower is similar fill. Because that building was not anchored to bedrock, resulting problems tilted the building. Adjacent soil was dewatered for construction of nearby Transit Center buildings. What will be the impacts of trenching along Brannan cited by Whitaker for the projects anticipated under the Central SoMa Plan. What are impacts on existing buildings north of Brannan? Please include analysis of groundwater table draw down related to tunneling. *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.3])*

"**The INITIAL STUDY (Appendix B - p.135)** improperly scoped out the issue of geology and soils. Please include map p. 138 which shows that the vast majority of the current Central SoMa Plan area (3rd - 6th Sts) is artificial fill (former SF Bay) and **map p. 143** which shows that same area is a liquefaction zone."

"The soils condition in this part of Central SoMa - Bay fill - is similar to that of the Millennium tower in the Transit Center which building was not anchored to bedrock. See my comments above on first page. Different types of construction are required for different building heights."

"Low rise housing - which can be relatively dense low and moderate income housing and family housing - doesn't require foundations driven to bedrock. As heights increase dramatically for office buildings and market rate housing, the type of housing construction will change. Where the soil is filled San Francisco Bay and heights remain modest, even if dense low-rise housing is allowed, construction costs come down.

"There needs to be discussion IN THE EIR of what method of construction is mandated by the SOILS and the high water table of the land. The Central So Ma Plan should learn from the sobering experience of the Millennium tower."

"Earthquake impacts are more than ruptures on faults. Loma Prieta had serious impacts in this area of the south of Market. Not just on the Marina." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.20])*

"This area is mostly all bay fill. It was the bay before it was filled. On bay fill, you can't build types of housing without driving up the cost. You are going to have to have soils analysis, and you're going to have to have piles driven into housing [sic]. It drives up the possibility of housing." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.4])*

"With a sinking Millennium Tower at 301 Mission Street and what we already know is a problem with properties sinking in parts of Central SoMa, the report needs to provide mitigations and deeper study of how the foundations of existing buildings will not end up settling more due to soil and dewatering practices - and include a means for monitoring from the start so we don't have another fiasco of finger pointing between the Department of Building Inspection, developers, and potentially other stakeholders." *(James Whitaker, Email, February 12, 2017 [I-Whitaker.3])*

Response GE-1

Liquefaction and Settlement

The comments assert that geology and soils were improperly scoped out in the Initial Study and should have been included in the Draft EIR because most of the Plan Area is underlain by fill materials and located in an area of liquefaction potential and that individual development projects could experience settlement, similar to the Millennium Tower, which does not have a foundation supported on bedrock. The comments also state that the Draft EIR should identify what construction methods are mandated to avoid adverse effects related to settlement and that settlement effects on existing buildings and necessary monitoring should also be discussed in the Draft EIR.

As stated in CEQA Guidelines Section 15063(c), one purpose of the Initial Study is to assist in the preparation of an EIR by focusing the EIR on the effects determined to be significant; effects determined not to be significant can be adequately addressed in the Initial Study. The analysis in the Initial Study concluded that impacts related

to geology and soils would be less than significant with implementation of standard engineering and design protocols that would be further specified as part of the building permit process and in compliance with the California and San Francisco Building Codes and State Seismic Hazards Mapping Act. Since issues pertaining to geology and soils were found to be less than significant in the Initial Study as further clarified below, the Draft EIR need not contain an analysis of geologic impacts, nor the maps requested by the commenter. As such, no revisions to the Initial Study or Draft EIR are required to address the comment.

As discussed in Impact GE-1, Initial Study pp. 139 through 144, seismic effects resulting from earthquakes include fault rupture, groundshaking, seismically induced ground failure (such as liquefaction), and seismically induced landslides. The Plan Area would not be subject to fault rupture or seismically induced landslides, as discussed on Initial Study pp. 139 and 144. While the Plan Area could be subject to very strong to violent groundshaking in the event of a major earthquake, individual development projects implemented pursuant to the Plan would not expose people or structures to substantial adverse effects related to groundshaking because the buildings would be designed and constructed in accordance with the most current San Francisco Building Code, which incorporates California Building Code requirements, as noted on Initial Study pp. 140 and 141. Compliance with the building codes would not eliminate such impacts, but the codes have been developed to reduce potential impacts to acceptable seismic risk levels and, thus, to less-than-significant levels. As also discussed in the impact analysis, proposed buildings over 160 feet tall could be subject to compliance with the San Francisco Department of Building Inspection's (DBI's) Administrative Bulletin 083 (AB-083), Requirements and Guidelines for the Seismic Design of New Tall Buildings using Non-Prescriptive Seismic-Design Procedures.[119] This bulletin specifies the requirements and guidelines for the non-prescriptive design of new tall buildings that are over 160 feet high to ensure that the design meets the standards of the San Francisco Building Code.[120]

In addition, DBI's Administrative Bulletin 082 (AB-082), Guidelines and Procedures for Structural Design Review, specifies the guidelines and procedures for structural design review during the application review process for a building permit. In addition to requirements for a site-specific geotechnical report as articulated in Building Code Section 1803 and DBI Information Sheet S-05, Geotechnical Report Requirements, structural design review may result in review by an independent structural design reviewer. AB-082 describes what types of projects may require this review, the qualifications of the structural design reviewer, the scope of the structural design review, and how the Director of DBI as the building official would resolve any disputes between the structural design reviewer and the project's engineer of record. DBI has also published Information Sheet S-18, Interim Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review for New Tall Buildings (November 9, 2017), to provide interim guidelines and procedures to supplement and clarify AB-082 and AB-083. Information Sheet S-18, which addresses buildings 240 feet in height and taller, states that, for peer review of such buildings, the Structural Design Team must include a licensed geotechnical engineer. Sheet S-18 also states that the Structural Design Peer Review Team must include a California-registered geotechnical engineer or civil engineer with geotechnical experience who will meet with the project engineer with DBI staff, as needed, throughout the building's design process. Among the findings to be provided to DBI by the Structural Design Peer Review Team are those concerning foundation design,

[119] Non-Prescriptive Seismic Design deviates from one or more of the specific standards contained in the San Francisco Building Code.

[120] DBI Administrative Bulletins and Information Sheets are available at http://sfdbi.org/administrative-bulletins and http://sfdbi.org/information-sheets, respectively.

geotechnical and geological investigations, soil-foundation-structure interaction, foundation or building settlement, and effects of dewatering on the project site and its vicinity and of construction-related activities on foundation performance of neighboring structures.

It is further noted that DBI is in the process of expanding the potential role of third-party reviewers. DBI has issued a Request for Qualifications (RFQ# DBI2017-21STRGEOTECH, As-Needed Consultant Services for Structural Design and Geotechnical Review) for selection of a pre-qualified list of consultants/professionals and academic experts from which DBI may choose prospective consultants on an as-needed basis. Consultants are being sought with expertise in the following areas: structural design review/practicing structural engineer, structural design review/academia, and geotechnical and geological engineering review. According to the RFQ, the expertise being sought would potentially expand DBI's structural design review beyond the aspects set forth in AB-082 to incorporate a number of geotechnical and foundation concerns, including review of individual projects' geotechnical reports, site soil classifications, foundation recommendations, deep foundation evaluations, earth pressure recommendations, soil-structure interaction review, building settlement analysis, and excavation and groundwater monitoring.[121]

As noted by the commenter, artificial fills in the Plan Area are mapped in Initial Study Figure 41, Geology in the Plan Area, p. 138, and the liquefaction potential within the Plan Area is shown in Initial Study Figure 42, Liquefaction Hazard Zone, p. 143. As identified on Initial Study pp. 142 and 144, individual development projects implemented pursuant to the Plan could be subject to liquefaction. However, each project would be required to prepare a geotechnical report pursuant to the State Seismic Hazards Mapping Act. The building plans would be reviewed by DBI for conformance with the recommendations in the site-specific geotechnical report prior to the issuance of building permits. The geotechnical report would assess the nature and severity of liquefaction and other geologic hazards onsite for individual projects and recommend site-specific project design and construction features that would reduce the identified hazards to an acceptable risk level.

Building Code Section 1803, Geotechnical Investigations, specifies the circumstances under which a site-specific geotechnical report is required. Site-specific geotechnical investigations shall be conducted in accordance with Building Code Section 1803.2 and reported in accordance with Section 1803.6. San Francisco's Geotechnical Report Requirements are further described in DBI Information Sheet S-05, Geotechnical Report Requirements, which describes the scope of work that requires submittal of a geotechnical report. Under the Building Code and the Seismic Hazards Mapping Act, the investigation must address seismicity, liquefaction, corrosive soils, and other geological conditions present at the site. The report must be prepared by a California-licensed geotechnical engineer or a civil engineer experienced in geotechnical engineering.[122] The recommendations in the geotechnical report must consider the most recent version of California Geological Survey Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, for sites located within a seismic hazard zone. California Building Code Section 1803.1.1.3 requires that city building departments review geotechnical reports for individual projects to ensure conformance with the recommendations of the geotechnical report as a condition of building permit issuance.

[121] BI, Request for Qualifications RFQ# DBI2017-21STRGEOTECH, October 30, 2017, http://sfdbi.org/sites/default/files/RFQ%20%23DBI2017-21%20StrGeoTech.pdf, accessed November 22, 2017.

[122] California Code of Regulations Title 14, Article 10, The Seismic Hazards Mapping Regulations, allows a certified engineering geologist having competence in the field of seismic hazard evaluation and mitigation to prepare the geotechnical report in compliance with the Seismic Hazards Mapping Act [C.C.R., Section 3724(b) Specific Criteria for Project Approval].

San Francisco Building Code Section 1803.5.12 provides further specifications for determining the potential for liquefaction and related hazards and assessing the potential consequences such as total and differential settlement, lateral soil movement, lateral soil loads on foundations, and reductions in the load-bearing capacity of the soil. Measures to address the effects of liquefaction must be recommended in the site-specific geotechnical report. Such measures must also address the appropriate foundation type and depths and selection of the appropriate structural systems to accommodate anticipated ground displacements and forces. If ground stabilization is used, the foundation and structural design would be based on stabilized conditions. The recommendations of the geotechnical investigation must be incorporated into the project design and are subject to review for conformance by DBI as part of the building permit approval process.

DBI would ensure that the geotechnical and seismic recommendations of the site-specific investigation would be consistent with current Building Code requirements through their review of the building permit application submittals as discussed in DBI Administrative Bulletins AB-032, Site Permit Processing, and AB-082, Guidelines for Procedures for Structural Design Review. As explained in AB-032, construction work at a project site is controlled and scheduled by DBI through the Site Permit Review Process. The first step of the Site Permit Review process is submittal of a Site Permit submittal package that includes a Structural Design Criteria Document. AB-082 specifies that under the San Francisco Building Code, DBI can require review of this document by an independent registered design professional in some cases. The site permit is not issued until DBI is satisfied that the submittal package meets all code requirements.

The issuance of the site permit, the first step in DBI's process, does not allow any actual construction onsite. Construction of specific elements of the project is addressed through addenda to the overall building construction plans. Addenda to the site permit are required for each specific phase of construction. Each addendum to the site permit must be approved separately by DBI for that phase of the construction process to proceed. Addenda are required to address grading, foundation design, superstructure design (basic building and structural frame), mechanical and electrical systems, and any work excluded from the superstructure and mechanical and electrical system addenda (a final addendum).

Implementation of the site-specific geotechnical investigation and the site permit review process as conducted by DBI and described above would also ensure that the effects of settlement on adjacent features as a result of soil excavation, and pile driving (addressed in Impact GE-3, Initial Study pp. 145 through 147) would be less than significant.

Compliance with the San Francisco Building Code requirements and related permit conditions is mandatory. The specific methods for addressing seismic and settlement hazards would be based on site-specific conditions and would be identified in the site-specific geotechnical investigation for individual development projects implemented pursuant to the Plan. It is not necessary for the CEQA analysis to mandate specific foundation types or other methods to alleviate geotechnical hazards because implementation of Building Code requirements as enforced through DBI's Site Permit Review Process, including review of the site permit addenda, would ensure that these hazards would be less than significant. Furthermore, it would not be possible or appropriate for a programmatic EIR to evaluate project-specific conditions.

Concerning the Millennium Tower, that project is not within the Plan Area. Therefore, based on the foregoing discussion, no changes to the Draft EIR are required.

Cost of Housing

The comment expresses concern over the potential cost of housing in the Plan Area because of the cost of constructing pile-supported foundations in areas of artificial fill. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. In addition, CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Therefore, it is not necessary to analyze the cost of housing in the Initial Study, and no changes to the Draft EIR are required. Regardless, the comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. Also note that as described in Initial Study Impact GE-1, p. 142, buildings constructed pursuant to the Plan could be supported on a number of foundation types, including mat foundations or driven piles supported in the stiff clays, dense sands, and bedrock that underlie the Plan Area. As described in the Initial Study and above, the appropriate foundation type for each building constructed in the Plan Area would be determined on the basis of a site-specific geotechnical investigation, and the design would be subject to review and approval by DBI in accordance with San Francisco's Site Permit Review Process and subsequent addenda.

Tunneling

The comment also requests analysis of groundwater table drawdown related to tunneling. Note that no tunneling is proposed or anticipated as a consequence of Plan adoption. Therefore, no analysis of this topic is necessary.

D.17 Plan Merits

The comments and corresponding responses in this section cover topics generally related to the merits of the proposed Plan, as described in Draft EIR Chapter II, Project Description. These include topics related to:

- Comment PM-1: Do Not Support the Plan
- Comment PM-2: Support for the Plan
- Comment PM-3: Jobs-Housing Balance—Plan Area
- Comment PM-4: Plan Will Adversely Affect Central SoMa Neighborhood
- Comment PM-5: Youth and Family Zone Special Use District
- Comment PM-6: Restrictions on Building Market-Rate Housing

Comment PM-1: Do Not Support the Plan

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

O-SOMCAN-Cabande.3
O-YBNC-Elberling-3.4

"**1. The Central SoMa Plan Creates a Second Financial District at the Expense of Families, Youth and Seniors Living, Working and Going to School in SoMa**

"The area defined as the Central SoMa Plan Area is a neighborhood. While we are not opposed to further growth, we are opposed to Planning's proposed transformation of this neighborhood into a new Financial District. The scale of development and the mix of commercial, office and high end luxury development described in the Plan are not conducive to a healthy neighborhood.

"There are many established aspects to what constitutes a healthy neighborhood that the DEIR should be studied against. We demand that this DEIR be studied against the City's Healthy Development Measurement Tool (HDMT), which was developed by Planning in partnership with the Department of Public Health and community organizations during the Eastern Neighborhoods rezoning[1]. Please refer to the Eastern Neighborhoods Community Health Impact Assessment (ENCHIA)[2,3]

"Youth, families and seniors in SoMa demand a family-friendly neighborhood, human scale, safety for pedestrians of all ages and abilities, with access to light and air, and neighborhood services close by. The Plan as proposed is completely out of character with the goal of sustaining Central SoMa as a neighborhood and a dynamic employment center co-existing in a mutually supportive way. Instead of building towards the long-established community and City goal of creating a family-friendly neighborhood in Central SoMa, the DEIR proposes a second Financial District, which will harm the health of existing and future populations."

Footnotes:

[1] http://www.who.int/hia/conference/poster_bhatia_2.pdf

[2] http://www.pewtrusts.org/en/multimedia/data-visualizations/2015/hia-map/state/california/eastern-neighborhoods-community

[3] http://www.pewtrusts.org/~/media/assets/2007/09/hiareportenchia.pdf?la=en

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.3])

"What stands out from the CSP and its DEIR is that the Department claims it wants a family-friendly San Francisco, but that it doesn't really mean it - won't do what it takes to make that happen in real life. Actions - or lack thereof - speak for themselves, far louder than words." *(John Elberling, San Franciscans for Reasonable Growth, Letter, February 13, 2017 [O-YBNC-Elberling.4])*

Response PM-1

The comments generally express dissatisfaction with the Plan. One commenter expresses an opinion about the mix of use districts that constitutes the Plan's overall land use program. The comments also include a request that the Draft EIR be studied against the City's Healthy Development Measurement Tool (HDMT), developed by the Planning Department in partnership with the Department of Public Health and community organizations. In addition, commenters express a desire for the Plan to be more family-friendly with a focus on a healthy neighborhood. See Response AL-1 on p. RTC-274 for a discussion of a family-friendly alternative.

At the request of the Planning Department, the Department of Public Health in 2013 performed an analysis of the 2013 draft Plan with its update to the HDMT. The resulting Sustainable Communities Health Assessment[123] made the following findings with respect to physical environmental conditions:

- The Plan Area has far fewer trees per acre than the citywide average; however, implementation of the Plan would result in an increase in the number of trees per acre;
- The Plan Area has little open space; however, implementation of the Plan would be expected to "substantially increase the amount of publicly accessible open space in the Plan Area";
- The vast majority of the Plan Area is covered by impervious surface, resulting in relatively high volumes of stormwater runoff; however, implementation of the Plan should result in a decrease in stormwater runoff;
- The Plan Area has some of the poorest air quality in San Francisco, with up to 16 percent of households exposed to poor air quality; however, with implementation of the Plan, the number of new housing units whose residents are exposed to poor air quality would not increase, because new housing developed in the Plan Area would be protected by enhanced filtration required by San Francisco Health Code Article 38;
- Traffic noise is high in the Plan Area; however, existing citywide requirements would result in lower interior noise levels in new development, compared to existing buildings, and the Plan's proposed streetscape improvements would help improve overall noise levels, compared to conditions without these improvements;

[123] San Francisco Department of Public Health, "Sustainable Communities Index and the Central Corridor Draft Plan, April 11, 2013, http://default.sfplanning.org/Citywide/Central_Corridor/Central_Corridor_HDMT_Report_and_Response.pdf," accessed June 16, 2017.

- The number of pedestrian injuries and fatalities per 100 road miles in the Plan Area is considerably higher than the citywide average; however, implementation of the Plan "is expected to substantially improve pedestrian safety in the Plan Area";
- Bicycle safety is also poor in the Plan Area; implementation of the Plan would improve bicycle safety but would also increase bicycle ridership, which "could increase the amount of incidents between vehicles and bicycles"; and
- Traffic density in the Plan Area is "among the highest in the City due to the large arterials that carry traffic to and from freeways"; however, implementation of the Plan would "reduce traffic density as it increases travel through other modes."

The conclusions of the Department of Public Health analysis are generally consistent with the findings of the Draft EIR.

In addition to physical environmental conditions, the Department of Public Health evaluation also evaluated the draft Plan with respect to social and economic conditions, including crime, health facilities, school performance, housing affordability and safety, and unemployment. These issues, while of major importance to the community, are not subject to review under CEQA.

The issues raised by the commenters address the merits of the Plan and do not address the adequacy or accuracy of the environmental analysis provided in the Draft EIR, because the HDMT provides an analysis separate from that required under CEQA and the Draft EIR fully analyzed environmental effects related to noise, air quality, traffic, pedestrian and bicycle safety, and stormwater runoff. Therefore, no further response is necessary. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PM-2: Support for the Plan

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

A-BART.1
O-SFBC.2
I-Hong.1
I-Zhang.1

"On behalf of the San Francisco Bay Area Rapid Transit District (BART), we wanted to provide comments on the Draft Environmental Impact Report (DEIR) for the Central SoMa Plan. BART has been an active participant in the planning process and appreciates this opportunity to continue to provide feedback.

"In June 2016, the BART Board of Directors adopted our updated Transit-Oriented Development (TOD) Policy, which promotes high quality, more intensive development at, or near, BART stations. Given the planned land use growth and transportation improvements in the Central SoMa Plan Area, BART supports this vision for growth and investment, which aligns with our TOD Policy.

"The Central SoMa Plan would enable the development of up to 50,000 jobs and 7,500 housing units and result in significant funding for public benefits for more affordable housing, and transit and complete streets investments.

"The DEIR anticipates that this growth will stretch BART's ability to comfortably accommodate more customers on our trains and at Powell St. Station. The City recognizes the key role BART plays in serving local and regional residents and workers, and has been working with BART to develop a funding strategy to support future upgrades and capacity projects in the Station Modernization Plans for Powell, Montgomery and Civic Center Stations. These projects include a new elevator, new fare gates, lighting upgrades at Powell, as well as traction power facilities at Civic Center and Montgomery Stations to support our Core Capacity Program serving Market Street. The funding strategy also includes planning and design for long term transit capacity improvements.

"In June 2016, BART also adopted our updated Station Access Policy, which seeks to enable riders to get to and from stations safely, comfortably, affordably, and cost-effectively. In particular, the policy seeks to expand the share of riders walking, biking, and taking transit to the BART stations in order to more sustainably accommodate the growing demand for access to the BART system. Sustainable and seamless access is also reflected in the BART Strategic Plan Framework vision statement: "BART supports a sustainable and prosperous Bay Area by connecting communities with seamless mobility." These policy goals are supported by many elements of the proposed plan, and BART looks forward to working with the City in implementing projects that support these goals.

"BART is very appreciative of the level of involvement and discussions with the City since the inception of the planning process and is looking forward to our ongoing collaboration with the City of San Francisco on this important project. Thank you for your review and consideration of our comments in this letter. If you have any questions, please contact me at 510.287.4794 or at VMenott@bart.gov." *(Val Joseph Menotti, San Francisco Bay Area Rapid Transit District, Letter, February 14, 2017 [A-BART.1])*

"For the reasons above, the SF Bicycle Coalition wholly supports the bicycle elements outlined in the Central SoMa Plan and believes that strong transportation improvements will lay the groundwork for a thriving SoMa." *(Janice Li, San Francisco Bicycle Coalition, Letter, February 14, 2017 [O-SFBC.2])*

"I am writing in **full support of this project**. I believe this Document / Plan will help guide developers and planners alike thru this area of the City. Mostly to sort have a Master Plan that shows how all these Area Plans work with each other. My name is Dennis Hong, I have been a resident and a private citizen residing in San Francisco all my life – Sixty years-plus. Thank you for letting me review and comment on this Project and several others in the past. It's always a pleasure reviewing and commenting on the Departments professional EIR's. The Planning Department has been very supportive with my requests and I appreciate all the professional efforts that are made in producing these documents. OK, let's see if this email works. After reviewing this report (above), here are my following comments which are due today at 5PM and trust I did not miss the deadline to submit my comments and that my email format works. I have concluded there is sufficient information and I fully support this Project/Plan and this report. Each project has its own values and comments, this one is more unique that a typical DEIR." *(Dennis Hong, Email, February 13, 2017 [I-Hong.1])*

"I support the Central Soma Plan in its current form and hope to see them materialize. A shortage of housing is hurting San Francisco." *(Jingzhou Zhang, E-Comment, December 16, 2016 [I-Zhang.1])*

Response PM-2

The comments generally express support for the Plan. The comments do not raise any specific issues relating to the adequacy, accuracy, or completeness of the Draft EIR that necessitate a specific response. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment PM-3: Jobs-Housing Balance—Plan Area

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

A-CPC-Richards.1

"So as I listen to at the comments and I look at the Plan, I, too, like Mr. Schwark, kind of scratch my head and go, we have 63,600 employment growth, and the housing -- I guess dwelling units -- I think it's square footage, but when I read the plan, it was 7,000 dwelling units. That's a huge imbalance.

"And I'm not sure -- are we exacerbating an already difficult situation? I don't know. And I looked at the -- I started doing some calculations around the project alternatives, and Mr. -- the attorney for the folks in South of Market who spoke first, Drury, he had some compelling things around the percentages of what you're going to be able to achieve with the low-rise alternative, et cetera.

"But when you actually do the ratios, the imbalance, it's actually the same across them all. So it's just how much more -- how much -- it's a larger number, but it's the same imbalance." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.1])*

Response PM-3

The comments express concern over the jobs-housing ratio of new development that would be implemented under the Plan and do not concern the adequacy or accuracy of the environmental analysis in the Draft EIR. See Response OC-2, p. RTC-258, for further discussion of jobs-housing ratios.

Comment PM-4: Plan Will Adversely Affect Central SoMa Neighborhood

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

O-CSN-1.42

"What is clear, despite the vastly different and changing Project descriptions throughout the Project record, is that the Project is expected to bring up to 63,600 jobs and up to 7,500 housing units to the Central SOMA Neighborhood over the next 25 years, doubling the employment population and tripling the resident population.[2] What is clear, is the Project will seriously exacerbate the Project area's and City's severe jobs-housing imbalance; an imbalance made worse by the fact that San Francisco now serves as a "bedroom community" for the Peninsula cities and San Jose.[3] What is clear is the Project's myriad community benefits are not certain and even if certain, will not offset the impacts of the Project. What is also clear is that the Project calls for extending the Financial District type High Rise development to the neighborhood -- not limited just to the sites adjacent to transit centers and hubs – resulting in significant impacts including traffic congestion, shadows, declining air quality and displacement, among other impacts. Many of Project's stated goals[4] and anticipated results[5] are laudatory. However, the Project lacks the necessary policies, provisions and land use and designations to ensure those goals and results are in fact the outcome of adoption of the Project.[6]

"At stake is one of the most diverse and vital neighborhoods in San Francisco. It is at the Area Plan stage that CEQA requirements fulfilled correctly can have the best result. Deferring further analysis and mitigation to project by project evaluation simply does not work for issues such as Plan Consistency, Population and Housing and Public Services, where it is at the planning stage appropriate and feasible mitigation must be made certain.

"The DEIR's flaws are described in detail below. It is important to note here that the Project (Area Plan) is also flawed. As described the Plan as proposed departs from clear City policy, and although this Plan will guide development for 25 years until 2040, it fails to recognize rapidly changing times or present policy direction to deal with changes.[7] Examples of omissions in the Plan include but are not limited to the rapid increase in UBER, LYFT and other ride sharing services that have swamped our roads and provided an alternative to transit, the loss of families due to spiraling costs of housing and competition from high wage sectors, rapid increase in high wage jobs displacing existing jobs but also creating demand for services including a dramatic rise in delivery services and related fulfillment centers. In addition, the Plan does not take into consideration leading edge substantive policy solutions emerging from City Hall such as a required mix of housing units with a fixed minimum percent family "sized." Within the plans 25-year horizon, the City will also see self-driving cars and other vehicles. Some of these changes – including the advent of self-driving cars – could accelerate the reduction in land needed for vehicles and parking. These are but a few of the changes that have been occurring and are accelerating that must be addressed in the Area Plan. The City should pause both to revise the DEIR and to re-engage the public and experts and get this plan right."

Footnotes:

[2] Assuming population figures provided in the DEIR, the Project would triple the resident population of 12,000 to 37,500; possibly quadruple as resident population may be closer to 10,000. The Project would more than double the employment in the area from a current level of approximately 45,600 jobs to 109,200 jobs. DEIR at page IV-6 and IV-5.

[3] Between 2000 and 20016, San Francisco reportedly added 88,000 new jobs and only 37,000 new housing units, many of which were not suited for families or accessible to the local workforce due to high prices and rents. Mayor's Office of Housing. During the same period, San Francisco has experienced an increase in high wage residents who commute daily to the Peninsula cities and Silicon Valley, furthering increasing the gap in San Francisco housing available to the local workforce.

[4] increase capacity for jobs and housing, maintain diversity of residents, prioritize walking, biking and transit, offer abundance of parks and recreational opportunities, preserve the neighborhoods cultural heritage, ensure new buildings enhance the character of the neighborhood. Central SOMA Plan at page 6.

[5] 33 percent of total units produced after the Plan adoption are affordable, no net loss of PDR, space for services, cultural preservation, etc. Central SOMA Plan at page 7.

[6] Such as reducing heights except adjacent to major transit hubs, certainty for production of affordable housing in the neighborhood prior to, or concurrent with job growth (policy link for certain number of housing units before jobs), certainty for more than one significant new park, emergency access improvements in place rather than deferred to a future street design, and the like.
[7] For example, substantive policy changes by the Board of Supervisors are taking aim at ensuring the City is for all families – "Family Friendly SF." Between 2005 and 2015, 61 percent of the 23,200 new units of market rate housing were studios and one bedrooms. SF Planning Department. The proposed Central SOMA Plan does not include policies with a required unit mix. A revised Plan that will purportedly guide growth until 2040 should start out being leading edge and a family friendly goal and implementing policies would be an essential component of that revised Plan.

(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.42])

Response PM-4

The comment generally addresses the Plan and its merits and provide a discussion of how the Plan could adversely affect the Central SoMa neighborhood. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

The comment also addresses differences between the project descriptions presented in the Initial Study and Draft EIR; addresses jobs-housing "imbalance" (ratios); contends that the Draft EIR defers mitigation for impacts related to Plan consistency, population and housing, and public services; and asks about the Plan's adaptability to future conditions including ridesharing services, autonomous vehicles, and displacement. The commenter also incorrectly notes that the Plan would result in significant shadow impacts. See Table RTC-6, Significant and Unavoidable Impacts for the Central SoMa Plan, in Response AL-1 for a complete list of all of the significant and unavoidable impacts identified in the Draft EIR.

Differences between the project descriptions presented in the Initial Study and the Draft EIR as referred to by the commenter are addressed in Response PD-7, p. RTC-77. Additionally, Response OC-2, p. RTC-258, discusses jobs-housing ratios. These responses address the commenter's concerns about Plan consistency. The comment does not provide any substantive evidence that mitigation related to Plan consistency, population and housing, and public services has been deferred. Impacts related to population and housing and public services were found to be less than significant in the Initial Study. According to CEQA Guidelines Section 15126.4(a), "mitigation measures are not required for effects which are not found to be significant." The comments related to the Plan's adaptability to future conditions pertaining to ridesharing is discussed in Response TR-7, p. RTC-151, and displacement is addressed in Response OC-1, p. RTC-248. With regard to the comment about autonomous vehicles, analyzing impacts associated with such vehicles would be speculative, and CEQA does not require analysis of speculative impacts (CEQA Guidelines Section 15145). As such, revisions to the Draft EIR to address these comments are not required.

Comment PM-5: Youth and Family Zone Special Use District

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

O-SOMCAN-Cabande.4
O-VEC.3

"**2. The Central SoMa Plan Disregards the SoMa Youth and Family Special Use District**

"The Central SoMa Plan incorporates areas that are covered under the *SoMa Youth and Family Special Use District*[4] was adopted by the Board of Supervisors in January 2009. The *SoMa Youth and Family Special Use District*'s purpose is to expand the stock of affordable housing, as well as protect and enhance the health and environment of youth and families in So Ma. The Central SoMa Plan does not adequately take into account the *SoMa Youth and Family Special Use District* and instead of strengthening its controls, the DEIR undermines its goals.

"We demand that as part of the Central So Ma Plan, projects within the *SoMa Youth and Family Special Use District* are required to undergo review and approval by resident groups and community organizations before they are considered by the Planning Department. We are demanding that this community approval process function similarly to other Special Use Districts in the City such as the *Bernal Heights Special Use District*.[5]

"Planning has abused the *SoMa Youth and Family Special Use District* since it was established during the Eastern Neighborhood rezoning. These abuses including the re-mapping of the *SoMa Youth and Family Special Use District* by the Hearst and Forest City's 5M development, which covers five city blocks near 5th and Mission Streets. The 5M project gained approval in December 2015 for a large office tower by re-mapping the boundaries of the *SoMa Youth and Family Special Use District* with justifications by the Planning Department that this Special Use District does not have strong controls. SOMCAN, along with several other community-based organizations, have been demanding strong controls since before 2009 for the *SoMa Youth and Family Special Use District* so we can protect youth, families and seniors in the neighborhood. Planning has ignored our calls to strengthen this *SoMa Youth and Family Special Use District* through the Central SoMa rezoning process. The Central SoMa Plan must be revised to address this deficiency.

"The environmental impact of displacement is clear and further criticized in our point #5 below. As long as Planning continues to promote the displacement of youth, families and seniors from Central SoMa in favor of large scale office and luxury housing developments, there will be an increasing and compounding environmental impact which has not been studied or reported in the DEIR. We demand that Planning revises the Central SoMa Plan in partnership with the community to strengthen the controls of the *SoMa Youth and Family Special Use District* in order to stabilize and grow our economically and racially diverse community."

Footnotes:

[4] http://sf-planning.org/sites/default/files/FileCenter/Documents/1479-SoMa_YFZ_SUD_Legislation.pdf.

[5] http://masonkirby.com/wpb/wp-content/uploads/2010/03/nwbhdrb_infopacket.pdf.

(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.4])

"It is stated that the current 'plan proposes no change to the SoMa Youth and Family Zone SUD' (IV.A-7). The Planning Department should consider the expansion of the Youth and Family Zone SUD especially to support the efforts of community organizations and the SoMa Stabilization Fund to stabilize the families that live in the district. Bessie Carmichael/Filipino Education Center was ranked number 5 in the 'most dangerous elementary school zones in California' according to study derived from data from the CA Highway Patrol SWITRS & California Department of Education. Additionally, according to Hamilton Family Services, 116 of 640 students at Bessie Carmichael (K-8) are homeless (2014). Conditional use authorization is essential in creating a safe and livable environment for these youth and families. We are also looking to expand the district to include seniors as we have many SRO's and senior housing within the plan. While the Plan stresses housing and jobs, we are

also requesting that the Central SoMa Plan support these efforts to expand the SUD for existing and future youth, families, and seniors." *(Chris Durazo, Bill Sorro Housing Program Veterans Equity Center, Letter, February 13, 2017 [O-VEC.3])*

Response PM-5

The comments include a recommendation that the Planning Department consider an expansion of the SoMa Youth and Family Special Use District (SUD) within the Plan Area to support efforts to stabilize the families that live in the district and to potentially improve conditions at places, such as the Bessie Carmichael/Filipino Education Center, as well as conditions in general for youth, families, and seniors. The comments also request that individual projects within the Plan Area be required to undergo review and approval by resident groups and community organizations before they are considered by the Planning Department. The comments further request that the Planning Department revise the Plan to strengthen the controls of the SoMa Youth and Family SUD. As discussed and shown in Draft EIR Figure II-2, Existing Plan Area Use Districts, p. II-9, the SoMa Youth and Family SUD overlays part of the western portion of the Plan Area, and also extends outside of the Plan Area. The intent of the SoMa Youth and Family SUD, which was adopted in 2008 as part of the Eastern Neighborhoods Area Plans and Rezoning, is to expand the provision of affordable housing within its boundaries. The SoMa Youth and Family SUD also requires conditional use authorization for several uses, including bars and liquor stores, restaurants, religious facilities, various entertainment uses, and parking. As discussed in the Draft EIR, the Plan proposes no change to the SoMa Youth and Family Zone SUD and the controls would remain in place with implementation of the Plan. These comments pertain to the merits of the Plan and do not address the adequacy or accuracy of the environmental analysis in the Draft EIR. The comments will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Regarding comments that express concern about socioeconomic issues and displacement, see Response OC-1, p. RTC-248.

Comment PM-6: Restrictions on Building Market-Rate Housing

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

I-Cerles.1

"There are too many restrictions on building market-rate housing. The only way that San Francisco will lose the distinction of having the highest rents in the country is if we allow market-rate housing to be built unabated. However, this plan seems to ignore that fact and makes developers jump through hoops, as well as increases the cost of building homes, a cost which the developers then pass on to renters in the form of higher rent. The Planning Department, which has 'planned' to make sure San Francisco has the highest cost of living in the country, is truly doing a disservice to all the native San Franciscans who cannot qualify for affordable housing but cannot afford the highest rents in the country. Shameful." *(Marty Cerles Jr., E-Comment, December 16, 2016 [I-Cerles.1])*

Response PM-6

The comment addresses the merits of the Plan and does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

D.18 General Comments

The comments and corresponding responses in this section cover general topics in the Draft EIR. Some of these topics are general in nature and related to the analysis in the Draft EIR, other comments are not related to the analysis contained in the Draft EIR. These include topics related to:

- Comment GC-1: Success of Other Area Plans in Achieving Stated Goals
- Comment GC-2: CEQA Baseline
- Comment GC-3: CEQA Process
- Comment GC-4: Cut-and-Cover Construction
- Comment GC-5: Adequacy of Draft EIR Analysis and Mitigation
- Comment GC-6: Individual Project Analysis
- Comment GC-7: Legislative Processes
- Comment GC-8: Lower-Rise Construction Could Lower Cost of Development and Thereby Provide Lower-Income Housing
- Comment GC-9: Name a Privately Owned Public Open Space (POPOS) After Jack Kerouac
- Comment GC-10: Pace of Change
- Comment GC-11: Plan Impacts on Seniors
- Comment GC-12: Timing of the Central SoMa Plan
- Comment GC-13: Non-Traditional Housing/Short-Term Rentals
- Comment GC-14: South of Market Area (SoMa) Distances

Comment GC-1: Success of Other Area Plans in Achieving Stated Goals

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

I-Hestor-1.10

"**Project Objectives 11-5.** In light of previous planning efforts, please discuss how successful the various rezonings have been in attaining their stated objectives. Specifically in regard to stabilizing and expanding residential communities (Youth and Family Zone in EN). Expanding commercial work space for artists in post Downtown Plan south of Market zoning. Expanding transit routes (including on 2-way Folsom PLUS new Muni lines in south of Market). Stabilizing jobs and services in Eastern Neighborhoods and Western So Ma Plans while maintaining housing for wide range of incomes." *(Sue C. Hestor, Letter, February 13, 2017 [*I-Hestor-1.10*])*

Response GC-1

The comment does not address the adequacy or accuracy of the Draft EIR; rather, the comment addresses information concerning the implementation of other area plans adopted by the City. For information, the Planning Department publishes regular updates regarding implementation of its various planning efforts. These monitoring reports provide updates on the amount of commercial and residential development that has been constructed during the reporting period, as well as the pipeline of commercial and residential development. These reports are available at http://sf-planning.org/implementing-our-community-plans. The following reports may be specifically relevant to the information requested in the comment: the Eastern Neighborhoods Monitoring Report 2011–2015, the East SoMa Plan Monitoring Report 2011–2015, the Western SoMa Plan Monitoring Report 2011–2015, and the Market and Octavia 2015 Five-Year Plan Monitoring Report. The following is summarized from the Planning Department's Eastern Neighborhoods Monitoring Reports 2011–2015:[124]

- Affordable housing constituted 12 percent of all new housing constructed in the five Eastern Neighborhoods (including Western SoMa) from 2011 to 2015;
- As of June 2016, approximately 740,000 square feet of PDR space has been lost in the Eastern Neighborhoods since adoption of the Eastern Neighborhood plans, and another 614,000 square feet could be lost to projects in the development pipeline; the total of 1.35 million square feet would represent about 35 percent of the mean of the estimated loss of PDR space forecast in the Eastern Neighborhoods EIR; and
- Development fees collected from projects in the Eastern Neighborhoods total about $50 million to date, for use in improving housing, transportation and transit, complete streets, recreation and open space, and child care.

Additionally, the Planning Department annually updates both its Commerce and Industry Inventory and its Housing Inventory, both of which provide snapshots of current activity, the Department also publishes annual reports for each of the neighborhoods governed by recently adopted area plans, along with an annual report by the Interagency Plan Implementation Committee (IPIC) regarding capital improvements in all plan areas, including Balboa Park, Visitacion Valley, Rincon Hill, Transit Center, Market and Octavia, and Eastern Neighborhoods; the most recent IPIC report was published in January 2017.[125]

Regarding transit service, the Planning Department does not provide transit service, which is the responsibility of the SFMTA. SFMTA's Muni Forward program (formerly the Transit Effectiveness Project) includes a number of service enhancements in the Plan Area, as described on Draft EIR p. IV.D-6, including increased frequency on the 8AX/8BX lines and 30/30X lines, rerouting of and increased frequency on the 10 Townsend line (although it will continue to operate on Second Street adjacent to the Plan Area), institution of a new 11 Downtown Connector line (replacing the 12 Folsom-Pacific line in the Plan Area).

Regarding Folsom Street, the Draft EIR evaluated potential changes to Folsom and Howard streets, including one-way and two-way options, both of which would see transit, pedestrian, and bicycle improvements.

[124] San Francisco Planning Department, Eastern Neighborhoods Monitoring Reports 2011–2015, undated, *http://sf-planning.org/implementing-our-community-plans*, accessed June 16, 2017.
[125] San Francisco Planning Department, Interagency Plan Implementation Committee, Annual Report, January 2017, *http://default.sfplanning.org/plans-and-programs/plan-implementation/2017_IPIC_Report_FINAL.pdf*, accessed August 5, 2017.

Concerning the SoMa Youth and Family Special Use District (SUD), as stated on Draft EIR p. IV.A-7, this district:

> … overlays part of the western portion of the Plan Area (see Figure II-2, Existing Plan Area Use Districts), generally bounded by Howard, Fourth, and Harrison Streets, and extending to the west outside of the Plan Area to just beyond Seventh Street. This SUD was adopted as part of the planning for the Eastern Neighborhoods Area Plans and Rezoning project in 2008. It is intended to expand the provision of affordable housing, and to that end allows for dedication of land to the City and County of San Francisco (the City) by a developer, for use as a site for affordable housing, in lieu of the developer paying a fee or providing affordable housing. The SoMa Youth and Family SUD also requires Conditional Use authorization for several uses, including bars and liquor stores, restaurants, religious facilities, various entertainment uses, and parking. The Plan proposes no change to the SoMa Youth and Family Zone SUD.

The SoMa Youth and Family SUD (Planning Code Section 249.40A) will remain in effect regardless of action to implement the Central SoMa Plan.

Comment GC-2: CEQA Baseline

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

O-CSN-1.8
O-CSN-1.10
O-CSN-1.16
O-CSN-1.21
O-CSN-1.44
O-CSN-1.56
O-CSN-1.61
I-Margarita.1

"**IV. THE DEIR INCLUDES AN INADEQUATE BASELINE.**

"The DEIR fails to adequately describe baseline conditions in the Plan area. In several areas there is no baseline analysis at all. In others, the baseline data is far out of date, from 2010. 2010 data is inherently unrepresentative since the City and nation was in the midst of the worst recession since the great depression. Therefore, using 2010 baseline data will inherently bias the entire DEIR analysis.

"Every CEQA document must start from a "baseline" assumption. The CEQA "baseline" is the set of environmental conditions against which to compare a project's anticipated impacts. *Communities for a Better Environment v. So Coast Air Qual. Mgmnt. Dist.* (2010) 48 Cal. 4th 310, 321. CEQA Guidelines Section 15125(a) (14 C.C.R., § 15125(a)) states in pertinent part that a lead agency's environmental review under CEQA:

> "…must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time [environmental analysis] is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant."

"(See, *Save Our Peninsula Committee v. County of Monterey* (2001) 87 Cal.App.4th 99, 124-125 ('*Save Our Peninsula*.') As the court of appeal has explained, 'the impacts of the project must be measured against the "real conditions on the ground."' (*Save Our Peninsula*, 87 Cal.App.4th 99, 121-123.) As the court has explained, using such a skewed baseline 'mislead(s) the public' and 'draws a red herring across the path of public input.' (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711.)

"SoMa is among the most ethnically and economically diverse neighborhoods in the City. The neighborhood is home to 15% of the City's minority and women owned businesses, and 8% of the City's green businesses, which is significant given that the area makes up only 1% of the City's land area.[4] The neighborhood has a slightly higher level of racial diversity than the City as a whole, with about 60% of the population being people of color.[5] Although the median household income is slightly higher than the City average, the neighborhood also has one of the highest levels poverty with 31% of the population living at or below 200% of the poverty threshold.[6]

"The neighborhood faces extreme environmental challenges. As the San Francisco Department of Public Health (DPH) stated in a 2012 report:

> due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality in the City, with 13% of households living in an area exposed to greater than 10ug/m3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million.[7]

"Asthma and chronic obstructive pulmonary disease hospitalizations are approximately twice as high in Central SoMa as in the rest of the City.[8]

"The neighborhood has one of the highest incidences of pedestrian injuries in the City. As DPH stated, 'The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8).'[9] The neighborhood also faces 'amongst the highest violent and property crime rates in the City. During that time period, the number of assaults per 1,000 residents was 210 in the plan area and 44 for the City as a whole. Likewise, the property crime rate was 900 in the Plan area and 177 for the whole City.'[10]

"Finally, the neighborhood faces a severe lack of open space and parks. The same DPH report stated:

> Public infrastructure areas that the Plan area performs more poorly in include public health facilities and parks and open space. The Recreational Area Access Score assesses relative access to park acreage at any point in the City. Here again the Plan area was one of the lowest performers. Currently 67% of residents live within 1/2 mile of a public recreational facility compared to 91% for the City as a whole. Additionally, only 16% of residents are within 1/4 mile of a community garden compared to 26% across the City.[11]

"Thus, while Central SoMa is a robust, ethnically and economically diverse community, it also faces serious challenges in terms of a lack of open space, high levels of pollution, pedestrian safety and extreme traffic congestion. Solving these problems is the key to making the neighborhood livable and family friendly. Very little of this critical baseline information is included in the DEIR, making the document inadequate as a public information document.

"Urban Planner Terrell Watt, AICP, explains that the DEIR's baseline data is out of date in many respects, for population, jobs-housing balance, public services and other impacts. (Watt Comment pp. 7-8)."

Footnotes:

[4] San Francisco Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 6 (Nov. 30, 2012) (Exhibit F).

[5] Id. p. 21.

[6] Id. p. 3.

[7] Id. p. 3.

[8] Id. p. 22.

[9] Id. p. 3.

[10] Id. p. 4.

[11] Id. p. 4.

*(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.8*])*

"**4. Initial Study and DEIR Use Out-of-Date Baseline Data.**

"Also, the 2014 Initial Study uses out-of-date baseline data. Population, housing, traffic and other data used for the baseline analysis in the Initial Study was taken in 2010. Of course, 2010 was the height of the last recession. As a result, much of this data does not represent actual current baseline conditions, in which traffic, population, air pollution, and other impacts are all much higher. CEQA requires that the baseline reflect actual current conditions on the ground, not an unrepresentative time period, such as the greatest recession since the great depression. *Communities for a Better Environment v. So Coast Air Qual. Mgmnt. Dist*. (2010) 48 Cal. 4th 310, 321; *Save Our Peninsula Committee v. County of Monterey* (2001) 87 Cal.App.4th 99, 124-125 ('*Save Our Peninsula*.') As the court of appeal has explained, "the impacts of the project must be measured against the "real conditions on the ground."' *Save Our Peninsula*, 87 Cal.App.4th 99, 121-123. As the court has explained, using such a skewed baseline 'mislead(s) the public' and 'draws a red herring across the path of public input.' *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708- 711.

"Urban Planner Terrell Watt, AICP, explains that baseline data for employment, housing, population, public services, jobs-housing balance, and many other factors are either absent or out of date." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.10*])*

"**3. The Traffic Analysis Uses an Improper Baseline.**

"As discussed above, CEQA requires the agency to use a baseline that represents real conditions on the ground at the time of CEQA review. Mr. Smith concludes that the DEIR fails to use a representative traffic baseline. The DEIR relies on traffic baseline data from 2011 and earlier. This data reflects a recessionary period. It does not reflect much higher traffic currently found in the area." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.16*])*

"**1. Air Quality Baseline Analysis is Inadequate.**

"First the air quality analysis cannot be adequate if it uses an erroneous baseline. *CBE v. SCAQMD, supra*. The DEIR fails to disclose that the San Francisco Department of Public Health has determined Plan area has among the worst air quality in the City, due primarily to extreme traffic congestion. An SFDPH 2012 report states:

> due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality in the City, with 13% of households living in an area exposed to greater than 10ug/m3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million.[15]

"Asthma and chronic obstructive pulmonary disease hospitalizations are approximately twice as high in Central SoMa as in the rest of the City.[16] Almost the entire Plan area is in an Air Pollution Exposure Zone (APEZ), meaning that airborne cancer risks exceed 100 per million. (DEIR, Figure IV.F-1). Without this critical baseline information, the DEIR analysis is meaningless. *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (Cal. App. 4th Dist. 2013) ('Without a reasonable determination of the expected attendance at Hoover evening football games on completion of the Project, District may be unable to adequately compare the baseline attendance to expected attendance in determining whether there is a fair argument the Project may have a significant impact on traffic and/or parking.n22 (Guidelines, §§ 15125, subd. (a), 15126.2, subd. (a); *Communities*, at p. 320 & fn. 5.)')

"In *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d at 718, the court concluded that an EIR inadequately considered an air pollution (ozone) cumulative impact. The court said: 'The [ ] EIR concludes the project's contributions to ozone levels in the area would be immeasurable and, therefore, insignificant because the [cogeneration] plant would emit relatively minor amounts of [ozone] precursors compared to the total volume of [ozone] precursors emitted in Kings County. The EIR's analysis uses the magnitude of the current ozone problem in the air basin in order to trivialize the project's impact.' The court concluded: 'The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but ***whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin***.' (Emphasis added). The Kings County case was reaffirmed in *Communities for a Better Environment v. Cal. Res. Agency*, 103 Cal.App.4th at 116, where the court rejected cases with a narrower construction of 'cumulative impacts.'

"As in Kings County, given the already extreme air pollution problems facing the Plan area, the Project's air quality impacts are even more significant."

Footnotes:
[15] Id. p. 3.
[16] Id. p. 22.

*(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.21*])*

"**2. The DEIR Includes an Inadequate Baseline**

"The DEIR fails to adequately describe baseline conditions in the Plan Area, including information about the Project area and regional setting. Setting or environmental baseline information is as essential to adequately disclosing and analyzing project-related and cumulative impacts as a complete and consistent Project

description. Without adequate and complete information about the setting, it is not possible to determine whether the Project improves or makes worse existing environmental conditions.

"Examples of regional baseline setting information that is missing from the DEIR includes but is not limited to the following.

"a. Affordable, Workforce and Family Friendly Housing

"The DEIR must analyze the potential for the Project to displace existing housing, create demand for additional housing and displace people requiring construction of replacement housing elsewhere. To perform this analysis, it is essential the DEIR include in the description of the Project baseline (setting) details concerning existing affordable units, including deed restricted housing, family housing, senior housing and housing affordable to the workforce[10] in the Project area. Information concerning affordable housing in the Project area is incomplete, consisting only of the following:

> 'The Plan area contains approximately 7,800 residential units, approximately 6,800 households, and a population of approximately 12,000 people, according to Planning Department data. This accounts for just two percent of the City's total number of households. According to the Plan, South of Market and the Plan area in particular, are home to a large amount of deed restricted affordable housing; about 15 percent of the housing is deed-restricted for low income residents, compared to 4.5 percent citywide.' DEIR Appendix B, Initial Study at page 78.

"Without current and complete information about the existing housing stock in the Project Area, the DEIR cannot adequately analyze the Project's impact on affordable, workforce, senior and family friendly housing and households and conclusions concerning the significance of Project-related and cumulative impacts cannot be supported by facts and evidence. The DEIR must be revised to include this and other baseline information.

"b. Existing Jobs-Housing Balance and Fit with the Project Area, City and Region

"The DEIR must analyze the potential for the Project to make worse the existing imbalance of jobs and housing in the Project area as well as the City and region. Finding the right jobs-housing balance has long been an important concern for urban planners and an important policy consideration for general and area plans. More recently, attention has turned to jobs-housing fit – the extent to which housing price and rent is well matched to local job salary and quality. Both the Initial Study and DEIR are silent on the matter of jobs housing fit and fail to adequately address the issue of jobs housing balance. The DEIR should be revised to describe the existing job-housing balance and fit for the Project area, adjacent planning areas, the City and region. Updated baseline information must include a description of changes in demand for housing in San Francisco due to the choice by Peninsula and Silicon Valley employees to reside in San Francisco and relevant to the DEIR's analysis, how this change is increasing housing costs, increasing competitive for scarce housing stock and displacing existing residents. This information is not only necessary to adequately analyze environmental topics such as displacement and Project demand for new housing, but it is also essential to determining the extent to which the Project will increase commuting, traffic and vehicle miles traveled. Therefore, without this information, the full impacts associated with air quality and greenhouse gas emissions, among other impacts cannot be adequately analyzed and conclusions concerning the significance of Project-relation and cumulative impacts cannot be supported by facts and evidence. The DEIR must be revised to include this and other baseline information.

"c. Public Services

"The DEIR must analyze the Project's impacts on a wide array of essential public services, including but not limited to fire, police, emergency, health-care, child-care as well as schools. Neither the DEIR nor the Initial Study contain the information needed to support an adequate analysis of the Project's impacts to public services. Information about public services is out of date and incomplete. For example, the scant information on police and fire services dates back to 2012 and 2013, and lacks any information about the City's service standards, existing capacity and unmet needs. See DEIR Appendix B, Initial Study at pages 118 and 119. A great deal has changed in a very few years since the incomplete baseline information on services was presented in the Initial Study due to rapid growth in the City post-recession that has not been accounted for in the Initial Study setting information concerning services. The DEIR must be revised to include this and other baseline information. Without this information, adequate analysis of the Project's impacts is impossible and conclusions concerning impact significance cannot be supported by facts and evidence."

Footnote:

[10] Workforce housing is housing at the lower end of market rate serving households with up to 200% of median income and often referred to as the "missing middle" or gap in affordable housing in San Francisco. Voters recently approved funding to build more housing, including for the SF workforce.

*(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.44*])*

"***Use of Outdated Baseline Data***

"According to the Bay Area Air Quality Management District's (BAAQMD) CEQA Air Quality Guidelines,[1] and as stated in the DEIR,

> "The significance thresholds for assessment of a planning document, such as the proposed Plan, involve an evaluation of whether:
>
> - The plan would be consistent with the control measures contained in the current regional air quality plan (the 2010 Clean Air Plan), would support the primary objectives of that plan and would not hinder implementation of that plan; the plan's growth in vehicle miles traveled (VMT) do not exceed the plan's population growth; and the plan would not cause localized CO impacts.
>
> If the foregoing questions can be answered in the affirmative, the proposed Plan would not:
>
> - Conflict with or obstruct implementation of the applicable air quality plan;
> - Violate any air quality standard or contribute substantially to an existing or projected air quality violation; nor
> - Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)" (p. IV.F-21, IV.F-22).

"Using these thresholds, the DEIR concludes that because 'the Plan would be consistent with the control measures contained in the current regional air quality plan (the 2010 Clean Air Plan), would support the primary objectives of the 2010 Clean Air Plan and would not hinder implementation of the 2010 Clean Air Plan,' and because 'the rate of growth in VMT with implementation of the Plan would not exceed the Plan's rate of population growth and the Plan would not cause localized CO impacts,' 'the Plan would not violate an air

quality standard or contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any non-attainment criteria pollutant' (p. IV.F-34).

"This conclusion, however, is incorrect, as the DEIR's air quality analysis is based on outdated baseline data that do not accurately reflect current traffic, air quality, pedestrian safety, and population within the Plan area. For example, the DEIR conducts an analysis to determine whether or not the rate of growth in vehicle miles traveled (VMT) with implementation of the Plan would exceed the Plan's rate of population growth. This analysis, however, relies upon outdated 2010 baseline data, which is more than five years old. The DEIR states,

> 'Growth projections prepared by the San Francisco Planning Department (and discussed under Analysis Assumptions in the Overview subsection of Chapter IV, Environmental Setting, Impacts, and Mitigation Measures) indicate that with implementation of the Plan, Plan Area residential population would increase from approximately 12,000 in 2010 to 37,500, by 2040, the analysis horizon year. This represents an increase of 213 percent. Additionally, employment is projected to grow from about 45,600 under existing conditions to approximately 109,200 by 2040, an increase of 139 percent. The combined population-employment ("service population") increase with implementation of the Plan, would therefore be approximately 154 percent ([37,500 + 109,200] ÷ [12,000 + 45,600] = 2.54, or an increase of 154 percent from existing). Based on output from the County Transportation Authority travel demand model, daily VMT to and from the Plan Area would increase by approximately 77 percent by 2040, from approximately 987,000 to about 1.751 million' (p. IV.F-33).

"The use of 2010 population and traffic projections to determine the Plan's incremental net increase in criteria air pollutants is inadequate, as it does not accurately represent the current baseline conditions within the Plan area. As stated by the BAAQMD in their 2009 Justification Report, the use of outdated population growth estimates can result in inconsistencies within a Plan's air quality analysis.[2] Therefore, by relying upon baseline data that is more than five years old, the Plan's air quality impact is inadequately evaluated.

"Not only does the DEIR rely upon outdated traffic and population projections to determine the Plan's air quality impact, but it also fails to consider recent changes in the Plan area's air quality and pedestrian safety. According to the Sustainable Communities Health Assessment conducted for the proposed Plan, 'due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality in the City, with 13% of households living in an area exposed to greater than 10 μg/m3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million' (p. 2). The report continues on to state that while 'residents in the Plan area own fewer cars, drive less, and spend more time walking and cycling,' the area still has 'among the highest densities of traffic in the city' (p. 3). The report also indicates that the Plan area's current pedestrian injuries and traffic congestion are among the highest in the city, stating,

> 'The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8). Compared to other neighborhoods, the Plan area also has a higher proportion of drivers who are driving over the speed limit. While more residents who live in the Plan area may not be driving themselves, the traffic density, a general proxy for adverse environmental exposures and health hazards from traffic, is among the highest in the City due to the large arterials that carry traffic to and from freeways. Additionally, 100% of the current population in the plan area lives within 150 meters of a designated truck route (research suggests that the concentration of emitted motor vehicle pollutants may be highest within 150 meters of roadways)' (p. 3).

"As you can see in the excerpt above, the Plan area's current air quality, traffic conditions, and pedestrian safety are among the worst in the city – something that the DEIR fails to address or even consider when evaluating the Plan's air quality impact. Once implemented, the Central SoMa Plan, which proposes to develop 17,280,000 square feet of residential uses, 10,430,000 square feet of office uses, and 4,007,000 square feet of retail and other uses, will only exacerbate these already significant health and environmental issues (Table VI-1, p. VI-3, pp. 627). Therefore, we find the DEIR's conclusion of a less than significant air quality impact to be incorrect, and maintain that the Plan would have a significant air quality impact, as our analysis provides substantial evidence to support this significance determination."

Footnotes:

[1] Air Quality Guidelines, BAAQMD, June 2010. Available at http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/draft_baaqmd_ceqa_guidelines_may_2010_final.pdf?la=en, p. 9-2.

[2] Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance, BAAQMD, 2009. Available at http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en.

*(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.56*])*

"**The Transit Analysis is Based on Data Not Representative of Current Conditions**

"The DEIR's transit impact analysis relative to the capacity of the transit operations serving the area are reported on DEIR Tables IV.D-8, IV.D-9, IV.D-10, IV.D-18, IV.D-19 and IV.D-20, respectively on DEIR pages IV.D-45, IV.D-46, IV.D-48, IV.D-90, IV.D-92- IV.D-94. By footnotes, the Tables are said to be based on the San Francisco Planning Department's Memorandum, Transit Data for Transportation Impact Studies, dated May 2015. However, if the referenced DEIR tables are compared to the ones in the subject SF Planning Department memo (actually dated May 15, 2015), the following things become evident:

- The tables are reformated to facilitate comparison of the existing ridership and capacity utilization condition to that when the added ridership of the Project is combined with the existing ridership - an entirely legitimate act.
- The existing ridership numbers are modified to correct very small addition errors in the transference of individual SF MUNI line counts to the screen line totals on the tables or addition errors on the tables themselves - again entirely legitimate.
- In tables IV.D-9 and IV.D-19, the SF MUNI data is reconfigured into screen lines that make more sense with respect to the Project area - again a legitimate action.
- The 2040 cumulative ridership data (the 2040 No Project data) in the DEIR is apparently compiled from a later run of San Francisco's travel model than that in the cited Planning Department memo - a legitimate act but one that should have been mentioned in the DEIR.
- The DEIR consultants actually updated the existing conditions ridership data for one regional transit service provider, BART, in 2016 -a legitimate and commendable action.
- The DEIR tables fail to reproduce footnotes on the original existing conditions tables from the cited SF Planning Department memo that indicate the actual collection date of the data and fail to enter footnotes that convey data dates indicated in the text of the cited memo - a misleading act that conceals the outdated nature of some of the existing conditions data.

"In fact, the cited San Francisco Planning Department memo makes clear that the SF MUNI data was collected in the Fall of 2013. Data on the ridership on the regional transit service providers is sourced by footnote to a secondary source document produced by SFMTA in 2012. Ridership collected by the actual regional transit service providers obviously predates that document and is most likely collected in 2011 or earlier. Given the extent of changes affecting transit ridership demand that have taken place in San Francisco and the region since 2011 and 2013, no reasonable person can argue that the data employed in the transit ridership versus capacity impact analysis is representative of existing conditions." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [*O-CSN-1.61*])*

"Good afternoon. As a long time -- my name is Margarita, and I live at 631 Folsom Street.

"As a longtime resident of Central SoMa, I have many issues with the version of the Central SoMa Plan released last summer and the Draft EIR released last December.

"First and foremost, I want to emphasize that Central SoMa is a neighborhood and a community, not a drive-through corridor. And I'm very thankful that the Area Plan was renamed to reflect that.

"Central SoMa is a wonderful and thriving mixed-use neighborhood, with beautiful historic buildings, diverse population, as well as easy access to transit, the Downtown, and the AT&T Park.

"Central SoMa also faces many challenges. The area has some of the worse air quality in San Francisco. There is a lack of parks and public spaces, and many parts of the area are severely underutilized. The sidewalks are narrow and the pedestrian experience often grim.

"The area is intersected by the constant hum of a perpetually packed elevated highway. And the highway on-ramps spill over cars to surrounding streets for many hours of the day, bringing traffic to a standstill. The automobile constantly threatens pedestrians. The loud honking of frustrated drivers is a persistent reminder that the City has failed to take action." *(Margarita,*[126] *Hearing Transcript, January 26, 2017 [*I-Margarita.1*])*

Response GC-2

Some of these comments, about baseline data used in the Draft EIR, address the following issues:

- The comments state that the Draft EIR fails to accurately characterize existing (baseline) conditions in the Plan Area with respect to employment, housing (including affordability), population (including residential diversity), jobs-housing balance, transportation (including pedestrian safety), noise, air quality, open space, public services, and crime, and that baseline data in the Draft EIR and the Initial Study is out of date, rendering the analyses inadequate.

Comments concerning existing crime, diversity of the Plan Area population, the affordability and/or suitability of Plan Area housing for seniors/families, and providing adequate childcare and healthcare facilities, will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan. While these comments raise valid concerns of importance to the Plan Area, the comments refer to social and/or economic issues that are not germane to CEQA, and are not required to be analyzed in an EIR. Accordingly, these issues

[126] Margarita did not provide her last name during the hearing.

are not discussed further. Specifically, with respect to displacement and housing affordability, see Response OC-1, p. RTC-248. In general, socioeconomic effects are beyond the scope of the CEQA environmental review process unless a link can be established between anticipated socioeconomic effects of a proposed action and adverse physical environmental impacts (CEQA Guidelines Section 15131(a), CEQA Section 21082.2). As explained in Response OC-1, there is no evidence showing that new residential development in San Francisco is the cause of displacement of existing residents or is resulting in environmental effects. Moreover, research indicates that new housing production does not result in increased costs of the existing housing base, but instead helps stabilize existing home prices and rents and suppresses price appreciation. Additionally, Response PH-3, p. RTC-321, explains why the Plan would not displace a substantial number of existing housing units or people and Response PS-1, p. RTC-332, addresses concerns regarding child care in the Plan Area.

Timeliness of Baseline Data

The comment that the Draft EIR fails to adequately disclose existing conditions with respect to employment, housing, population, jobs-housing balance, transportation (including traffic and pedestrian safety), noise, air quality, open space, and public services, is incorrect. CEQA Guidelines Section 15125 states that the environmental setting of an EIR should describe conditions that exist at the time that a NOP is published (or, where no NOP is issued, at the time that environmental analysis commences). The NOP for the Central SoMa EIR was published in April 2013. Concerning population, housing, and employment, the Draft EIR presents 2010 data as a baseline condition because, at the time of NOP publication, 2010 census data was current, given the time lag that occurs in publication of census data. For example, while the initial congressional redistricting population data from the 2010 census was released in early 2011, more detailed data concerning population housing characteristics, including, for example, the population and number of housing units in the Plan Area, was not released until later in 2011 and 2012. Although the Census Bureau issues annual American Community Survey estimates based on survey data, information from the 2010 census remains the most current decennial census data and the current set of complete (i.e., non-survey-based) population, housing, and employment counts. Likewise, the employment data compiled by the Planning Department on the basis of 2010 Dun & Bradstreet data was also the most currently available as of publication of the NOP. Furthermore, regional population and employment growth projections from the Association of Bay Area Governments (ABAG) are made only for five-year intervals. The Planning Department's Land Use Allocation, which was the basis for the transportation modeling undertaken for the Draft EIR, was based on ABAG growth projections from 2010 to 2040, as set forth in ABAG's *Projections 2013* (based on forecasts prepared in 2012 for the development of *Plan Bay Area*). This was likewise the most recent set of forecasts at the time the NOP was published and the environmental analysis commenced. Therefore, the Draft EIR appropriately used data compiled in 2010 as the baseline for its growth forecasts and analyzed growth-related impacts over the 2010–2040 period. Regarding jobs-housing balance, see Response OC-2, p. RTC-258, which discusses the utility of jobs-housing balance as a measure.

Modeling of Existing (Baseline) Conditions

Concerning transportation, noise, and air quality, as explained in Draft EIR Section IV.D, Transportation and Circulation, the analysis of transportation impacts (e.g., transit capacity and transit delay, pedestrian level of service, bicycle conditions) is based on counted travel volumes and observed conditions as of 2013, as noted on Draft EIR p. IV.D-4, consistent with the CEQA direction that the baseline reflect conditions at the time of NOP

publication. To ensure that the quantitative analysis of transportation impacts was conservative, the entirety of the Plan's projected growth increment between 2010 and 2040 was added to this 2013 baseline, meaning that the analysis captures growth that had occurred up to publication of the NOP in 2013. This same quantitative analysis was then relied upon in the quantification of traffic noise impacts. Traffic-generated air quality health impacts were modeled based on output from the San Francisco County Transportation Authority's SF-CHAMP travel demand model run in 2012; this was the most current SF-CHAMP model run as of the 2013 NOP publication. This SF-CHAMP model output, as noted, was based on ABAG Projections 2013, the regional projections associated with Plan Bay Area. Although MTC and ABAG in July 2017 approved Plan Bay Area 2040, as of the writing of this RTC document, ABAG has yet to issue updated regional growth projections by census tract (what will be issued in 2018 as Projections 2017), which is the data necessary for the San Francisco County Transportation Authority to update the SF-CHAMP model to incorporate updated regional growth forecasts. Therefore, the forecast data relied upon in the Draft EIR remains current.

The 2012 existing condition in the SF-CHAMP model effectively means that the model output was conservative in that, as described above, it added the entire 2010–2040 growth increment to Year 2012 conditions, which are assumed to have been somewhat more congested than 2010 conditions. Additionally, certain available data were updated subsequent to NOP publication, during preparation of the Initial Study and the Draft EIR (as noted by one commenter, BART ridership information was updated shortly before publication of the Draft EIR; also, additional pedestrian counts were taken in 2014), when that information became known. Therefore, it is clear that the Draft EIR's quantitative analyses account for existing conditions as of the date of NOP publication.

In the six below-listed tables, the Draft EIR correctly cites a May 2015 Planning Department memorandum to transportation consultants as the source of the transit ridership data. To clarify the date that the transit ridership data in the Planning Department memorandum was obtained, the sources of these six tables are revised as follows (new text is double underlined, and deleted text is shown in ~~strikethrough~~):

- Table IV.D-8, Muni Downtown Screenlines – Weekday AM and PM Peak Hours - Existing and Existing plus Plan Conditions, p. IV.D-45:

  SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); ~~,~~ Fehr & Peers, 2016.

- Table IV.D-9, Central SoMa Cordons—Weekday AM and PM Peak Hours—Existing and Existing plus Plan Conditions, p. IV.D-46:

  SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); ~~,~~ Fehr & Peers, 2016.

- Table IV.D-10, Regional Transit Screenlines—Weekday AM and PM Peak Hours—Existing and Existing plus Plan Conditions, p. IV.D-48:

  SOURCES: SF Planning Department Memoranda, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2012 regional transit ridership data), and *Updated BART Regional Screenlines*, October 2016~~,~~; Fehr & Peers, 2016.

- Table IV.D-18, Muni Downtown Screenlines—Weekday AM and PM Peak Hours—2040 Cumulative Conditions, p. IV.D-90:

  SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); ~~,~~ Fehr & Peers, 2016.

- Table IV.D-19, Central SoMa Cordons—Weekday AM and PM Peak Hours—2040 Cumulative Conditions, p. IV.D-92:

  SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); Fehr & Peers, 2016.

- Table IV.D-20, Regional Transit Screenlines—Weekday AM and PM Peak Hours—2040 Cumulative Conditions, p. IV.D-94:

  SOURCES: SF Planning Department Memoranda, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2012 regional transit ridership data), and *Updated BART Regional Screenlines*, October 2016; Fehr & Peers, 2016.

Transportation

Concerning transit, the Draft EIR used baseline transit data from 2013, as noted on Draft EIR p. IV.D-4, which was the most currently available data as of the date of NOP publication, and the transportation modeling output from the SF-CHAMP model remains current because MTC has not yet released updated data based on *Plan Bay Area (2040)*. As also noted above, and by the commenter, the Draft EIR did incorporate updated BART ridership data as of 2016 to present more current data where available. Existing transit capacity utilization is discussed beginning on Draft EIR p. IV.D-4 and shown in Draft EIR Table IV.D-8, Muni Downtown Screenlines – Weekday AM and PM Peak Hours - Existing and Existing plus Plan Conditions, p. IV.D-45, and Table IV.D-9, Central SoMa Cordons—Weekday AM and PM Peak Hours—Existing and Existing plus Plan Conditions, p. IV.D-46. Existing pedestrian conditions are discussed beginning on Draft EIR p. IV.D-9, which states, among other things, that many Plan Area sidewalks are narrower than recommended in the City's *Better Streets Plan*. Regarding pedestrian safety, Draft EIR pp. IV.D-9 through IV.D-12 identifies a number of deficiencies in pedestrian facilities that, along with the large number of seniors living in the vicinity of Moscone Center (described on p. IV.D-13), result in existing pedestrian conditions that are more hazardous than in most parts of San Francisco. The Draft EIR then analyzes pedestrian safety impacts taking into consideration the baseline conditions in the Plan Area, beginning on p. IV.D-56. For a more detailed response, also see Response TR-9, p. RTC-167.

Concerning traffic, Draft EIR p. IV.D-21 explains that the Planning Commission, in March 2016, voted to replace evaluation of traffic congestion, based on vehicle delay as measured by intersection level of service analysis, with evaluation of vehicle miles traveled (VMT). Accordingly, traffic congestion and intersection delay are no longer considered in the evaluation of a project's significant impacts under CEQA in San Francisco. See Response TR-3, p. RTC-139, and Response TR-6, p. RTC-149, for additional discussion of VMT and traffic impacts.

Air Quality

Concerning air quality, the comments allege that the Draft EIR's VMT analysis is faulty because it relies on the change in VMT and population from 2010 to 2040. The Draft EIR's analysis of VMT is based on the 2012 output of the SF-CHAMP travel demand model. As explained above, this was the most current SF-CHAMP model run as of the 2013 NOP publication and, therefore, properly represents the Draft EIR's existing, or baseline, condition. The commenter has not provided any information to suggest that the VMT-based air quality analysis would have identified a new significant impact had different assumptions been employed. Moreover, for the reasons noted here, the Draft EIR's assumptions were reasonable.

Regarding existing air quality conditions, the Draft EIR fully describes the existing setting, including existing cancer risk and concentration of fine particulate matter (PM2.5), beginning on p. IV.F-9. The Draft EIR first explains the potential cancer risk and other health effects of toxic air contaminant (TAC) emissions, including PM2.5 and diesel particulate matter, and then describes how San Francisco partnered with the BAAQMD to evaluate air pollution and exposures from mobile, stationary, and area sources in the city, identifying areas with poor existing air quality, including areas near freeways. These areas are identified as the APEZ. As explained on p. IV.F-10, "The majority of the Plan Area is located within the APEZ, primarily because of high traffic volumes on Plan Area streets. There are also a number of individual sources of TACs in the Plan Area, including diesel generators, gasoline stations, auto body repair shops, and other light industrial activities." Draft EIR pp. IV.F-12 through IV.F-15 go on to explain the role of heavy traffic volumes in creating poor air quality and, on p. IV.F-14, specifically calls out a number of streets in the Plan Area and vicinity with volumes in excess of 10,000 vehicles per day, which, the Draft EIR states, BAAQMD guidance indicates can adversely affect sensitive receptors, including nearby residents. See Response AQ-2, p. RTC-208, for additional discussion of the APEZ and air quality impacts.

The modeling to identify the APEZ was undertaken in 2012 and relied upon the same data used by the Department of Public Health in its Sustainable Communities Health Assessment that is cited by one commenter. As explained on Draft EIR p. IV.F-9, the City (Planning Department and Department of Public Health) partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. This modeling, which led to designation of the APEZ, also serves as the basis for San Francisco Health Code Article 38, which, as amended in 2014, requires "enhanced ventilation," including filtration of outdoor air, for all new development in the APEZ that will include sensitive receptors (primarily residential units, but also uses such as childcare centers, schools, and nursing homes). As required under Article 38, updated air quality modeling is currently being undertaken to update the APEZ location; however, the results of this modeling are not yet available as of publication of this document. Therefore, the air quality setting presented in the Draft EIR properly includes the most current modeling data as of Draft EIR publication. Accordingly, the Draft EIR accurately characterizes existing air quality conditions in the Plan Area. It is noted that, due to improved emissions controls, traffic-generated emissions are anticipated to decrease over time. This is evidenced by comparison of Draft EIR Figure IV.F-2, Parcels Newly Added to Air Pollutant Exposure Zone with Plan Implementation, p. IV.F-47, and Figure IV.F-3, Parcels Newly Added to Air Pollutant Exposure Zone with Plan Implementation (2040), p. IV.F-56, which show that the same volume of project traffic results in a slightly smaller portion of the Plan Area being within the APEZ in 2040 than under Existing-plus-Project conditions.

Recreation

Regarding recreation, the Draft EIR and the Initial Study both clearly describe existing parks and other open spaces in the Plan Area. See, for example, Draft EIR p. II-31, "Like SoMa generally, the Central SoMa Plan Area has limited public open spaces and facilities"; the text goes on to list the open spaces in and near the Plan Area and continues, "The uneven distribution of these community assets leaves portions of the area underserved with open space." Existing parks and open spaces are mapped on Draft EIR Figure II-14, Existing and Proposed Parks, Open Space, and Recreational Facilities, p. II-32. Existing parks and open space are also discussed extensively in Draft EIR Section IV.H, Shadow, beginning on p. IV.H-2. Initial Study Section D.10, Recreation,

discusses existing parks on pp. 101–102. See Response RE-1, p. RTC-326, for additional discussion of impacts regarding recreational facilities and open space.

Public Services

Concerning public services, the Initial Study evaluated public services and determined that the Plan would not result in the need for new facilities, the construction of which could result in significant physical impacts, which is the question to be answered under CEQA. This is, in large part, because, as stated on Initial Study p. 121, should the Fire Department (or Police Department) determine that new facilities were required in the future, "any potentially adverse effects from new fire facilities would be similar to those anticipated by development under the Plan, such as noise, archeological impacts, air quality impacts such as emissions of dust and other pollutants, including diesel exhaust, and temporary street closures or other traffic obstructions." That is, construction of a new fire or police station would not result in new significant impacts not already analyzed; thus, the effects would already have been addressed in the Draft EIR. It is also noted that the Fire and Police departments recently (2015) opened a new Fire Station No. 4 and a relocated Southern Police Station in the new Public Safety Building in Mission Bay, about 0.5 mile south of the Plan Area. The relocated Southern Police Station serves the Plan Area, while Fire Station 4 serves the Plan Area on certain calls. Concerning the revisions to Plan Area growth forecasts subsequent to publication of the Initial Study, see Response PD-6, p. RTC-52, which explains that the increase in projected growth would not result in impacts beyond those disclosed in the Initial Study. See also Response PS-2, p. RTC-336, for additional discussion of impacts related to public services.

Comment GC-3: CEQA Process

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

O-CSN-1.11
O-SFHAC.1
O-SOMCAN-Cabande.1
O-SOMCAN-Cabande.2
O-SOMCAN-Cabande.20
O-SOMCAN-Cabande.23

"**5. City Staff Refused to Grant an Extension of the Comment Period Despite Massive Project Revisions and Two Federal Holidays.**

"Exacerbating this problem is the fact that for at least three years, City staff led the public to believe that the project was as described in the Initial Study. In particular, the 2013 Central Corridor plan document strongly favored the Mid-Rise Alternative over the High-Rise Alternative, and described a project extending all the way to Market Street. Then, just a week before the holidays, on December 14, 2016, the City released the DEIR for a short 60-day comment period, for the first time unveiling the very different Project in the DEIR. CEQA does not countenance such 'bait-and-switch' tactics which serve only to confuse and mislead the public and short-circuit the public process embodied in CEQA. 'An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR.' *County of Inyo v. City of Los Angeles* (1977), 71 Cal.App.3d 185 (rejecting

an EIR that changed the project description over the course of the CEQA review process). The City has done the opposite – radically changing the project description after years of processes and public meetings in which an entirely different project was presented to the public. Despite this sleight of hand, the City flatly refused any extension of the public comment period, despite admitting that the situation met all of the City's criteria for an extension, particularly given that the comment period fell over both the Christmas and New Year's holidays. The City's Environmental Review Officer responded to three separate requests for extension by stating:

> The Planning Department has identified a number of situations that may warrant longer public review periods, such as those including projects affecting multiple sites in various locations, or an area larger than a single site; or in situations where multiple federally recognized holidays occur within a DEIR's 45-day the public review period. Both situations apply to the Central SoMa Plan DEIR.

"(Letter from Lisa M. Gibson, San Francisco Environmental Review Officer (Feb. 3, 2017). Despite admitting that the criteria for an extension had been met, the City proceeded to reject the extension request.

"The City makes a mockery of CEQA and the public process. 'Public participation is an essential part of the CEQA process.' (CEQA Guidelines §15201). 'Environmental review derives its vitality from public participation.' (*Ocean View Estates Homeowners Assn. v. Montecito Water Dist*. (2004) 116 Cal.App.4th 396, 400). By dramatically altering the Project after years of public review, on the eve of the holiday season, and then refusing to extend the public comment period, the City 'mislead(s) the public' and 'draws a red herring across the path of public input.' *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.11])*

"Cory Smith on behalf of the 300 members of the San Francisco Housing Action Coalition. We're still going through the report with our members, getting a cohesive response to work with staff. I do have two comments though. We have had the opportunity to really be hands on with this for a long time. We've had multiple tours in Central Soma and really do appreciate the City's working with us and trying to make sure as much of this is open and available to the public as possible. My other comment is actually related to the Eastern Neighborhoods EIR and the conversation happening there.

And please, please, please let us avoid a duplicate situation where five years from now, ten years from now we're going to be looking over everything all over again.

"If we're going to take the time -- we spend a lot of time and a lot of money developing a cohesive plan, we need to be able to stick with it because I don't want to end up in this circular cycle where we are continuously coming up and questioning these things.

"If we can get everybody on the same page and get everybody's best interests in mind, I think we are better off. Thank you." *(Corey Smith, San Francisco Housing Action Coalition, Hearing Transcript, January 26, 2017 [O-SFHAC.1])*

"**Comment Period Extension Period Should Have Been Granted**

"Firstly, we object again on the grounds that there has been insufficient time for the public to review this nearly 700 page long technical document. We, along with other community members, submitted a letter dated February 3, 2017 requesting for an extension of the comment period, which Planning denied.

"Since 2000, SOMCAN has worked to educate and organize the community particularly around land use issues. With only 60 days from the release of the DEIR to the closing of the comment period, and the fact that the DEIR was released on December 14, 2016 just prior to the holidays, there has not been enough time for our organization to complete a thorough review, technical and otherwise, of the DEIR, as well as present the contents to community members, and compile their feedback. This a fatal flaw and fundamental deficiency of this DEIR that it has not sufficiently been available to the public for review and comment." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.1])*

"**A More Extensive and Thorough Public Review Needed of DEIR Given Relaxing of Project Level Reviews**

"This is not a project level EIR. This is a Plan Area EIR that comes to us in the new era of 'by-right' development encouraged at the State level (there is once again legislation pending at the State level to allow development 'by-right' without any project level environmental review or public hearings) and at our local level, with this Central SoMa Plan proposing a radical relaxing of development controls.

"In the past, Area Plans have been written with the presumption that more detailed environmental review will be done as projects are proposed by developers during the implementation of the Area Plans. This will almost certainly not be the case here, yet the public has not been allowed a reasonable time to review this DEIR and provide comment; and Planning has ignored the fact that the City is reducing the public's ability to comment on implementation of the Central SoMa Plan going forward.

"The following are SOMCAN's comments to the DEIR as we have best been able to compile them given the insufficient time Planning has afforded our organization to engage residents of SoMa in a thorough review and understanding of the contents of this DEIR." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.2])*

"**Conclusion: Preparation of the DEIR Did Not Sufficiently Allow for Public Input**" *(South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.20])*

"The preparation of this DEIR did not adequately allow for incorporation of community input. For example, the boundaries of the Central So Ma Plan changed significantly during 2016, and the public was not sufficiently noticed." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.23])*

Response GC-3

The comments object to the Planning Department not having extended the public review period for the Draft EIR and note that the Plan was revised substantially in 2016 from the draft Plan published in 2013. The comments also suggest that individual projects proposed in the Plan Area will not be required to undergo any additional environmental review.

The Draft EIR public review process is discussed on p. RTC-2 of this document. A typical Draft EIR public review period is from 30 to 45 days, and the state CEQA Guidelines stipulate that the public review period for a draft EIR shall not be longer than 60 days "except under unusual circumstances" (Section 15105). Administrative Code Section 31.14(b)(1) similarly requires public review of a Draft EIR for not more than 60 days "except under unusual circumstances." "Unusual circumstances" warranting extended review are not defined in the Administrative Code or in the CEQA Guidelines. However, in a December 2014 memo to the Planning Commission, the Planning Department Environmental Review Officer (ERO) explained that the Department's typical Draft EIR review period is 47 days, from a Wednesday publication date through the first weekday (Monday) following a 45-day term. Instances that may warrant a longer review period include a project affecting multiple sites in various locations or an area larger than a single site (e.g., an area plan, such as the Central SoMa Plan), a full-scope EIR for which no Initial Study was prepared, multiple federally recognized holidays during the review period, circumstances that could make it difficult to people to access or review the Draft EIR, and situations in which it is reasonable to alter the Draft EIR review period to coincide with another review period.[127]

In this case, consistent with the ERO direction noted above, the public review period for the Draft EIR was established at the time of Draft EIR publication as 60 days, rather than the typical 47 days, because of the large area covered in the analysis and to allow for public review during the holidays. The public review period was from December 14, 2016, through February 13, 2017. As required by Administrative Code Section 31.14(e), the Planning Commission held a public hearing to receive comments on the Draft EIR during the review period, on January 26, 2017. In accordance with Administrative Code Section 31.14(b)(1), either the Planning Commission or ERO may extend the comment period, "upon the request of an agency or person with special expertise from whom comments are sought." According to the 2014 ERO memo, an extension may be granted in the case of a substantial error in noticing or publication of the Draft EIR, the appearance during the public review period of important new issues, or should barriers to Draft EIR review become apparent. None of these conditions applied here. Therefore, no such extension was determined to be warranted.

Community outreach efforts shaped the Plan's scope and planning policies. Throughout the initial planning process, the Planning Department met with a range of community stakeholders, and involved City and regional agencies as part of the Plan's Technical Advisory Committee. The Planning Department held meetings with over 20 different stakeholder groups (including SOMCAN), facilitated multiple public meetings, made five informational presentations before the Planning Commission, led two walking tours, conducted a storefront charrette, conducted a print- and web-format survey, and provided an interactive informational website. This resulted in publication of a public review draft of what was known as the Central Corridor Plan in April 2013. Subsequently, the Planning Department conducted seven public workshops and open houses, held four more informational hearings before the Planning Commission, and published more than 20 policy papers exploring

[127] Sarah B. Jones, Environmental Review Officer, San Francisco Planning Department, Memo to the Planning Commission, "Length of Draft Environmental Impact Report Review Periods," December 11, 2014.

potential Plan revisions in 2014 and 2015 prior to issuing the revised Central SoMa Plan in August 2016. Thus, the revised Plan was available for public review four months prior to release of the Draft EIR. The Draft EIR's project description is based on the 2016 Plan released in August, but was modified to consider higher heights on certain parcels that would result in greater overall environmental effects than the 2016 Plan, which is generally consistent with similar heights incorporated in Option B studied in the Initial Study. Regarding the difference between the Initial Study project description and the Draft EIR project description, including the proposed height and bulk map, see Response PD-6, p. RTC-52.

With regard to whether or not individual projects proposed in the Plan Area would be required to undergo additional environmental review, as of the publication of the Draft EIR on December 14, 2016, Assembly Bill 73 (which passed September 29, 2017, and became effective on January 1, 2018) regarding Housing Sustainability Districts (HSD) (see p. RTC-7 for further discussion) did not exist and prior to then, subsequent development projects in the Plan Area would have been required undergo project-level CEQA review to determine whether or not they would result in significant environmental effects not disclosed in the Draft EIR. This subsequent environmental review process is described on Draft EIR p. IV-8. As discussed on p. RTC-7, it is possible that a portion of the Plan Area could be designated a HSD. If that were to occur, eligible projects would undergo a ministerial approval process and, therefore, would not be subject to environmental review. However, eligible projects would be required to incorporate applicable mitigation measures from this EIR.

A comprehensive overview of the Plan's public engagement process is summarized online at http://sf-planning.org/public-outreach-and-engagement.[128]

Comment GC-4: Cut-and-Cover Construction

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

I-Hestor-1.2

"Impacts that will spill over into the Central SoMa Plan Area from cut-and-cover construction methods on the soil, the structures, traffic intersections, sidewalks and businesses. I note that the area of most intensive proposed activity and increased height is just north of the Caltrain yard along Townsend St." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.2])*

Response GC-4

The comment refers to construction of the proposed Caltrain Downtown Extension, or DTX (which could also accommodate high-speed rail), which is proposed to occur along the south (Townsend Street) and east (Second Street) edges of the Plan Area. The DTX project is separate from the Central SoMa Plan, and is the subject of a Draft Supplemental EIR/Environmental Impact Statement published in December 2015 by the Transbay Joint Powers Authority, the Federal Transit Administration, and the Federal Railroad Administration. Specifically,

[128] San Francisco Planning Department, "Public Engagement and Outreach," The Central SoMa Plan website, http://sf-planning.org/public-outreach-and-engagement, accessed May 30, 2017.

the comment refers to "cut-and-cover" construction, which involves excavation from the surface down, as opposed to tunneling, which occurs entirely below grade. The Caltrain DTX would employ cut-and-cover construction through the existing Caltrain rail yard south of Townsend Street between Fourth and Sixth streets, as well as beneath Townsend Street between Third and Fourth streets, where construction would transition to tunneling. It is anticipated that effects of cut-and-cover construction would be similar to those of building construction described in the Draft EIR (e.g., some disruption of pedestrian, bicycle, transit, and auto/truck traffic, as well as air quality emissions and noise and vibration from construction equipment). In particular, construction in the block of Townsend Street between Third and Fourth streets would require lane closures, although some lanes would remain open except perhaps for limited periods. (This would be similar to ongoing construction of the Muni Central Subway in the South of Market neighborhood.) Each of these construction impacts is analyzed in the Draft EIR, which finds that construction-related transportation impacts (Impact TR-9) would be significant and unavoidable, even with mitigation, as would construction noise (Impact NO-2), although construction-related air quality impacts would be less than significant with mitigation. Therefore, the Caltrain DTX project would not result in any significant cumulative impacts in combination with development under the Plan not disclosed in the Draft EIR.

Comment GC-5: Adequacy of the Draft EIR Analysis and Mitigation Measures

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

O-CSN-1.6
O-CSN-1.13
O-CSN-1.38
O-CSN-1.40
O-CSN-1.45
O-CSN-1.53
O-CSN-1.54
O-SOMCAN-Cabande.21
O-SOMCAN-Cabande.25

"After reviewing the DEIR, together with our team of expert consultants, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the DEIR fails as an informational document and fails to impose feasible mitigation measures to reduce the Project's impacts. The Neighbors request the City address these shortcomings in a revised draft environmental impact report ('RDEIR') and recirculate the RDEIR prior to considering approval of the Project. The Neighbors have submitted expert comments from:

- Urban Planner Terrell Watt, AICP (Exhibit A);
- Environmental Scientists Matthew Hagemann, P.G., C. Hg., and Jessie Jaeger (Exhibit B);
- Traffic Engineer Daniel T. Smith, PE (Exhibit C), and
- Wildlife Biologist Shawn Smallwood, Ph.D. (Exhibit D).

"All of these experts conclude that the Plan has numerous impacts that are not adequately analyzed or mitigated in the DEIR. The expert comments are submitted herewith and incorporated by reference in their entirety. Each of the comments requires separate responses in the Final EIR. For these reasons, a revised DEIR should be prepared prior to Project approval to analyze all impacts and require implementation of all feasible mitigation measures." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.6])*

"At its core, CEQA requires the lead agency to identify all significant adverse impacts of a project and adopt all feasible mitigation measures or alternatives to reduce those impacts. 14 Cal. Code Regs. § 15002(a)(1). A prejudicial abuse of discretion occurs 'if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.' (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 722]; *Galante Vineyards v. Monterey Peninsula Water Management Dist*. (1997) 60 Cal. App. 4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946). The DEIR fails to meet these basic requirements." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.13])*

"**IX. A REVISED DRAFT EIR MUST BE PREPARED AND RECIRCULATED FOR PUBLIC COMMENT.**

"Recirculation of an EIR prior to certification is required 'when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (cf. Guidelines, § 15162, subd. (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (cf. Guidelines, § 15162, subd. (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt (cf. Guidelines, § 15162, subd. (a)(3)(B)(3), (4)); or (4) ***that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless***.' *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal. 4th 1112, 1130, citing *Mountain Lion Coalition v. Fish & Game Comm'n* (1989) 214 Cal.App.3d 1043.

"The DEIR is so fundamentally and basically inadequate, that recirculation of a new draft EIR will be required to allow the public to meaningfully review and comment on the proposed project." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.38])*

"After carefully reviewing the DEIR for the Project including its Appendices, proposed Central SOMA Plan, and relevant policy papers, and Financial Analysis, I have concluded the DEIR fails in numerous respects to comply with CEQA and to fulfill CEQA's fundamental mandate. As described below, the DEIR violates this law because it fails to analyze adequately the significant environmental impacts of the Project or propose sufficient mitigation measures in the form of Plan policies, provisions and land use designations to address those impacts. Where, as here, the EIR fails to fully and accurately inform decision makers and the public of the environmental consequences of proposed actions, it does not satisfy the basic goals of the statute. Because of the DEIR's numerous and serious inadequacies, the City of San Francisco must revise and recirculate the document to permit an adequate understanding of the environmental issues and potential solutions (mitigation and alternatives). Consideration should also be given to preparing a revised NOP and Initial Study prior to a revised DEIR because the 2014 Initial

Study is patently inadequate and describes a completely different project from the Plan set forth in the DEIR." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.40])*

"B. The DEIR's Analysis of, and Mitigation for, the Impacts of the Project Are Inadequate

"The discussion of a project's environmental impacts is at the core of an EIR. See CEQA Guidelines Section 15126(a). As explained below, the DEIR's analysis of the Project's environmental impacts are deficient under CEQA because the DEIR fails to provide the necessary facts and analysis to allow the City and the public to make informed decisions about the Project, mitigation measures and alternatives. An EIR must contain facts and analysis, not just bare conclusions. A conclusion regarding the significance of an environmental impact that is not based on analysis of the relevant facts fails to fulfill CEQA's information mandate.

"Additionally, an EIR must identify feasible mitigation measures to mitigate significant environmental impacts. CEQA Guidelines Section 15126.4. Under CEQA, 'public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . . .' Pub. Res. Code Section 21002.

"As explained below, the DEIR fails to provide decision makers and the public with detailed, accurate information about the full breadth of the Project's potentially significant impacts with respect to growth inducement, population and housing, shadows, parks and recreation, public services and plan consistency. The DEIR's cumulative analysis of these impacts is also deficient. Where the DEIR fails to adequately analyze the Project-related impacts, the cumulative analysis cannot be adequate. Further, the DEIR does not identify and analyze feasible mitigation measures that would reduce or avoid such impacts." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.45])*

"Decision makers and the public cannot possibly assess the Project's impacts through the present DEIR which is riddled with omissions, errors and inconsistencies. Among other fundamental deficiencies, the DEIR repeatedly understates the Project's significant environmental impacts and therefore fails to formulate feasible mitigation to reduce these impacts. To resolve these issues, the City must prepare a revised DEIR that would necessarily include substantial new information." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.53])*

"Our review concludes that the DEIR fails to adequately evaluate the Plan's impact on local and regional air quality, pedestrian safety, and traffic. As a result, air emissions and health impacts associated with construction and operation of the proposed Plan are underestimated and inadequately addressed. An updated DEIR should be prepared to adequately assess and mitigate these potential impacts." *(Richard Drury, Central SoMa Neighbors, S.F. Blu, Letter, February 13, 2017 [O-CSN-1.54])*

"The Central SoMa Plan DEIR is inadequate and should be revised with the additional suggested studies and recirculated to address the critical flaws we outlined above. *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.21])*

"As a public disclosure document, the Central SoMa DEIR is wholly insufficient and a new alternative should be studied that fully supports families and seniors in SoMa, and the DEIR should be recirculated for public input and review." *(Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.25])*

Response GC-5

The comments state that the Draft EIR is inadequate and should be revised and recirculated for public input and review. The comments present the commenters' general conclusions as to the adequacy of the Draft EIR. Specific comments on which these conclusions may be based are responded to elsewhere in this RTC document, under the relevant environmental topics. **Table RTC-6, Topics and Reference Points in the Initial Study, Draft EIR, and RTC**, lists the topics discussed and where those discussions occur in the Initial Study, the Draft EIR, and/or this RTC document.

TABLE RTC-6 TOPICS AND REFERENCE POINTS IN THE INITIAL STUDY, DRAFT EIR, AND RTC

Topic	Initial Study	Draft EIR	RTC
Change in 2013 Plan analyzed in the Initial Study and 2016 Plan in the Draft EIR		pp. V-5 and V-6	PD-6, p. RTC-52; OC-3, p. RTC-263
Discussion of impacts that could result from development allowed under the Plan with respect to shadow		p. IV.H-11	SH-1, p. RTC-229; SH-2, p. RTC-232
Analysis of population and housing, recreation, and public services	p. 77; p. 101; p. 118		PH-3, p. RTC-321; RE-1, p. RTC-326; RE-2, p. RTC-329; PS-1, p. RTC-332; PS-2, p. RTC-333
Identification of inconsistencies with plans and policies		Chapter III	PP-1 through PP-9, pp. RTC-88 through RTC-106
Analysis of air quality		Section IV.F	AQ-1, p. RTC-201
Analysis of traffic impacts and pedestrian safety		pp. IV.D-41 through IV.D-43; pp. IV.D-56 through IV.D-65	TR-6, p. RTC-149; TR-9, p. RTC-167

CEQA Guidelines Section 15151 contains the standards used to determine whether an EIR is adequate:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

The Draft EIR complies with the standards set in CEQA Guidelines Section 15151. Further, inadequacy of an EIR can be shown only when there has been a prejudicial abuse of discretion by the lead agency, either because the agency has not proceeded in the manner required by law or because the conclusions in the EIR are not supported by substantial evidence (CEQA Section 21168.5). None of the comments on the Draft EIR shows failure to follow the law or demonstrates that the EIR's conclusions are not based upon substantial evidence. Pursuant to CEQA Guidelines Section 15088.5, recirculation of a Draft EIR prior to certification is required only when "significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification." New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

"Significant new information" includes a disclosure showing that:

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

None of these conditions has been triggered. No significant new information as defined in CEQA Guidelines Section 15088.5, including new impacts or project alternatives, has been identified or added to the Draft EIR after publication of the Notice of Availability. The comments also state that a new alternative that supports families and seniors in SoMa is necessary, but the comments do not include further information describing a development scenario for such an alternative, or other evidence as to how such an alternative would reduce the significant and unavoidable impacts identified in the Draft EIR. See Response AL-1, p. RTC-274, for further discussion as to why a family-friendly alternative is not required to be analyzed in the Draft EIR. Therefore, information and analysis contained in the Draft EIR and this RTC document is adequate for the purposes of CEQA, and recirculation of the Draft EIR is not required.

Comment GC-6: Individual Project Analysis

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

O-One Vassar.8
O-One Vassar.9
O-Tishman.5

"**Page:** **Comment:**

"IV.D-68 Loading Impacts. Given the scope of development proposed for the One Vassar Project, the DEIR should acknowledge a need for flexibility in loading access along the south side of Harrison Street and Perry Street. The One Vassar Project may include a lay-by located on Harrison Street, just west of the Hawthorn crosswalks to serve as a drop-off for the residential building." *(Melinda A. Sarjapur, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.8])*

"**Page:** **Comment:**

"IV.H-38-39 Shadow on Plan-Proposed Open Spaces. The One Vassar Project is anticipated to include a 45'-wide pedestrian alley between its residential and hotel buildings which may constitute privately-accessible public open space. This section should reflect the potential development of this pedestrian alley and note that permitted development on adjacent parcels would necessarily result in significant shadow to this area." *(Melinda A. Sarjapur, One Vassar, LLC, Letter, February 13, 2017 [O-One Vassar.9])*

"**Page:** **Comment:**

"General The 598 Brannan Project will require on-site loading accessible from Welsh Street, due to the fact that such access is not desired along Brannan or 5th Streets. Current parallel parking spaces (and also perpendicular parking that is obstructing on the public right of way) utilized on Welsh will need to be eliminated in order to allow room for truck turning radius to and from the project's proposed loading access points and sidewalk widening along Welsh as proposed by the Central SoMa Plan. This should be acknowledged within the DEIR's discussion of parking and loading impacts for the area." *(Melinda A. Sarjapur, Tishman Speyer, Letter, February 13, 2017 [O-Tishman.5])*

Response GC-6

The comment requests that the Draft EIR describe project-specific impacts of the 598 Brannan Street project and the One Vassar project (also known as the 400 Second Street project). Both projects are included in the list of "Subsequent Development Projects" (Draft EIR p. IV-8) for which Environmental Evaluation Applications are on file with the Planning Department.[129] The level of detail in the project-specific CEQA review requested by the commenter is inappropriate for a program-level EIR. The Draft EIR analyzes the direct and indirect physical impacts of the Plan, which are primarily the changes in zoning heights and allowable land uses. As stated in the Draft EIR's discussion of Subsequent Development Projects on p. IV-8, "these projects are not considered in the cumulative analysis, but rather in the Plan analysis, as the proposed uses and intensity of development would be allowed under the Plan. It is important to note that *this EIR does not analyze the specific environmental impacts of these projects*. These projects would be subject to their own environmental evaluation …" [emphasis added]. As stated in the Draft EIR, no project-specific CEQA review of these projects is conducted in the Draft EIR; such analysis would be undertaken as part of project-specific CEQA review, as applicable. Accordingly, no revision of the Draft EIR is required.

Nevertheless, for information, it is noted that the Draft EIR finds significant loading impacts as a result of subsequent development projects (see Impact TR-6 on Draft EIR p. IV.D-68) and identifies mitigation measures that would apply to those projects. Thus, it is likely that Plan-level mitigation measures related to loading

[129] The One Vassar project is identified in the EIR by the address 400 Second Street, which is one of the parcels on that project site.

impacts would be required for those projects mentioned in the comments. With regards to shadow, the Draft EIR considers shadow impacts on existing open spaces because shadow analyses must consider whether shadow as a result of development under the Plan would affect the use or enjoyment of open space, which is not entirely possible to determine for undeveloped open spaces. For informational purposes, the Draft EIR provides an assessment of shadow on the Plan's proposed park on the block bounded by Bryant, Fourth, Brannan, and Fifth streets.

Comment GC-7: Legislative Processes

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

A-CPC-Johnson.2

"And I think there are a number of different types of community facilities. And even when you talk about how do we shape our communities to account for new services that are change the face of our cities, like shared housing, shared transit, you know, more delivery services, things like this -- those are all going to require zoning and code changes and building code changes. When everything dropped off by a drone from Amazon, we're going to require changes in our codes to create spaces for that.

"So I think it's a deeper discussion than just about what do we want to see. I think there's more mechanisms than just the zoning and the planning. There are actually law changes that we have to consider. Thanks." *(Christine Johnson, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Johnson.2])*

Response GC-7

The comment (made at the Draft EIR public hearing following a comment with respect to childcare facilities) notes that some services and facilities that may be desirable to the community could require legislative changes that extend beyond the jurisdiction of the Planning Commission and its jurisdiction over interpretation of the Planning Code and other planning policies. The comment does not address the adequacy or accuracy of the Draft EIR, and no changes to the Draft EIR are required.

Comment GC-8: Lower-Rise Construction Could Lower Cost of Development and Thereby Provide Lower-Income Housing

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

I-Hestor-1.23

"Developers have bid up the price of land counting on DRAMATIC increases in building heights. The cost of high-rise steel, pile- driven construction will drive up the cost of housing. Modest increases with appropriate

frame construction will allow lower income housing to be built. The Central So Ma Plan should not be predicated on maximizing developer profit and costs. The current plan for most of this area is the Western SoMa Plan.

"If the fill nature of the soils requires expensive types of construction, limiting those who can afford to build, reducing heights may very well enable less costly construction methods that will reduce the cost of housing construction." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.23])*

Response GC-8

The comment states that relatively higher development costs—driven, in part, by the cost of land, as well as by the cost of construction, including necessary foundation construction—may result in relatively higher housing costs. The comment notes that the cost that developers are willing to pay for land is influenced by the potential for greater development density that would be allowed under the Plan, particularly where taller buildings would be permitted. The comment does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to the decision makers for consideration in their deliberations on the proposed Plan.

Comment GC-9: Name a Privately Owned Public Open Space (POPOS) After Jack Kerouac

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

I-Goldstein.1

"Though not directly related to any impact of the plan, I think the city should either name or request that one of the POPOS in the area be named after Jack Kerouac. There are a number of locations in the city named for him, but I think one area that has escaped much notice in this respect is the area around the Caltrain Station. Kerouac worked as a brakeman for Southern Pacific on the trains that would eventually become Caltrain. Many locations in or around the planning area are explicitly mentioned in his poem 'October in the Railroad Earth.' The Bluxome St. Linear Park and suggested POPOS at 4th and Townsend seem ideal locations to name after Mr. Kerouac." *(Joshua Goldstein, E-Comment, January 1, 2017 [I-Goldstein.1])*

Response GC-9

The comment states that a POPOS should be named after American author Jack Kerouac and does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment GC-10: Pace of Change

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

A-CPC-Moore.1
A-CPC-Moore.4
A-CPC-Moore.5
A-CPC-Richards.7

"We are here to shape the document so that it's basically informing the decision makers. That's all it is.

"We want it to be comprehensive and shedding light on things which are contradictory for the last three or four years because many of the comments we hear -- and you know it best -- are similar comments that we have heard on individual projects, particularly in the Eastern Neighborhoods. And they are all loud and clear in the room.

"And the idea of public services, the balance of -- the housing-job balance, all of those are repetitive -- not repetitive but repeated comments that I think they're coming almost to a screeching intersects at this huge project, given that we're not talking about individual buildings but we are talking about the change of a larger quadrant of the city." *(Kathrin Moore, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Moore.1])*

"And what I'd like to also remind us of is that both in Rincon Hill, the special treatment of the 5M project, project, the special treatment of the Hub all, I think, affect how we look at this project.

"And I think we need to find a way to reflect and interweave the discussions on the broader discussion of the transformation of the city at large." *(Kathrin Moore, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Moore.4])*

"I'm raising a question that is almost impossible for you to address, Ms. Gibson, and that is the issue that we are living in a time of changing realities, where assumptions change and have significantly changed in the last three or four years. That is a comment by Ms. Hestor, by Mr. Drury and many others. How do we quantify that, and how do we bring it forward in something to inform decision makers what to do?" *(Kathrin Moore, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Moore.5])*

"So is that in your -- I have some questions around that. It's an interesting thing. I mean, the City needs to grow, I agree. But I think we need to balance the growth with the ability to actually have the housing and the transit and all the other support services keep up.

"We see what happened over in Potrero Hill. We keep hearing complaints about 16th Street. We don't have a bus line. We have a lot of cars jamming the streets. We [are] talking about doing even more over there. We're in that cycle where we start questioning whether the EIR made any sense because that was ten years ago; so much has changed in ten years. Maybe the 25-year Plan, given the acceleration to level of change, may not make much

sense anymore because -- you know." *(Dennis Richards, San Francisco Planning Commission, Hearing Transcript, January 26, 2017 [A-CPC-Richards.7])*

Response GC-10

The comments speak to apparent concern about the pace of change and development in San Francisco in recent years, including the perception that city services, including transit, may not be keeping up with growth in population and employment.

As discussed above in Response GC-2, p. RTC-375, concerning the baseline data on which the Draft EIR analyses are based, the data used in the Draft EIR are the most currently available at the time the analyses were undertaken. As also noted, the Draft EIR evaluates anticipated long-term growth within the Plan Area, although the pace at which that growth and change occurs can certainly be expected to vary over time. Given the strong economic conditions that have persisted for several years in much of the Bay Area, and especially in San Francisco, there is a perception among some residents and other observers that the current pace of change may be rapid. Specifically, regarding the transit analysis, the Draft EIR finds significant and unavoidable transit impacts on Muni and regional transit, as discussed on pp. IV.D-43 through IV.D-55. Decision makers may consider other information in their deliberations on the proposed Plan. For example, in June 2017, the San Francisco County Transportation Authority published a report on ride-sharing vehicles, which have been the subject of much discussion before the Planning Commission in recent years.[130] As another example, the Planning Department annually updates both its Commerce and Industry Inventory and its Housing Inventory, both of which provide snapshots of current activity. Likewise, the Department publishes an annual Downtown Plan Monitoring Report.[131] Additionally, the Department publishes annual reports for each of the neighborhoods governed by recently adopted area plans, along with an annual report by the IPIC regarding capital improvements in all plan areas, including Balboa Park, Visitacion Valley, Rincon Hill, Transit Center, Market and Octavia, and Eastern Neighborhoods. The most recent IPIC report was published in January 2017.[132]

Comment GC-11: Plan Does Not Address Impacts on Seniors

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

O-SDA.1

"Senior and Disability Action is an organization that mobilizes and educates seniors and people with disabilities to fight for individual rights and social justice. Through individual support and collective action, we work together to create a city and world in which seniors and people with disabilities can live well and safely.

[130] San Francisco County Transportation Authority, "TNCs Today: A Profile of San Francisco Transportation Network Company Activity," June 2017, http://www.sfcta.org/sites/default/files/content/Planning/TNCs/TNCs_Today_061317.pdf, accessed July 28, 2017.
[131] These reports are available at http://sf-planning.org/citywide-policy-reports-and-publications.
[132] San Francisco Planning Department, Interagency Plan Implementation Committee, Annual Report, January 2017, http://default.sfplanning.org/plans-and-programs/plan-implementation/2017_IPIC_Report_FINAL.pdf, accessed July 28, 2017.

"Our organization is submitting this comment letter in regards to the Central SoMa Plan Draft Environmental Impact report (IE: DEIR) which covers the South of Market Area—2nd Street, 6th street (East and west respectively), Townsend, Folsom, Howard and Stevenson Streets.

"We have concerns in regards to the scope of the plan and the impacts that it will have on seniors and those with disabilities in regards to traffic and open space. The EIR is 'Plan area' specific, not project level. With a proposal of this magnitude, we feel that the communities voice must not be shut out, that thorough public review must be accommodated.

"We are very concerned of the creating of a high rise district outside of the financial district. Many seniors and people with disabilities live in this area. What will be the impact on pedestrian safety? Many of our seniors have had close calls and some have had accidents that required extended hospital stays. Wind is a big concern. One of our members suffered a fall in a gust of wind, injuring her knees. And what of the impacts on housing stability of seniors and those with disabilities? What are the impacts of the influx of new community members?

"These concerns are very real to our organization and reflect the concerns of seniors and people with disabilities whom we serve. We feel that the DEIR is insufficient and urge that a new alternative be explored and conceived, with sufficient public input and discourse." *(Tony Robles, Senior and Disability Action, Letter, February 13, 2017 [O-SDA.1])*

Response GC-11

The commenters express concern about effects of the Plan on seniors and people with disabilities, particularly with respect to pedestrian safety, wind, and housing. Draft EIR p. IV.D-57 evaluates impacts of the Plan on pedestrians, in particular seniors and those with disabilities. Draft EIR pp. IV.E-9 and IV.F-14 also consider residential uses, including senior residences, to be sensitive receptors for purposes of noise and air quality analyses. As such, environmental impacts on seniors and persons with disabilities as a result of the Plan are addressed in the Draft EIR as appropriate under CEQA. For discussion regarding wind impacts of the Plan on seniors and persons with disabilities, see Response WI-8, p. RTC-223. See also Response PH-2, p. RTC-312, for further discussion of impacts of the Plan on seniors and persons with disabilities. For a discussion regarding the public input process for this Plan, see Response GC-3. Comments regarding housing specifically for seniors and disabled persons address social and/or economic impacts that are outside the purview of CEQA. See Response OC-1, p. RTC-248, for further discussion of gentrification and displacement. The commenter has not provided any evidence or information as to how the Plan could affect housing for seniors in a way that would result in a physical environmental impact; as such, no changes to the Draft EIR are required. The comments will be transmitted to City decision makers for their consideration in deliberations on the proposed Plan.

Comment GC-12: Timing of Central SoMa Plan

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

I-Hestor-1.8

"Based on the lengthy multi-year planning processes - particularly the lengthy time spent planning Western SoMa Plan which fine-tuned protections for existing residents AND JOBS - an observer might think that Planning was waiting for the Western SoMa planning process to END. So that it might be ripped to shreds and discarded after members of the public, who worked years on Eastern Neighborhoods then Western SoMa Plans, were burned out and went away. And another high-rise district, on bay fill, could be created to benefit developers of offices and market-rate housing." *(Sue C. Hestor, Letter, February 13, 2017 [I-Hestor-1.8])*

Response GC-12

The comment does not address the adequacy or accuracy of the Draft EIR. The comment will be transmitted to City decision makers for consideration in their deliberations on the proposed Plan.

Comment GC-13: Non-Traditional Housing/Short-Term Rentals

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

O-SOMCAN-Cabande.9

"**6. The DEIR Omits Analyses of the Current Trend of Residential Units Not Being Used as Traditional Housing**

"Cities across the US and even Canada are learning that developers are not producing housing units to be used for housing people. Many cities are now fully realizing the negative impacts of the push to 'build, build, build', an ideology fully embraced by this Central SoMa Plan. Footnoted here are examples of Vancouver[13] and New York City[14] that show that in world where real estate is solely developed as a commodity and home-sharing is corporatized, often new condos are not being occupied by local residents, or any people at all. Also footnoted is a map of vacant units in San Francisco indicating that many of our City's vacant units are in SoMa.[15]

"We are not opposed to building new housing, but we feel that it is environmentally important to ask the question, who are we building new housing for? Without adequate controls and enforcement in place:

- SRO's in SoMa will not continue to be used as open and accessible affordable housing options;
- new condos will be affordable only as high end luxury housing or sitting vacant because they are owned by investors who have no intention of living in these units;
- new condos will be used as commercial 'short term rentals' instead of as residential use;
- new condos will be used as 'corporate rentals' instead of as residential use; and
- other buildings will be used as 'student housing' instead of residential use.

"The inadequacy of the DEIR is that it studies the impacts of residential development as though it will be used for residences. The environmental impacts of corporate rentals, short term rentals and other commercial uses are different from residential uses. Without sufficient controls and enforcement, there is no way to ensure that new housing that is incentivized to be built under this new land use Plan will be used as housing."

Footnotes:
[13] http://www.theglobeandmail.com/real-estate/vancouver/dark-windows-illuminate-problems-in-vancouvers-real-estate-market/article31822833/
[14] https://www.nytimes.com/2015/02/08/nyregion/stream-of-foreign-wealth-flows-to-time-warner-condos.html
[15] http://www.antievictionmappingproject.net/vacant.html

(*Angelica Cabande, South of Market Community Action Network, Letter, February 13, 2017 [O-SOMCAN-Cabande.9])*

Response GC-13

The comment states that the Draft EIR does not consider impacts resulting from investor-owned properties or short-term or corporate rentals, and relays apparent concerns that new residential development allowed under the Plan could be used as short-term rentals as opposed to traditional residential uses. The land uses proposed in the Plan encourage a mix of uses, including residential, office, and commercial, to increase the capacity for jobs and housing in the Central SoMa Plan Area. On Draft EIR p. IV-5, analysis of Plan impacts related to such increases was based on growth projections developed by the Planning Department from regional growth forecasts. It would be speculative to quantify the number of units that could be used for such purposes. Leasing private property for the purpose of short-term rentals is subject to City regulations administered by the San Francisco Office of Short-Term Rentals, pursuant to Administrative Code Chapter 41A. The commenter also provides no evidence that short-term rentals result in greater physical environmental impacts than fully occupied units. In fact, as explained in Response TR-2, p. RTC-134, it is likely that units occupied on a temporary basis would result in less daily impact, particularly related to VMT, than continuously occupied units because hotel use—which can be assumed to have travel demand comparable to short-term rental units, generates fewer daily and peak-hour trips than does residential use. As such, no revisions to the Draft EIR are necessary.

Comment GC-14: South of Market Area (SoMa) Distances

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

I-Hestor-2.6

"The Plan reiterates the thing I've been complaining about for decades. Blocks south of Market are different from blocks north of Market. When they say, 'Oh, it's only a two-block area from the Fourth Street rail,' it's ridiculous. No one knows them as two blocks if you're used to north of Market blocks or residential blocks. The distance has to be spelled out every time." *(Sue C. Hestor, Hearing Transcript, January 26, 2017 [I-Hestor-2.6])*

Response GC-14

The comment states that setting forth distances in "blocks" is misleading with respect to the SoMa neighborhood, including the Plan Area, given SoMa's larger-than-typical blocks. To provide further detail regarding distances cited in the Draft EIR, the following revisions are made (deleted text is shown in ~~strikethrough~~; new text is double-underlined):

On Draft EIR p. IV.B-12, the first sentence of the fifth paragraph is revised as follows:

> The visual character of the area just two blocks north of the Plan Area (within 1,200 feet) is dominated by large, relatively shorter structures on large lots. …

On p. IV.C-12, the fifth sentence of the second full paragraph is revised as follows:

> … A new Bessie Carmichael School/FEC was built for grades K-5 at 375 Seventh Street (a block [about 800 feet] west of the Plan Area) in 2004, with the Harrison Street campus now serving as the campus' middle school; together, the two facilities comprise the only public school in the South of Market. …

On p. IV.C-12, the seventh sentence of the second full paragraph is revised as follows:

> … Since that time, the apartments have largely been occupied by newly arrived Filipino families, while the ground floor commercial space has provided a home for numerous Filipino community organizations, such as the West Bay Pilipino Multi-Service Center (now on Seventh Street, a block [about 800 feet] west of the Plan Area), the South of Market Employment Center, Bayanihan Community Center (now located in the Bayanihan House at 1010 Mission Street, just west of the Plan Area), and Bindlestiff Studio theater (now on Sixth Street). …

On p. IV.D-80, the first sentence of the third full paragraph is revised as follows:

> The Plan's proposed street network changes would result in fewer mixed-flow travel lanes on a number of streets, which would reduce the available capacity for vehicles and thereby increase the number of vehicles in the remaining travel lanes, reduce the roadway width available for drivers to pull over to allow emergency vehicles to pass (e.g., due to raised buffers associated with ~~cycle tracks~~ protected bicycle lanes), and result in additional vehicle delay on these streets; however, the Plan's street network changes would not cause any complete permanent roadway closures or disruption to emergency vehicle access (the exception would be the closure of Essex Street which extends for one block (550 feet) between Folsom and Harrison Streets). …

On p. IV.E-5, the first full sentence of the first partial paragraph is revised as follows:

> … This location is two blocks (about 1,750 feet) east of San Francisco Fire Department Station No. 1 at 935 Folsom Street, and is on the route that fire apparatus travel when responding to calls north and east of the station, because all major streets in the area are one-way. …

On p. IV.G-17, the first sentence of the last partial paragraph is revised as follows:

> Based on an evaluation of proposed, approved, and under-construction buildings within four blocks (about 3,500 feet) upwind and two blocks (about 1,200 feet) crosswind of the Plan Area, it was determined that no specific buildings that could be developed under the cumulative scenario would combine with the wind effects of the Plan to result in a substantial cumulative impact related to wind, beyond those identified for the Plan, above. …

On p. IV.H-1, the last sentence, continuing onto p. IV.H-2, is revised as follows:

> … South Park, in the block bounded by Bryant, Second, Brannan, and Third Streets, is the only Recreation and Park Department property in the Plan Area, although Gene Friend Recreation Center is across Sixth Street from the Plan Area and Victoria Manalo Draves Park ~~and Gene Friend Recreation Center are~~ is about a half a block (about 310 feet) west of the Plan Area's boundary, located in the middle of the block between Columbia Square and Sherman Street. …

On p. IV.H-5, the first sentence of the first paragraph under the heading "Gene Friend Recreation Center" is revised as follows:

> Gene Friend Recreation Center is located on a 1-acre parcel at the northwest corner of Sixth and Folsom Streets, ~~a block outside of~~ across Sixth Street from the Central SoMa Plan Area, within the Western SoMa. …

On p. IV.H-8, the first sentence under the heading "Yerba Buena Lane" is revised as follows:

> Yerba Buena Lane is a one-block-long (550-foot-long) public pedestrian passage north of the Plan Area that connects Market Street to Mission Street. …

On p. IV.H-10, the first sentence of the second full paragraph is revised as follows:

> As noted, the only park subject to Section 295 within the Plan Area is South Park, although Gene Friend Recreation Center is just across Sixth Street from the Plan Area, and Victoria Manalo Draves Park is less than one-half block (about 310 feet) west of the Plan Area. …

On p. VI-33, the second sentence of the last partial paragraph is revised as follows:

> … The Central Subway will extend from Chinatown through the Union Square area, the Plan Area, and Mission Bay, and will pass within two blocks (less than 500 feet) of the Pier 70 development site before continuing south through the Bayview and into Visitacion Valley. …

On p. VI-34, the third sentence of the last paragraph is revised as follows:

> … The primary difference would be that the Modified TODCO Plan would extend the Western SoMa Plan's Folsom Street Neighborhood Commercial Transit (F-NCT) district two blocks (about 1,750 feet) east to Fourth Street, rather than zoning parcels along Folsom Street as Mixed-Use, General (MUG) or Mixed-Use, Office (MUO). …

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E. Draft EIR Revisions

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

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

E.1 Summary

The following revisions are made to the impacts statements and mitigation measures identified in Table S-1, Summary of Impacts of the Plan—Identified in the EIR, starting on p. S-7:

TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
…			
C. Cultural and Paleontological Resources			
Impact CP-1: Development under the Plan would result in the demolition or substantial alteration of individually identified historic architectural resources and/or contributors to a historic district or conservation district located in the Plan Area, including as-yet unidentified resources, a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	S	* **Mitigation Measure M-CP-1a: Avoidance or Minimization of Effects on ~~Identified~~ Historical Resources.** The project sponsor of a subsequent development project in the Plan Area shall consult with the Planning Department's ~~Preservation staff~~ at the time of submittal of an environmental evaluation application to determine whether there are feasible means to ~~redesign or otherwise revise the project to~~ avoid a substantial ~~significant~~ adverse change in the significance of an ~~effects on~~ historic architectural resource~~(s)~~ (including historic districts), whether previously identified or identified as part of the project's historical resources analysis. Pursuant to CEQA Guidelines Section 15064.5(b), "[s]ubstantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." If avoidance is not feasible, the project sponsor shall ~~seek feasible means to~~ reduce effects on historic architectural resource(s) to the maximum extent feasible. ~~a less than significant level,~~ Avoidance and minimization measures shall seek to retain the resource's character-defining features, and may include, but are not limited to: retention of character-defining features, building setbacks, salvage, or adaptive reuse. ~~with the significance of the impact to be judged based on whether the proposed project would materially impair the resource as defined in CEQA Guidelines Section 15064.5(b).~~ Should Mitigation Measure M-CP-1a be determined to be infeasible, Measures M-CP-1b, M-CP-1c, M-CP-1d, and/or M-CP-1e, shall be applicable, based on the specific circumstances of the project in question. CEQA Guidelines Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The applicability of each factor would vary from project to project, and would be determined by staff on a case-by-case basis. … * **Mitigation Measure M-CP-1c: Oral Histories.** For projects that would demolish a historical resource or contributor to a historic district for which Planning Department preservation staff determined that such a	SUM

LEGEND:

NI = No impact LTS = Less than significant or negligible impact; no mitigation required SU = Significant and unavoidable adverse impact, no feasible mitigation NA = Not Applicable

S = Significant LTSM = Less than significant or negligible impact; after mitigation SUM = Significant and unavoidable adverse impact, after mitigation

TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
		measure would be effective and feasible, the project sponsor shall undertake an oral history project prior to demolition or adverse alteration of the resource that includes interviews of people such as residents, past owners, or former employees. The project shall be conducted by a professional historian in conformance with the Oral History Association's Principles and Standards (http://alpha.dickinson/edu/oha/pub_eg.html). In addition to transcripts of the interviews, the oral history project shall include a narrative project summary report containing an introduction to the project, a methodology description, and brief summaries of each conducted interview. Copies of the completed oral history project shall be submitted to the San Francisco Public Library, Planning Department, or other interested historical institutions. … **Mitigation Measure M-CP-1e: Video Recordation.** For projects that would demolish a historical resource or contributor to a historic district for which Department Preservation ~~Planning~~ staff determined that such a measure would be effective and feasible, the project sponsor shall work with Department Preservation staff or other qualified professional, to undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated 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 Code of Federal Regulations, Part 61). The documentation shall ~~include as much information as possible—using~~ use visuals in combination with narration about the materials, construction methods, current condition, historic use, and historic context of the historical resource. Archival copies of the video documentation shall be submitted to the Planning Department, and to repositories including but not limited to~~:~~ the San Francisco Public Library, Northwest Information Center, and ~~the~~ California Historical Society. This mitigation measure would supplement the traditional HABS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research. The video documentation shall be reviewed and approved by the San Francisco Planning Department's Preservation staff prior to issuance of a demolition permit or site permit or issuance of any Building Permits for the project.	
…			
Impact CP-3: Construction activities in the Plan Area would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5,	S	* **M-CP-3a: Protect Historical Resources from Adjacent Construction Activities.** The project sponsor of a development project in the Plan Area shall consult with Planning Department Environmental Planning/Preservation staff to determine whether ~~adjacent or nearby~~ buildings constitute historical resources that could be adversely affected by construction-generated vibration. For purposes of this measure, nearby	LTSM

LEGEND:

NI = No impact LTS = Less than significant or negligible impact; no mitigation required SU = Significant and unavoidable adverse impact, no feasible mitigation NA = Not Applicable

S = Significant LTSM = Less than significant or negligible impact; after mitigation SUM = Significant and unavoidable adverse impact, after mitigation

TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
through indirect construction damage to historic architectural resources.		historic buildings shall include those within 100 feet of a construction site for a subsequent development project if pile driving would be used at that site; otherwise, it shall include historic buildings within 25 feet if vibratory and vibration-generating construction equipment, such as jackhammers, drill rigs, bulldozers, and vibratory rollers would be used. If one or more historical resources is identified that could be adversely affected, the project sponsor shall incorporate into construction specifications for the proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings. Such methods may include maintaining a safe distance between the construction site and the historic buildings (as identified by the Planning Department Preservation staff), using construction techniques that reduce vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation), appropriate excavation shoring methods to prevent movement of adjacent structures, and providing adequate security to minimize risks of vandalism and fire. No measures need be applied if no vibratory equipment would be employed or if there are no historic buildings within 100 feet of the project site. … **Mitigation Measure M-CP-3b: Construction Monitoring Program for Historical Resources.** For those historical resources identified in Mitigation Measure M-CP-3a, and where heavy equipment would be used on a subsequent development project, the project sponsor of such a project shall undertake a monitoring program to minimize damage to ~~adjacent~~ historic buildings and to ensure that any such damage is documented and repaired. The monitoring program, which shall apply within 100 feet where pile driving would be used and within 25 feet otherwise, shall include the following components, subject to access being granted by the owner(s) of adjacent properties, where applicable. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a pre-construction survey of historical resource(s) identified by the San Francisco Planning Department within 125 feet of planned construction to document and photograph the buildings' existing conditions. Based on the construction and condition of the resource(s), the consultant shall also establish a standard maximum vibration level that shall not be exceeded at each building, based on existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 inch per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard, the project sponsor shall monitor vibration levels at each structure and shall prohibit vibratory construction activities that generate vibration levels in excess of the standard. Should owner permission not be granted, the project sponsor shall employ alternative methods of vibration monitoring in areas under the control of the project sponsor. Should vibration levels be observed in excess of the standard, construction shall be halted and alternative construction techniques put in practice, to the extent feasible. (For example, pre-drilled piles could be substituted for driven piles, if feasible based on soils conditions; smaller, lighter equipment might be able to	

LEGEND:

NI = No impact LTS = Less than significant or negligible impact; no mitigation required SU = Significant and unavoidable adverse impact, no feasible mitigation NA = Not Applicable

S = Significant LTSM = Less than significant or negligible impact; after mitigation SUM = Significant and unavoidable adverse impact, after mitigation

TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
		be used in some cases.) The consultant shall conduct regular periodic inspections of each building during ground-disturbing activity on the project site. Should damage to either building occur, the building(s) shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity on the site.	
…			
Impact CP-5: Development under the Plan, including the proposed open space improvements and street network changes, could cause a substantial adverse change in the significance of a tribal cultural resource pursuant to CEQA Guidelines Section 21084.3.	S	* **Mitigation Measure M-CP-5: Project-Specific Tribal Cultural Resource Assessment.** This tribal cultural resource mitigation measure shall apply to any project involving any soils-disturbing or soils-improving activities including excavation, utilities installation, grading, soils remediation, compaction/chemical grouting to a depth of ~~five (5)~~ feet or greater below ground surface. Projects to which this mitigation measure applies shall be reviewed for the potential to affect a tribal cultural resource in tandem with the ~~P~~preliminary ~~A~~archeology ~~R~~review ~~(PAR)~~ of the project by the San Francisco Planning Department archeologist. For projects requiring a ~~M~~mitigated ~~N~~negative ~~D~~declaration or ~~E~~environmental ~~I~~impact ~~R~~report, the Planning Department "Notification Regarding Tribal Cultural Resources and CEQA" shall be distributed to the ~~D~~department's tribal distribution list. Consultation with California Native American tribes regarding the potential of the project to affect a tribal cultural resource will occur at the request of any notified tribe. For all projects subject to this mitigation measure, if staff determines that the proposed project may have a potential significant adverse effect on a tribal cultural resource, then the following shall be required as determined warranted by the ERO. If staff determines that preservation-in-place of the tribal cultural resource is both feasible and effective, based on information provided by the applicant regarding feasibility and other available information, then the project archeological consultant shall prepare an archeological resource preservation plan ~~(ARPP)~~. Implementation of the approved ~~ARPP~~ plan by the archeological consultant shall be required when feasible. If staff determines that preservation–in-place of the Tribal Cultural Resource is not a sufficient or feasible option, then the project sponsor shall implement an interpretive program of the ~~TCR~~ resource in coordination with affiliated Native American tribal representatives. An interpretive plan produced in coordination with affiliated Native American tribal representatives, at a minimum, and approved by the ERO shall be required to guide the interpretive program. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.	LTSM
…			

LEGEND:

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
D. Transportation and Circulation			
…			
Impact TR-3: Development under the Plan, including the proposed open space improvements and street network changes, would result in a substantial increase in transit demand that would not be accommodated by local transit capacity, and would cause a substantial increase in delays resulting in adverse impacts on local and regional transit routes.	S	*Editor's Note: Formatting corrections involving deletion of stray bullets and tabs in Mitigation Measures M-TR-3a – M-TR-3c are not shown in strikethrough for ease of reading.* **M-TR-3a: Transit Enhancements.** The following are City and County actions that could reduce the transit impacts associated with implementation of the Central SoMa Plan. *Enhanced Transit Funding.* To accommodate project transit demand, the SFMTA, and other City agencies and departments as appropriate, shall ~~ensure that~~ seek sufficient operating and capital funding ~~is secured~~, including through the following measures: ● Establish fee-based sources of revenue ~~such as parking benefit districts~~. ● Establish a congestion-charge scheme for downtown San Francisco, with all or a portion of the revenue collected going to support improved local and regional transit service on routes that serve Downtown and the Central SoMa Plan Area. ● ~~Seek grant funding for specific capital improvements from regional, state and federal sources.~~Area Plan funding for transit enhancements. *Transit Corridor Improvement Review.* During the design phase, the SFMTA shall review each street network project that contains portions of Muni transit routes where significant transit delay impacts have been identified (routes 8 Bayshore, 8AX Bayshore Express, 8BX Bayshore Express, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness). Through this review, SFMTA shall incorporate feasible street network design modifications that would meet the performance criteria of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Such features could include, but shall not be limited to, transit-only lanes, transit signal priority, queue jumps, stop consolidation, limited or express service, corner or sidewalk bulbs, and transit boarding islands, as determined by the SFMTA, to enhance transit service times and offset transit delay. Any subsequent changes to the street network designs shall be subject to a similar review process. *Transit Accessibility.* To enhance transit accessibility, the Planning Department and the SFMTA shall establish a coordinated planning process to link land use planning and development in Central SoMa to transit and other ~~transportation~~ sustainable mode planning. This shall be achieved through some or all of the following measures: ● Implement recommendations of the *Better Streets Plan* that are designed to make the pedestrian environment safer and more comfortable for walk trips throughout the day, especially in areas where sidewalks and other realms of the pedestrian environment are notably unattractive and intimidating for	SUM

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		pedestrians and discourage walking as a primary means of circulation. This includes traffic calming strategies in areas with fast-moving, one-way traffic, long blocks, narrow sidewalks and tow-away lanes, as may be found in much of the Central SoMa area. ● Implement building design features that promote primary access to buildings from transit stops and pedestrian areas, and discourage the location of primary access points to buildings through parking lots and other auto-oriented entryways. ● Develop Central SoMa transportation implementation programs that manage and direct resources brought in through pricing programs and development-based fee assessments, as outlined above, to further the multimodal implementation and maintenance of these transportation improvements. *Muni Storage and Maintenance.* To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall provide maintenance and storage facilities. ~~In 2013, the SFMTA prepared a Real Estate and Facilities Vision for the 21st Century report.[1] In 2014, an addendum to the *Real Estate and Facilities Vision for the 21st Century* report was prepared. The document provides a vision for addressing Muni's storage and maintenance needs, particularly in light of significant growth in fleet as well as changes in the fleet composition~~ **M-TR-3b: Boarding Improvements.** The SFMTA shall implement boarding improvements such as ~~low floor buses and pre-payment~~ the construction of additional bus bulbs or boarding islands where appropriate, that would reduce the boarding times to mitigate the impacts on transit travel times on routes where Plan ridership increases are greatest, such as the 8 Bayshore, 8AX/8BX Bayshore Expresses, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness routes. These boarding improvements, which would reduce delay associated with passengers boarding and alighting, shall be made in combination with **Mitigation Measures ~~M-TR-3c, Upgrade Transit-only Lanes on Third Street,~~ M-TR-3c~~d~~, Signalization and Intersection Restriping at Townsend/Fifth Streets**, ~~and M-TR-3e, Implement Tow-away Lanes on Fifth Street,~~ which would serve to reduce delay associated with traffic congestion along the transit route. ~~**M-TR-3d: Implement Tow-away Transit-only Lanes on Fifth Street.** The SFMTA shall implement a northbound tow-away transit-only lane on Fifth Street between Townsend and Bryant Streets during the PM peak period to mitigate the impacts on transit travel times on the 47 Van Ness. This peak period transit-only lane can be implemented by restricting on-street parking (about 30 parking spaces)~~	

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Impact TR-4: Development under the Plan, including the proposed open space improvements and street network changes, would not result in pedestrian safety hazards nor results in a substantial overcrowding on sidewalks or at corner locations, but would result in overcrowding at crosswalks.	S	* **M-TR-4: Upgrade Central SoMa Area Crosswalks.** ~~Consistent with the proposed provisions of the Plan to establish a minimum width of crosswalks of 15 feet, and up to 40 feet where future pedestrian volumes warrant, a~~As appropriate and feasible, the SFMTA shall widen and restripe the crosswalks to the continental design~~, consistent with the Better Streets Plan~~ when there is a street network improvement that upgrades sidewalk widths. With either the Howard/Folsom One-Way Option or Howard/Folsom Two-Way Option street network changes, the SFMTA shall~~ monitor crosswalk operations for deteriorated conditions (i.e., crosswalk operating conditions of LOS E or LOS F, or observations of substantial crosswalk overcrowding), and~~, as feasible, widen the following crosswalks: ● At the intersection of Third/Mission widen the east and west crosswalks~~ to 20 feet~~. ● At the intersection of Fourth/Mission widen the east crosswalk~~ to 40 feet~~, and widen the west crosswalk ~~to 35 feet~~. ● At the intersection of Fourth/Townsend widen the west crosswalk~~ to 30 feet~~.	SUM
Impact TR-5: Development under the Plan, including the proposed open space improvements and street network changes, would not result in potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicycle accessibility.	LTS	* **Improvement Measure I-TR-5a: ~~Cycle Track~~ Protected Bicycle Lane Public Education Campaign.** To further reduce potential conflicts between bicyclists and pedestrians, transit and other vehicles, the SFMTA could develop and implement a ~~cycle track~~ protected bicycle lanes public education campaign to develop safety awareness by providing information to the public through outreach channels such as media campaigns, brochures, and websites. This campaign would be in addition to the existing SFMTA bicycle safety outreach, specifically geared to Central SoMa and~~ cycle tracks~~ protected bicycle lanes. Elements of the education campaign could include: ● Clarifying rules of the road for~~ cycle tracks~~ protected bicycle lanes. ● Improving pedestrian awareness about where to wait and how to cross the ~~cycle track~~ protected bicycle lane (i.e., on the sidewalk or buffer zone, rather than in the ~~cycle track~~ separated lane or adjacent to parked vehicles). ● ~~Providing bicycle safety education for neighborhood schools (e.g., the Bessie Carmichael School), and neighborhood groups within Central SoMa.~~ ● Ensuring that the San Francisco Police Department officers are initially and repeatedly educated on traffic law as it applies to bicyclists and motorists. ● Providing safety compliance education for bicyclists coupled with increased enforcement for violations by bicyclists. The public education campaign could include a~~ website~~ webpage, as well as instruction videos with information for cyclists, motorists, and pedestrians.~~ To the extent possible, the public education campaign~~	NA

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		~~could be coordinated with the San Francisco Bicycle Coalition efforts.~~ The public education should be coordinated, to the extent possible, with community organizations including the South of Market Community Action Network (SOMCAN), San Francisco Bicycle Coalition, and neighborhood business groups. * **Improvement Measure I-TR-5b: ~~Cycle Track~~ Protected Bicycle Lane Post-Implementation Surveys.** Following implementation of the ~~cycle tracks~~ protected bicycle lanes on Howard, Folsom, Brannan, Third and Fourth Streets, the SFMTA could conduct motorist, pedestrian, bicycle, and business surveys to understand how the protected bicycle lanes cycle tracks are performing, and to make adjustments to the design and supplemental public education campaign. In addition to the user surveys, the post-implementation assessment could include before/after photos, bicyclist ridership and traffic volume counts, video analysis of behavior of bicyclists, pedestrians, and drivers, assessment of vehicle queuing, and compliance with new signs/signals. The information would be used as input for subsequent design and implementation of ~~cycle tracks~~ protected bicycle lanes on other streets in San Francisco, as well as documenting the effectiveness of the ~~cycle track~~ protected bicycle lane.	
Impact TR-6: Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial and passenger loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or pedestrians.	S	* **Mitigation Measure M-TR-6a: Driveway and Loading Operations Plan (DLOP).** Sponsors of development projects that provide more than 100,000 square feet of residential, office, industrial, or commercial uses shall prepare a DLOP, and submit the plan for review and approval by the Planning Department and the SFMTA in order to reduce potential conflicts between driveway operations, including loading activities, and pedestrians, bicycles and vehicles, and to maximize reliance of on-site loading spaces to accommodate new loading demand. The DLOP shall be submitted along with a building permit and approval should occur prior to the certificate of occupancy. Prior to preparing the DLOP, the project sponsor shall meet with the Planning Department and the SFMTA to review the proposed number, location, and design of the on-site loading spaces, as well as the projected loading demand during the entitlement/environmental review process. In addition to reviewing the on-site loading spaces and projected loading demand, the project sponsor shall provide the Planning Department and SFMTA a streetscape plan that shows the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way. In the event that the number of on-site loading spaces does not accommodate the projected loading demand for the proposed development, the project sponsor shall pursue with the SFMTA conversion of nearby on-street parking spaces to commercial loading spaces, if determined feasible by the SFMTA. The DLOP shall be revised to reflect changes in accepted technology or operation protocols, or changes in conditions, as deemed necessary by the Planning Department and the SFMTA. The DLOP shall include the following components, as appropriate to the type of development and adjacent street characteristics: ● *Loading Dock Management.* To ensure that off-street loading facilities are efficiently used, and that trucks that are longer than can be safely accommodated are not permitted to use a building's loading dock, the	SUM

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		project sponsor of a development project in the Plan Area shall develop a plan for management of the building's loading dock and shall ensure that tenants in the building are informed of limitations and conditions on loading schedules and truck size. The management plan could include strategies such as the use of an attendant to direct and guide trucks, installing a "Full" sign at the garage/loading dock driveway, limiting activity during peak hours, installation of audible and/or visual warning devices, and other features. Additionally, as part of the project application process, the project sponsor shall consult with the SFMTA concerning the design of loading and parking facilities. • *Garage/Loading Dock Attendant.* If warranted by project-specific conditions, the project sponsor of a development project in the Plan Area shall ensure that building management employs attendant(s) for the project's parking garage and/or loading dock, as applicable. The attendant would be stationed as determined by the project-specific review analysis, typically at the project's driveway to direct vehicles entering and exiting the building and avoid any safety-related conflicts with pedestrians on the sidewalk during the a.m. and p.m. peak periods of traffic, bicycle, and pedestrian activity, with extended hours as dictated by traffic, bicycle and pedestrian conditions and by activity in the project garage and loading dock. Each project shall also install audible and/or visible warning devices, or comparably effective warning devices as approved by the Planning Department and/or the SFMTA, to alert pedestrians of the outbound vehicles from the parking garage and/or loading dock, as applicable. • *Large Truck Access.* The loading dock attendant shall dictate the maximum size of truck that can be accommodated at the on-site loading area. In order to accommodate any large trucks (i.e., generally longer than 40 feet) that may require occasional access to the site (e.g., large move-in trucks that need occasional access to both residential and commercial developments), the DLOP plan shall include procedures as to the location of on-street accommodation, time of day restrictions for accommodating larger vehicles, and procedures to reserve available curbside space on adjacent streets from the SFMTA. • *Trash/Recycling/Compost Collection Design and Management.* When designs for buildings are being developed, the project sponsor or representative shall meet with the appropriate representative from Recology (or other trash collection firm) to determine the location and type of trash/recycling/compost bins, frequency of collections, and procedures for collection activities, including the location of Recology trucks during collection. The location of the trash/recycling/compost storage room(s) for each building shall be indicated on the building plans prior to submittal of plans to the Building Department. Procedures for collection shall ensure that the collection bins are not placed within any sidewalk, bicycle facility, parking lane or travel lane adjacent to the project site at any time. • *Delivery Storage.* Design the loading dock area to allow for unassisted delivery systems (i.e., a range of delivery systems that eliminate the need for human intervention at the receiving end), particularly for use when the receiver site (e.g., retail space) is not in operation. Examples could include the receiver site	

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		providing a key or electronic fob to loading vehicle operators, which enables the loading vehicle operator to deposit the goods inside the business or in a secured area that is separated from the business. The final DLOP and all revisions shall be reviewed and approved by the Environmental Review Officer or designee of the Planning Department and the Sustainable Streets Director or designee of the SFMTA. The DLOP will be memorialized in the notice of special restrictions on the project site permit. * **Mitigation Measure M-TR-6b: Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones.** The SFMTA shall develop a curb management strategy (strategy) for Central SoMa or within proximity of the street network changes that articulates curb use priorities for different types of streets, while safely managing loading demands. This strategy should guide the approach to any affected commercial and passenger loading/unloading zones (loading zones) during any City agency's development of detailed plans for each segment of the proposed street network changes. Replacement of loading zones will be considered, to the extent feasible. ~~detailed plans for each segment of the proposed street network changes that identify existing on-street commercial loading spaces and passenger loading/unloading zones, and then identify how demand within the existing loading facilities could be accommodated with the proposed street network changes. The detailed design shall also consider on-street loading supply needs for new development, as well as driveway access to loading facilities within existing and future buildings along the affected segments. The detailed design for each segment shall be prepared within a reasonable time frame of physical implementation to ensure that future land use conditions are reflected.~~ ~~As part of detailed design for each affected street the SFMTA shall conduct the following:~~ ~~1. Document the existing commercial loading spaces and passenger loading/unloading zones at the time of detailed design.~~ ~~2. Conduct loading demand surveys/observation at appropriate times of day for each type of loading activity, to determine the actual demand associated with the on-street spaces and the need to replace or augment the on-street commercial loading spaces.~~ ~~3. Identify replacement commercial loading spaces and passenger loading/unloading spaces. Commercial loading spaces should be prioritized over parking spaces, and, to the extent feasible, the replacement commercial loading spaces shall be of similar length on the same block and side of the street. Where commercial loading spaces would be permanently removed, install new commercial loading spaces within 250 feet on adjacent side streets if feasible.~~ ~~4. At each location where passenger loading/unloading zones would be eliminated, contact the permit holder to determine adequacy of alternate locations and/or need for the passenger loading/unloading space. In some locations, such as schools and hotels, passenger loading/unloading activities could be accommodated within commercial loading spaces, with time of day restrictions.~~	

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		~~5. Conduct business surveys and review detailed plans with merchant associations or other local stakeholders to determine need for commercial loading spaces.~~ ~~6. Develop and implement a public education campaign regarding the street network changes, reduction or elimination of on-street parking spaces, location of replacement commercial loading spaces, and any time-of-day restrictions. On streets where on-street parking would be completely eliminated, provide information regarding commercial loading space supply on adjacent streets. In addition, provide information regarding California Vehicle Code §22500 and San Francisco Transportation Code §7.2.70 that loading activities (either truck or passenger loading/unloading) should not occur while stopped in any crosswalk, bicycle lane or travel lane.~~ The SFMTA and the Planning Department ~~shall~~ should develop protocols for ongoing assessment of commercial and passenger loading needs on the affected streets, and for review of new development projects along the affected street segments to identify needed changes to the street network design (e.g., when a new driveway to a development site is required), or need for additional on-street commercial and passenger loading spaces. ~~In addition, the SFMTA shall explore the potential to develop and implement an off-hour delivery program to shift delivery windows for commercial deliveries to times when conflicts are less likely to occur. Such a program could be implemented as a pilot project, similar to the pilot project conducted in New York City in 2009–2010.3 Most commercial loading spaces in Central SoMa are metered, and the off-hour delivery program can include pricing to reduce the amount of time vehicles park, stand or stop at the curb, so that spaces turn over for more users, and double parking is minimized.~~	
…			
Impact TR-8: Development under the Plan, including the proposed open space improvements and street network changes, could result in significant impacts on emergency vehicle access.	S	* **Mitigation Measure M-TR-8: Emergency Vehicle Access Consultation.** For street network projects that reduce the number of available vehicle travel lanes for a total distance of more than one block where transit-only lanes are not provided: Street network projects shall be designed to comply with adopted city codes regarding street widths, curb widths, and turning movements. To the degree feasible while still accomplishing safety-related project objectives, SFMTA shall design street network projects to include features that create potential opportunities for cars to clear travel lanes for emergency vehicles. Examples of such features include: curbside loading zones, customized signal timing, or other approaches developed through ongoing consultation between SFMTA and the San Francisco Fire Department. ~~During the design phase of each street network project, SFMTA shall consult with emergency service providers, including the San Francisco Fire Department and the San Francisco Police Department. Through the consultation process, the street network design shall be modified as needed to maintain emergency vehicle access. SFMTA shall identify design modifications through this process, as needed to meet the following performance criteria:~~	LTSM

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		~~● No physical barriers shall be introduced that would preclude emergency vehicle access.~~ ~~Street design modifications should achieve the goals of the project without precluding emergency vehicle access. Design modifications selected by SFMTA, as needed to meet the performance criteria, shall be incorporated into the final design of each street network project and could include, but shall not be limited to: mountable concrete buffers, mountable curbs and corner or sidewalk bulbs, modification of corner or sidewalk bulbs and curb locations to accommodate turning emergency vehicles, and emergency vehicle signal priority. Any subsequent changes to the streetscape designs shall be subject to a similar consultation process.~~	
Impact TR-9: Construction activities associated with development under the Plan, including the proposed open space improvements and street network changes, would result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas, and would result in potentially hazardous conditions.	S	* **Mitigation Measure M-TR-9: Construction Management Plan and Construction Coordination.** *Construction Management Plan*—For projects within the Plan Area, the project sponsor shall develop and, upon review and approval by the SFMTA and Public Works, implement a Construction Management Plan, addressing transportation-related circulation, access, staging and hours of delivery. The Construction Management Plan would disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruption and ensure that overall circulation in the project area is maintained to the extent possible, with particular focus on ensuring transit, pedestrian, and bicycle connectivity. The Construction Management Plan would supplement and expand, rather than modify or supersede, an~~dy~~y manual, regulations, or provisions set forth by the SFMTA, Public Works, or other City departments and agencies, and the California Department of Transportation. If construction of the proposed project is determined to overlap with nearby adjacent project(s) as to result in transportation-related impacts, the project sponsor or its contractor(s) shall consult with various City departments such as the SFMTA and Public Works~~ through ISCOTT~~, and other interdepartmental meetings as deemed necessary by the SFMTA, Public Works, and the Planning Department, to develop a Coordinated Construction Management Plan.~~ The Coordinated Construction Management Plan that shall address construction related vehicle routing, detours, and maintaining transit, bicycle, vehicle, and pedestrian movements in the vicinity of the construction area for the duration of the construction period overlap. Key coordination meetings shall be held jointly between project sponsors and contractors of other projects for which the City departments determine construction impacts could overlap.~~ The Coordinated Construction Management Plan, to be prepared by the contractor, would be reviewed by the SFMTA and would address issues of circulation (traffic, pedestrians, and bicycle), safety, parking and other project construction in the area. Based on review of the construction logistics plan, the project may be required to consult with SFMTA Muni Operations prior to construction to review potential effects to nearby transit operations. The Construction Management Plan and, if required, the Coordinated Construction Management Plan, shall include, but not be limited to, the following:	SUM

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(Revision for this bullet provided in Response TR-13)		• *Restricted Construction Truck Access Hours*—Limit construction truck movements ~~to~~ during the hours between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 7:00 p.m., ~~or~~ and other times if ~~approved~~ required by the SFMTA, to minimize disruption to vehicular traffic, including transit during the a.m. and p.m. peak periods. • *Construction Truck Routing Plans*—Identify optimal truck routes between the regional facilities and the project site, taking into consideration truck routes of other development projects and any construction activities affecting the roadway network. • *Coordination of Temporary Lane and Sidewalk Closures*—The project sponsor shall coordinate travel lane closures with other projects requesting concurrent lane and sidewalk closures through ~~the ISCOTT and~~ interdepartmental meetings~~ process above~~, to minimize the extent and duration of requested lane and sidewalk closures. Travel lane closures shall be minimized especially along transit and bicycle routes, so as to limit the impacts to transit service and bicycle circulation and safety. • *Maintenance of Transit, Vehicle, Bicycle, and Pedestrian Access*—The project sponsor/construction contractor(s) shall meet with Public Works, SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to include in the Coordinated Construction Management Plan to maintain access for transit, vehicles, bicycles and pedestrians. This shall include an assessment of the need for temporary transit stop relocations or other measures to reduce potential traffic, bicycle, and transit disruption and pedestrian circulation effects during construction of the project. • *Carpool, Bicycle, Walk and Transit Access for Construction Workers*—The construction contractor shall include methods to encourage carpooling, bicycling, walk and transit access to the project site by construction workers (such as providing transit subsidies to construction workers, providing secure bicycle parking spaces, participating in free-to-employee ride matching program from www.511.org, participating in emergency ride home program through the City of San Francisco (www.sferh.org), and providing transit information to construction workers). • *Construction Worker Parking Plan*—The location of construction worker parking shall be identified as well as the person(s) responsible for monitoring the implementation of the proposed parking plan. The use of on-street parking to accommodate construction worker parking shall be discouraged. All construction bid documents shall include a requirement for the construction contractor to identify the proposed location of construction worker parking. If on-site, the location, number of parking spaces, and area where vehicles would enter and exit the site shall be required. If off-site parking is proposed to accommodate construction workers, the location of the off-site facility, number of parking spaces retained, and description of how workers would travel between off-site facility and project site shall be required. • *Project Construction Updates for Adjacent Businesses and Residents*—To minimize construction impacts on access for nearby institutions and businesses, the project sponsor shall provide nearby residences and	

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		adjacent businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and lane closures. At regular intervals to be defined in the Construction Management Plan and, if necessary, in the Coordinated Construction Management Plan, a regular email notice shall be distributed by the project sponsor that shall provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns.	
…			
Impact C-TR-6: Development under the Plan, including the proposed open space improvements and street network changes, and the associated increased demand of on-street loading, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative loading impacts.	S	Implement **Mitigation Measure M-TR-6a, Driveway and Loading Operations Plan**, and **Mitigation Measure M-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones**.	SUM
…			
E. Noise and Vibration			
Impact NO-1: Development under the Plan, including the proposed street network changes, would generate noise that would result in exposure of persons to noise levels in excess of standards in the *San Francisco General Plan* or Noise Ordinance (Article 29 of the *Police Code*), and would result in a substantial permanent increase in ambient noise above existing levels.	S	**Mitigation Measure M-NO-1a: Transportation Demand Management for New Development Projects.** To reduce vehicle noise from subsequent development projects in the Plan Area, the project sponsor and subsequent property owners (excluding 100 percent affordable housing projects) shall develop and implement a TDM Plan for a proposed project's net new uses (including net new accessory parking spaces) as part of project approval. The scope and number of TDM measures included in the TDM Plan shall be in accordance with Planning Department's TDM Program Standards for the type of development proposed, and accompanying appendices.[136] The TDM Program Standards and accompanying appendices are expected to be refined as planning for the proposed TDM Ordinance continues. Each subsequent development project's TDM Plan for proposed net new uses shall conform to the most recent version of the TDM Program Standards and accompanying appendices available at the time of the project Approval Action, as Approval Action is defined in Section 31.04(h) of the San Francisco Administrative Code. The Planning Department shall review and approve the TDM Plan, as well as any subsequent revisions to the TDM Plan. The TDM Plan shall target	SUM

[136] San Francisco Planning Department, ~~*Draft* TDM Program Standards~~, February 2017 ~~July 2016~~, and accompanying appendices, which implements the adopted TDM Ordinance (Ordinance No. 34-17, effective March 19 2017),. ~~Available at *http://sf-planning.org/tdm-materials-and-resources*~~, accessed on ~~September 19, 2016~~ July 13, 2017.

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

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		a reduction in the vehicle miles traveled (VMT) rate (i.e., VMT per capita), monitor and evaluate project performance (actual VMT), and adjust TDM measures over time to attempt to meet VMT target reduction. This measure is applicable to all projects within the Plan Area that do not otherwise qualify for an exemption under Article 19 of the CEQA Guidelines. This measure ~~may be~~ is superseded for those projects that are already required to fully comply with the ~~if a comparable~~ TDM Program Standards ~~Ordinance is adopted~~ (i.e., without reductions in target requirements) ~~that applies to projects~~ in the Plan Area. ~~The TDM Plan shall be developed by the project sponsor for each particular development project, and shall aim to achieve the maximum VMT rate reduction feasible.~~ The TDM Plan shall be developed in consultation with the Planning Department and rely generally on implementation of measures listed in ~~*Updating Transportation Impacts Analysis in the CEQA Guidelines* document published by California Office of Planning and Research on August 6, 2014, or whatever document supersedes it, and~~ the Planning Department TDM Program Standards and accompanying appendices in effect at the time of the Project Approval Action. The TDM program may include, but is not limited to the types of measures, which are summarized below for explanatory example purposes. Actual development project TDM measures shall be applied from the TDM Program Standards and accompanying appendices, which describe the scope and applicability of candidate measures in detail: 1. Active Transportation: Provision of streetscape improvements to encourage walking, secure bicycle parking, shower and locker facilities for cyclists, subsidized ~~bike~~ bicycle share memberships for project occupants, bicycle repair and maintenance services, and other bicycle-related services; 2. Car-Share: Provision of car-share parking spaces and subsidized memberships for project occupants; 3. Delivery: Provision of amenities and services to support delivery of goods to project occupants; 4. Family-Oriented Measures: Provision of on-site childcare and other amenities to support the use of sustainable transportation modes by families; 5. High-Occupancy Vehicles: Provision of carpooling/vanpooling incentives and shuttle bus service; 6. Information: Provision of multimodal wayfinding signage, transportation information displays, and tailored transportation marketing services; 7. Land Use: Provision of on-site affordable housing and healthy food retail services in underserved areas; and 8. Parking: Provision of unbundled parking, short-term daily parking provision, parking cash out offers, and reduced off-street parking supply. **Mitigation Measure M-NO-1b: Siting of Noise-Generating Uses.** To reduce potential conflicts between existing sensitive receptors and new noise-generating uses, for new development including PDR, Places of Entertainment, or other uses that may require the siting of new emergency generators/fire pumps or noisier-than-typical mechanical equipment, or facilities that generate substantial nighttime truck and/or bus traffic that would potentially generate noise levels substantially in excess of ambient noise (either short-term during	

LEGEND:

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
		the nighttime hours, or as a 24-hour average), the Planning Department shall require the preparation of a noise analysis that includes, at a minimum, a site survey to identify potential noise-sensitive uses within 900 feet of, and that have a direct line-of-sight to, the project site, and including at least one 24-hour noise measurement (with maximum noise level readings taken so as to be able to accurately describe maximum levels reached during nighttime hours), prior to the first project approval action. The analysis shall be prepared by persons qualified in acoustical analysis and/or engineering and shall demonstrate ~~with reasonable certainty that the proposed use would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use~~ that the proposed use would meet the noise standard identified in San Francisco Police Code Article 29. Should ~~such~~ any concerns be present, the Department ~~may~~ shall require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering ~~prior to the first project approval action~~, and the incorporation of noise reduction measures as recommended by the noise assessment prior to the first project approval action.	

…

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
F. Air Quality			
…			
Impact AQ-3: Operation of subsequent individual development projects in the Plan Area and street network changes, but not proposed open space improvements, would violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. (Revision for this bullet provided in Response AQ-2)	S	… * **Mitigation Measure M-AQ-3a: Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products.** Prior to receipt of any certificate of final occupancy ~~building permit~~ and every five years thereafter, the project sponsor shall develop electronic correspondence to be distributed by email or posted on-site annually to tenants of the project that encourages the purchase of consumer products and paints that are better for the environment and generate less VOC emissions. The correspondence shall encourage environmentally preferable purchasing and shall include contact information and links to SF Approved.[5] * **Mitigation Measure M-AQ-3b: Reduce Operational Emissions.** Proposed projects that would exceed the criteria air pollutant thresholds in this EIR shall implement the additional measures, as applicable and feasible, to reduce operational criteria air pollutant emissions. Such measures may include, but are not limited to, the following: ● For any proposed refrigerated warehouses or large (greater than 20,000 square feet) grocery retailers, provide electrical hook-ups for diesel trucks with Transportation Refrigeration Units at the loading docks. ● Use low- and super-compliant VOC architectural coatings in maintaining buildings. "Low-VOC" refers to paints that meet the more stringent regulatory limits in South Coast Air Quality Management District Rule 1113; however, many manufacturers have reformulated to levels well below these limits. These are referred to as "Super-Compliant" architectural coatings. ● Implement **Mitigation Measure M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps**. ● Other measures that are shown to effectively reduce criteria air pollutant emissions onsite or offsite (e.g., mitigation offsets) if emissions reductions are realized within the SFBAAB. Measures to reduce emissions onsite are preferable to offsite emissions reductions.	SUM

[5] SF Approved (sfapproved.org) is administrated by the San Francisco Department of Environment staff, who identifies products and services that are safer and better for the environment (e.g., those that are listed as "Required" or "Suggested").

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
Impact AQ-5: Development under the Plan, including proposed street network changes, would result in operational emissions of fine particulate matter ($PM_{2.5}$) and toxic air contaminants that would result in exposure of sensitive receptors to substantial pollutant concentrations.	S	* **M-AQ-5e: Central SoMa Air Quality Improvement Strategy.** The Central SoMa Plan is expected to generate $22 million in revenue dedicated to greening and air quality improvements. A portion of these monies shall be dedicated to identifying and exploring the feasibility and effectiveness of additional measures that would reduce the generation of, and/or exposure of such emissions to persons whose primary residence is within the Plan Area and whose residence does not provide enhanced ventilation that complies with San Francisco Health Code Article 38. Objective 6.5 of the Plan calls for improvements to air quality, with specific strategies to support reduced vehicle miles traveled, increased greening around the freeway to improve air quality and use of building materials and technologies that improve indoor and outdoor air quality. The Planning Department, in cooperation with other interested agencies or organizations, shall consider additional actions for the Central SoMa Plan Area with the goal of reducing Plan-generated emissions and population exposure including, but not limited to: ● Collection of air quality monitoring data that could provide decision makers with information to identify specific areas of the Plan where changes in air quality have occurred and focus air quality improvements on these areas; ● Additional measures that could be incorporated into the City's Transportation Demand Management program with the goal of further reducing vehicle trips; ● Incentives for replacement or upgrade of existing emissions sources; ● Other measures to reduce pollutant exposure, such as distribution of portable air cleaning devices; and ● Public education regarding reducing air pollutant emissions and their health effects. The Department shall develop a strategy to explore the feasibility of additional air quality improvements within four years of plan adoption.	SUM

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TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
Impact C-AQ-2: Development under the Plan, including the proposed street network changes, but not open space improvements, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in exposure of sensitive receptors to substantial levels of fine particulate matter ($PM_{2.5}$) and toxic air contaminants under 2040 cumulative conditions.	S	* Implement **Mitigation Measure M-NO-1a, Transportation Demand Management for Development Projects**. (see Noise Impact NO-1a in this Summary Table) Implement **Mitigation Measures M-AQ-2, Central SoMa Air Quality Improvement Strategy, M-AQ-4b, Construction Emissions Minimization Plan**, **M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps**, **M-AQ-5b, Siting of Uses that Emit Particulate Matter ($PM_{2.5}$), Diesel Particulate Matter, or Other Toxic Air Contaminants**, **M-AQ-5c, Update Air Pollution Exposure Zone for San Francisco Health Code Article 38**, and ~~**Mitigation Measure**~~ **M-AQ-6b, Implement Clean Construction Requirements**. As discussed above, the Department of Public Health is required to update the Air Pollutant Exposure Zone map at least every five years in accordance with *San Francisco Health Code* Article 38. The updated mapping would capture parcels that could be added to the APEZ as a result of future traffic. Mitigation Measures M AQ 4b, M AQ 5a, and M AQ 6b would apply to the Air Pollutant Exposure Zone of *San Francisco Health Code* Article 38 in effect at the time subsequent development projects are proposed.	SUM

…

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The following revisions are made to the impacts statements and mitigation measures identified in Table S-2, Summary of Impacts of the Plan—Identified in the Initial Study, starting on p. S-43:

TABLE S-2 SUMMARY OF IMPACTS OF THE PLAN—IDENTIFIED IN THE INITIAL STUDY [REVISIONS ONLY]

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
…			
Biological Resources			
* **Impact BI-1:** Development under to the Plan and the proposed street network changes has the potential to adversely affect special-status species and to interfere with the movement of wildlife species.	S	* **M-BI-1: Pre-Construction Bat Surveys:** Conditions of approval for building permits issued for construction within the Plan Area shall include a requirement for pre-construction special-status bat surveys when ~~large~~ trees with a diameter at breast height equal to or greater than 6 inches are to be removed ~~or underutilized~~ or vacant buildings that have been vacant for 6 months or longer are to be demolished. If active day or night roosts are found, a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with the CDFW allowing the biologist to handle and collect bats) shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no disturbance buffer shall be created around active bat roosts being used for maternity or hibernation purposes at a distance to be determined in consultation with CDFG. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would necessary.	LTSM
…			

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The following revisions are made to the impact statements concerning loading, Impact TR-6 and Impact C-TR-6, in Table S-3, Comparison of the Environmental Impacts of the Plan to the Impacts of Alternatives, starting on p. S-58:

TABLE S-3 COMPARISON OF THE ENVIRONMENTAL IMPACTS OF THE PLAN TO THE IMPACTS OF ALTERNATIVES

Impacts	Central SoMa Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Heights Alternative	Alternative 3: Modified TODCO Plan	Alternative 4: Land Use Variant	Alternative 5: Land Use Plan Only Alternative
…						
D. Transportation and Circulation						
…						
Loading	**Impact TR-6:** Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles or pedestrians. **(SUM)**	Less loading demand than the proposed Plan; no reduction in on-street parking. (LTS)	Less loading demand than the proposed Plan. (SUM)	Similar to the proposed Plan. (SUM)	Loading demand similar to the proposed Plan. (SUM)	Same loading demand as the proposed Plan; no reduction in on-street loading supply. (LTSM)

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TABLE S-3 COMPARISON OF THE ENVIRONMENTAL IMPACTS OF THE PLAN TO THE IMPACTS OF ALTERNATIVES

Impacts	Central SoMa Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Heights Alternative	Alternative 3: Modified TODCO Plan	Alternative 4: Land Use Variant	Alternative 5: Land Use Plan Only Alternative
…						
Cumulative Loading	**Impact C-TR-6:** Development under the Plan, including the proposed open space improvements and the street network changes, and the associated increased demand of on-street loading, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative loading impacts. **(SUM)**	Less loading demand than the proposed Plan; no reduction in on-street loading supply. (LTS)	Less loading demand than the proposed Plan. (SUM)	Less loading demand than the proposed Plan. (SUM)	Similar to the proposed Plan. (SUM)	Same loading demand as the proposed Plan; no reduction in on-street loading supply. (LTS)
…						

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E.2 Introduction

* On Draft EIR p. I-9, the following text is added to clarify that subsequent projects that comply with the requirements of a Housing Sustainability District would not require further environmental review:

I.B.5 Environmental Review of a Housing Sustainability District (HSD) and Subsequent Housing Sustainability Projects

On January 1, 2018, California Assembly Bill (AB) 73 went into effect. AB 73 adds new Sections 66200–66210 to the Government Code and authorizes local municipalities to establish Housing Sustainability Districts (HSD) to facilitate the production of housing in areas served by existing infrastructure. Housing projects located within a designated HSD that meet certain requirements may utilize a streamlined and ministerial approval process. Pursuant to CEQA Guidelines Section 21155.10, "A lead agency shall prepare an environmental impact report when designating a housing sustainability district pursuant to Section 66201 of the Government Code to identify and mitigate, to the extent feasible, environmental impacts resulting from the designation. The environmental impact report shall identify mitigation measures that may be undertaken by housing projects in the housing sustainability district to mitigate the environmental impacts identified by the environmental impact report."[134]

The City, through adoption of an ordinance by the Board of Supervisors, could choose to designate portions of the Central SoMa Plan Area as an HSD. The HSD could include all parcels within the Central SoMa Plan Area that are zoned to permit residential use. Should the Central SoMa Plan Area be designated as a HSD and that designation not result in any changes to height, bulk, density, use or other development standards proposed in the Plan Area, implementation of the HSD would not change or intensify the expected physical or programmatic parameters of development expected or allowed under the proposed Central SoMa Plan. Therefore, designation of the Central SoMa Plan Area as part of a HSD would not change any of the conclusions reached in this EIR. Furthermore, eligible projects seeking entitlement under the HSD would be required to meet adopted design review standards, be approvable through a ministerial process, and incorporate applicable mitigation measures from this EIR. Pursuant to AB 73, subsequent projects in the Plan Area that meet the requirements of a HSD would not require further environmental review.

* In addition, to clarify that subsequent development projects that comply with the requirements of a HSD would not require further environmental review, the following edit has been made to this sentence and similar sentences that appear throughout the Draft EIR:

> "This EIR assumes that subsequent development projects in the Plan Area would be subject to environmental review at such times those projects are proposed, as applicable."

This change occurs on Draft EIR pp. I-6, I-7, I-8, IV-8, IV.D-25, IV.D-36, IV.D-39, IV.H-21, and IV.D-88.

[134] Full text of the bill is available at *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB73*.

E.3 Chapter II, Project Description

* On Draft EIR p. II-1, the following text is added under Section II.A, Overview, to address HSDs:

Additionally, the Central SoMa Plan Area may be designated as a Housing Sustainability District (HSD) in accordance with AB 73 (passed January 1, 2018). Pursuant to AB 73, subsequent projects in the Plan Area that meet the requirements of a HSD would not require further environmental review.

* On Draft EIR p. II-7, the following text is revised to reflect changes to the 2018 Draft Plan from the 2016 Draft Plan:

This section describes the Plan analyzed in this EIR. The Plan consists of the proposed goals, objectives, policies, and implementation measures contained in the ~~August 2016~~ February 2018 draft of the Central SoMa Plan, plus the following components that are not specifically part of the draft Plan:

- Height limits for several parcels, as shown in Figure II-7 on p. II-19, are higher than those proposed in the ~~2016~~2018 draft Central SoMa Plan. These include the following locations:
  - Block 3733: the Plan examined in the EIR includes a height limit of 130 feet along Folsom Street, whereas the draft Central SoMa Plan proposes a height limit of 85 feet;
  - Block 3762: the Plan examined in the EIR includes a height limit of 240 feet at the corner of Fourth and Harrison Streets, whereas the draft Central SoMa Plan proposes a height limit of 160 feet;
  - Block 3776: the Plan examined in the EIR includes a height limit of 115 feet on a parcel along Brannan Street, whereas the draft Central SoMa Plan proposes a height limit of ~~55~~65/85 feet;
  - ~~Block 3777: the Plan examined in the EIR includes a height limit of 130 feet on some parcels along Brannan Street, whereas the draft Central SoMa Plan proposes a height limit of 85 feet;~~
  - Block 3785: the Plan examined in the EIR includes a height limit of 160 feet along several parcels near Sixth and Townsend Streets, whereas the draft Central SoMa Plan proposes a height limit of 85 feet; and
  - ~~Block 3786: the Plan examined in the EIR includes a height limit of 250 feet at the corner of Brannan and Fifth Streets, whereas the draft Central SoMa Plan proposes a height limit of 130 feet; and~~
  - The Plan examined in the EIR includes a height limit of 300 feet on several parcels between Bluxome and Townsend Streets, whereas the draft Central SoMa Plan proposes a height limit of 130 feet.

* On Draft EIR p. II-8, the following text is added at the end of Section II.D, Plan Components, to address HSDs:

The City, through adoption of an ordinance by the Board of Supervisors, could choose to designate portions of the Central SoMa Plan Area as an HSD in accordance with AB 73. In order for a Housing Sustainability District to qualify under AB 73, the following general requirements must be met:

1. The HSD must be within 0.5 mile of public transit, or otherwise highly suitable for residential or mixed-use development;
2. The area of an individual district must not be larger than 15 percent of the city's total land area;
3. An ordinance creating the district must include procedures and timelines for review of projects;

4. At least 20 percent of all housing units constructed in the HSD must be affordable to very low–, low-, and moderate-income households for a period of no less than 55 years; and

5. The district must allow for the ministerial approval of housing projects.

The Central SoMa Plan Area meets criteria 1 through 3 above, and is anticipated to produce over 30 percent below market rate units, which would meet criterion 4. Any local ordinance creating an HSD would allow for ministerial approval of projects, satisfying criterion 5. The HSD could include all or some subset of parcels within the Central SoMa Plan Area that are zoned to permit residential use.

In order utilize the ministerial approval provisions of an HSD, an individual project would need to:

1. Include at least 10 percent units on site affordable to lower-income households (in San Francisco, all projects would still be required to satisfy Planning Code Section 415 inclusionary requirements, either through providing all inclusionary units on site, or through a combination of on-site and fee payments);

2. Meet labor standards, including prevailing wage and trained workforce requirements, if meeting certain project size thresholds; and

3. Meet any adopted design review standards, be approvable through a ministerial process and incorporate applicable mitigation measures from the EIR evaluating the HSD ordinance.

* On Draft EIR p. II-10, Figure II-3, Proposed Plan Area Use Districts, has been revised to reflect the change from MUO to CMUO zoning districts.

* On Draft EIR p. II-19, Figure II-7, Proposed Plan Area Height and Bulk Districts, has been revised to show the revised heights now proposed.

* On Draft EIR p. II-20, Figure II-8, Generalized Height Limits, Existing and Proposed Height and Bulk Districts, has been revised to show the revised heights now proposed.

* On Draft EIR p. II-22, the fifth and sixth sentences of the first paragraph of text beneath the bullet list on Draft EIR p. II-22 have been revised as follows to clarify that certain height limits less than 200 feet would apply to portions of the Plan Area and not to specific building sites:

… In addition, the Plan would allow for:

- ~~five~~ four areas with a 160-foot height limit ~~buildings~~ and ~~about half a dozen buildings~~ seven areas with a height limit of 130 feet in height in the area south of ~~Harrison Street~~ the I-80 freeway;~~, as well as~~
- a 115-foot-tall building on the northwest corner of Brannan and Ritch Streets, between Third and Fourth Streets;~~. The project would also allow for~~
- four towers of 200, 240, 350, and 350 feet on the south side of Harrison Street between Second and Fourth streets (interspersed on the north side with a height limit of 130 feet and on the south side with height limits of 130 feet and 160 feet);~~ and~~
- towers of 200 feet on the northeast corner of Third and Harrison Streets and the northwest corner of Second and Harrison streets; and~~, as well as~~
- a 300-foot tower on the southwest corner of Fifth and Howard Streets, where the Tenderloin Neighborhood Development Corporation (TNDC) has proposed a residential project.



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure II-3

Proposed Plan Area Use Districts [Revised]

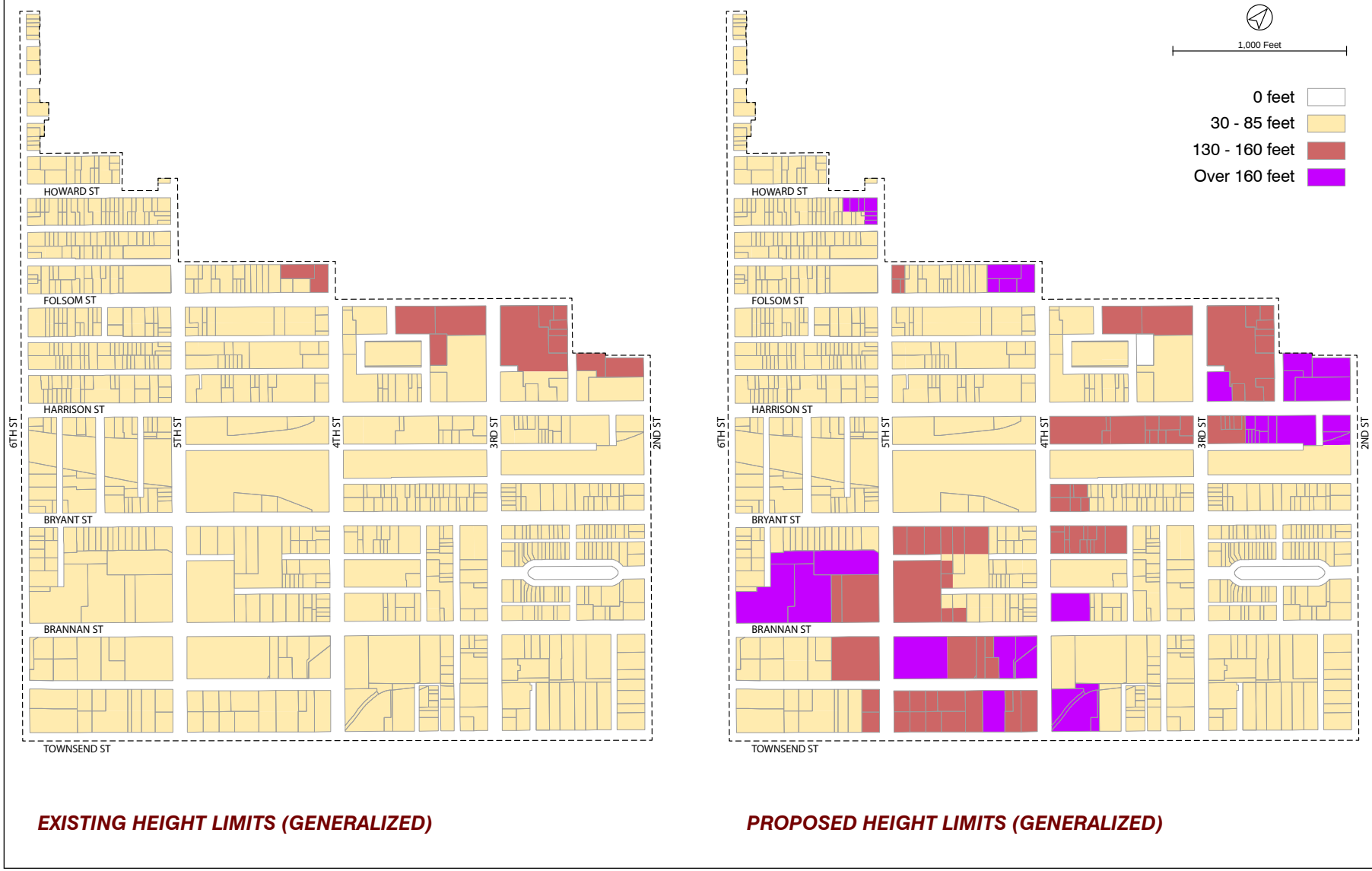


SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure II-7

Proposed Plan Area Height and Bulk Districts [Revised]



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure II-8

Generalized Height Limits, Existing and Proposed Height and Bulk Districts [Revised]

* On Draft EIR, p. II-22, the last three sentences of the first paragraph of text beneath the bullet list on Draft EIR p. I-22 have been deleted as the Draft EIR adequately analyzes growth that could occur pursuant to both the state density bonus program and that Plan's own height bonus provisions:

> … some existing lower height limits would be increased to as much as 85 feet. ~~It is noted that the Plan's proposed height districts take into considerations the State's affordable housing density bonus, as delineated in Assembly Bill 2501 Housing: Density Bonuses, approved by the Governor on September 28, 2016. As such, subsequent residential projects that could be developed under the Plan are not expected to exceed heights proposed by the Plan. The exception may be 100% affordable housing projects, which could utilize the City's affordable housing bonus program in accordance with the provisions, requirements, and limitations of that program.~~

* On Draft EIR p. II-23, the third sentence of the paragraph of text following the heading introducing Objective 8.5 on Draft EIR p. II-23 has been revised as follows to clarify that and additional 25 feet in height potentially could be granted in connection with any site where affordable housing or open space is proposed in excess of required amounts:

> … ~~For example, a~~An additional 25 feet of height would be allowed on sites where such flexibility in height would facilitate the provision of affordable housing and/or public open space beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow.

On Draft EIR p. II-35, the first paragraph has been revised as follows to clarify the location of Proposed Street Network Changes Detail Drawings:

> The street network changes described below represent major investments that would be implemented gradually over time. Reconfigurations to street operations (such as conversion from one-way to two-way operation, installation of transit and bicycle facilities, and changes in the number of travel lanes) could be initially implemented on a street-by-street or block-by-block basis using roadway striping, traffic signal modifications, corner bulb-outs, and other low-cost tools. However, sidewalk widening (and the removal of some on-street parking in order to widen sidewalks) is a more substantial capital expense, and therefore sidewalk widening is expected to be implemented gradually as funding becomes available over time. In addition, some new developments would be required to widen sidewalks in front of their respective buildings per the City's Better Streets Plan. On blocks without development opportunity sites, sidewalk widening may need to be undertaken by the City, and would have to be prioritized among other transportation funding priorities. A complete set of figures illustrating the proposed street network changes is included in Draft EIR Appendix F.

E.4 Chapter III, Plans and Policies

On Draft EIR p. III-10, the fourth sentence from the bottom of the page in the last paragraph has been revised as follows to correct an editorial error:

> … In addition, several parcels north of the I-80 freeway and east of Fourth Street would be zoned to a maximum of ~~300~~ 350 feet. …

* On Draft EIR pp. III-19 to III-20, the last two paragraphs on p. III-19 and the first two paragraphs on p. III-20 have been revised as follows to reflect changes to the "Office Development Annual Limitation (Annual Limit)

Program" inventory since publication of the Draft EIR and to address changes to the 598 Brannan Street project description and the 400 Second Street project to the inventory:

> As of January 12, 2018~~July 22, 2016~~, the Planning Department inventory of office space showed ~~less than half a million (about 444,000)~~ approximately 2.1 million square feet of space available for large projects (those 50,000 square feet and larger), with an additional ~~1.08~~1.02 million square feet available for smaller projects (25,000 to 49,999 square feet).[57] Another 875,000 square feet is added to the large project pool and another 75,000 square feet is added to the small project pool each October (the start of the Section 321 year). The 2012–2013 Section 321 year was the most active in the history of the office allocation program, with 3.6 million square feet of large projects approved (no small projects were approved); the Salesforce (formerly Transbay) Tower at 101 First Street at Mission Street represented 38 percent of this total, at 1.37 million square feet. This building is currently under construction. After a lull in 2013–2014, another 2.2 million square feet of office projects was approved in the 2014-2015 Section 321 year, including "Park Tower" (250 Howard Street) in Zone 1 of the Transbay Redevelopment Area (767,000 square feet; groundbreaking occurred in October 2015) and 633,500 square feet of office space in the 5M Project at Fifth and Mission Streets. Another 1.23 million square feet was allocated in the 2015–2016 Section 321 year, with 86 percent of that going to the 50 First Street ("Oceanwide Center") project. Only 90,000 square feet was allocated in the 2016-2017 approval period, to one large project—expansion of a building at 633 Folsom Street. As of January 2018, no office allocations had been granted in the 2017-2018 Section 321 year.
>
> As of January 2018~~ July 2016~~, the Planning Department reported eight ~~four~~ large projects with applications pending for allocation of office space totaling 5.92 ~~1.16~~ million square feet. One project, the proposed conversion of the San Francisco Design Center building at 2 Henry Adams Street from showrooms to office space (246,000 square feet; Case No. 2013.1593), was effectively denied in July 2014 when the Board of Supervisors Land Use Committee tabled a resolution designating the building a City Landmark, an action that was required to allow the office conversion. This action essentially reduced the 5.92 ~~1.16~~ million square feet of pending space as of January 2018~~ November 2015~~ to ~~910,000~~ 5.68 million square feet.
>
> Of the other ~~three~~ seven projects, three ~~two~~ are in the Plan Area and are undergoing environmental review: 2.03 million square feet of office space at 610–698 Brannan Street (the Flower Mart site; Case No. 2017-000663); a proposed ~~700,000~~ 1.2 million-square-foot ~~building in the Central SoMa Plan Area~~ development containing approximately 922,300 square feet of office use at 598 Brannan Street (Case No. 2012.0640E); and a mixed-use project including 421,000 square feet of net new office space at 400 Second Street (One Vassar Street; Case No. 2012.1384)~~ and a four-story, 89,800-square-foot addition to an existing seven-story building at 633 Folsom Street (Case No. 2014.1063)~~. The ~~fourth~~ other proposals would create some 1.8 million square feet of office space at the former Pier 70 shipyard; convert 119,600 square feet of PDR space in the San Francisco Armory at 1800 Mission Street to office use; develop approximately 289,000 square feet of office space at 542–550 Howard Street; and develop about 84,500 square feet of office space, along with PDR space, at 552 Berry Street/1 De Haro Street. (Although the Pier 70 project received several approvals in 2017, office allocations at that site will be granted on an incremental basis as development proceeds.)
>
> The large building inventory reached a maximum of just over 5.1 million square feet available at the start of the 2012–13 allocation period in October 2012. As of ~~July 2016~~ January 2018, the Planning Department has environmental or other applications on file for some ~~6.9~~ 3.79 million square feet of office space in addition to the 5.92 million square feet of pending office space. The applications on file combined with the pending office space totals more than 9.7 million square feet, which is considerably more than the ~~444,000~~ 2.1 million square feet available. The largest projects on file include

~~redevelopment of the San Francisco Flower Mart site at Sixth and Brannan Streets, within the Plan Area (approximately 2.0 million square feet), redevelopment of the bayside portion of Pier 70 (approximately 1.8 million square feet),~~ a mixed-use project at Seawall Lot 337 (the San Francisco Giants' "Mission Rock" project on Port of San Francisco Land; approximately 1.3 million square feet), which has received certain approvals but as of January 2018 has not submitted application for allocation of office space; redevelopment of the former Potrero Power Plant site, including approximately 590,000 square feet of office space; and three projects in the Plan Area: an approximately 907,000 square-foot office project at 725–735 Harrison and Fourth Street, ~~also within the Plan Area~~ 823,500 square feet of office space on the site of the San Francisco Tennis Club at Fifth and Brannan Streets, and addition of about 169,000 square feet of office space to a recently constructed building at 505 Brannan Street. There are applications on file for ~~3.8~~5.4 million square feet of office space in ~~seven~~ nine separate projects within the Central SoMa Plan Area, including ~~two~~ three small (less than 50,000 square-foot) projects. It is noted that, with approval of Proposition O in November 2016, office development at Candlestick Point and the former Hunters Point Shipyard is not subject to the annual limit on office development contained in Planning Code Section 321. This could allow for earlier approval of projects elsewhere in the City, including in the Plan Area, given that the Planning Commission had voted in 2010 to give priority in office allocations to projects in the Candlestick Point-Hunters Point project area over other office projects, except for the Salesforce Tower and projects in Mission Bay South.

Footnote:

[57] San Francisco Planning Department, "Office Development Annual Limitation (Annual Limit) Program Update," ~~July 22, 2016~~ January 12, 2018. Allocations in square feet of gross floor area, as defined in Planning Code Section 102.9. Available at http://zasfplan.sfplanning.org/ANLM/Office_Allocation_Stats.pdf, accessed ~~October 24, 2016~~ January 26, 2018.

E.5 Chapter IV, Environmental Setting, Impacts, and Mitigation Measures

* On Draft EIR pp. IV-1, the following text is added after the final complete sentence in the last partial paragraph to further clarify the differences between the 2013 Plan and the 2016 Plan as they were analyzed in the Initial Study and the Draft EIR, respectively:

> … Because the area of effect became more limited, the proposed zoning and height options became more focused, and the proposed regulations more stringent and exacting than the 2013 draft Plan, the differences between the two Plans would not result in new effects or more severe physical environmental impacts than those disclosed in the Initial Study, as discussed further below.

Differences Between the 2013 Plan and the 2016 Plan

The following discussion examines the differences between the goals contained in the 2013 and 2016 Plans, as well as the differences between the geographic area covered by each Plan and the differences in growth projections as set forth in the Initial Study and the Draft EIR.

Difference Between Plan Goals Set Forth in the EIR and Initial Study

In terms of Plan goals, the comments inaccurately state that the "DEIR Project Has Entirely Different Goals than the Initial Study." The same underlying concepts and principles support both the 2013 and 2016 Plans, and the current draft Plan, which proposes to "accommodate growth, provide public benefits, and respect and enhance neighborhood character" (2016 Plan p. 5) is a refinement of the 2013

Plan, which aimed to "support transit-oriented growth" (2013 Plan Goal 1) while "respecting the rich context, character and community of SoMa, providing benefits for its existing residents and workers as well as the services needed for new ones, and growing sustainably" (2013 Plan p. 6). **Table IV-a, Comparison of Goals, 2013 and 2016 Plan Drafts [New]**, compares the goals of the 2013 and 2016 draft Plans side-by-side, along with explanatory text from each plan. While the precise wording and the order in which the goals are presented has changed between the 2013 Plan and the 2016 Plan, there is strong concordance between the objectives that support each draft of the Plan.

TABLE IV-A COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS [NEW]

2013 Plan	2016 Plan
Goal 1: Support transit-oriented growth, particularly workplace growth, in the central corridor area. The Central Corridor area lies just south of Market Street, San Francisco's main drag, adjacent to existing centers of commerce, housing, and visitor activity in Downtown and Mission Bay. It is linked regionally and locally by a strong and diverse transportation network including BART, Caltrain, MUNI and the coming Central Subway. And it is already an area of demonstrated demand, in a part of SoMa that has seen more growth and economic activity than any other city neighborhood in the last ten years. From a location, transit, and market demand perspective, it is a logical growth center. Allowing a wide and flexible range of uses, increasing allowed densities, and strategically raising height limits are the Plan's key strategies to enable increased development potential. However, any increases in development capacity need to be balanced with other Plan goals - respecting the rich context, character and community of SoMa, providing benefits for its existing residents and workers as well as the services needed for new ones, and growing sustainably. [p. 6]	**Goal 1: Increase the Capacity for Jobs and Housing** Central SoMa is an appropriate location for such development. The area is served by some of the region's best transit, including BART and Caltrain, Muni Metro and many bus lines, in addition to the Central Subway currently under construction. Flat streets and a regular grid pattern can make destinations easy to reach for people walking and bicycling (as facilitated by improvements discussed in Goal 4). There is already an incredibly strong cluster of technology companies that new and growing companies want to locate near. There is also a diversity of other uses, including thousands of residential units, local- and regional-serving retail, cultural and entertainment facilities, hotels, and production/distribution/repair businesses. Simultaneously, there is substantial opportunity to increase density in Central SoMa. There are numerous undeveloped or underdeveloped sites, such as surface parking lots and single-story commercial buildings. [p. 13] **Goal 3: Facilitate an Economically Diversified and Lively Jobs Center** Moving forward, Central SoMa is also well positioned to be a center for job growth. As discussed in Goal #1, it is well located, being served by some of the region's best transit and having a lot of developable land. Much of that demand will be for office-oriented jobs, particularly in the "knowledge-sector" industries that drive our economy. However, in allowing for that growth it is important that the neighborhood maintains and grows its other sectors to sustain its unique diversity of economic activities and the liveliness that SoMa is known for. [p. 35]
Goal 2: Shape the area's urban form recognizing both city and neighborhood contexts. As noted above, the Central Corridor area plays a significant role as a job hive, cultural center, and transit nexus in our city, but it also is a unique place with a rich history and a fabric of diverse buildings and mix of activities that give it its local and international dynamism. Famous for its brawny warehouses, eclectic mix of commercial buildings from throughout the 20th Century and fine-grained alleys, growth should reflect this character while accommodating the broader growing needs of tomorrow and the next generation. Urban design provides a tool to address overall neighborhood livability and character, particularly regarding the scale of the streetwall, lot fabric, sunlight to open space, and historic resources. This Plan sets forth a proposal for a mostly mid-rise district, based on an overall base height set by the width of the area's streets. The Plan uses a number of urban design	**Goal 8: Ensure that New Buildings Enhance the Character of the Neighborhood and the City** While many existing residential, historic, public, and large commercial buildings in Central SoMa are likely to remain in the foreseeable future, there is also a substantial amount of land on which new development is likely to occur. New buildings and landscapes will change the neighborhood in many ways. The design of ground floors can control how interesting and safe a street will be for people walking. The size and massing of buildings as perceived from the street can be inviting if scaled appropriately, alienating if too small or too far removed, or intimidating if too large, looming or impervious. The collection of the buildings as viewed from the distance can either enhance or detract from the overall skyline and sense of the city's landscape. The architecture of a building can either engage people with intimate details and support a feeling of a cohesive and

TABLE IV-A COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS [NEW]

2013 Plan	2016 Plan
strategies, from lowering heights to preventing lot mergers, to protect assets like existing open spaces, residential enclaves, small-scale neighborhood commercial clusters and historic districts. [p. 6]	dynamic neighborhood or only coolly express its own internal interests without enriching its context. Within the existing neighborhood, there are already numerous good and bad examples for each of these issues. The goal of the Central SoMa Plan is to ensure that each new building enhances the character of the neighborhood and the city as a whole by having engaging ground floor, appropriate scale, great architecture and a beneficial contribution to the skyline. [p. 95] Note: Objective 8.3 reads, "Reinforce the character of Central SoMa as a mid-rise district with tangible 'urban rooms.'"
Goal 3: Maintain the area's vibrant economic and physical diversity. SoMa is one of the most vibrant areas of the city. The Central Corridor Plan Area incorporates an incredibly diverse cross-section of San Francisco's population, uses and buildings. Within the Plan Area there are multiple mini-neighborhoods where one use might be more predominant than others, numerous communities with longstanding heritage in the area, and a wide range of residents, from singles to families, at a range of incomes. A key goal of this Plan is to maintain this vibrancy through land use strategies that support and build upon existing diversity, by protecting existing residential areas from major change or displacement, by fostering the continued mix of uses – offices, housing, retail, hotels, industrial, and entertainment -- sitting side by side, by preserving important historic buildings, and guiding the sensitive design of new ones. [p. 7]	**Goal 2: Maintain the Diversity of Residents** SoMa has an incredibly diverse population, in terms of race, income, and unit size. This diversity is a critical part of its neighborhood character. Respecting this neighborhood character requires that the variety provided by the existing residents should be maintained, and that future development would replicate this pattern to the highest degree possible. [p. 27] **Goal 3: Facilitate an Economically Diversified and Lively Jobs Center** SoMa has been a commercial center for San Francisco for well over a century. Historically an industrial district, such businesses now sit cheek by jowl with offices, retail, hotels, and entertainment venues. This combination creates an environment that is both incredibly lively and unique in San Francisco. [p. 35]
Goal 4: Support growth with improved streets, additional open space, and other elements of "complete communities." The healthiest kind of neighborhood is one where people can live, work, move, and thrive. As a neighborhood that has been in transition for a number of years, SoMa still lacks many of the kinds of services and amenities that would make it a truly "complete" community for its residents and workers. For example, the Central Corridor area is currently served by a diverse set of public open spaces and facilities, particularly surrounding Yerba Buena Gardens. But the uneven distribution of these community assets leaves portions of the area underserved, and the Plan proposes a number of strategies to provide new public open space. Its large blocks, poor pedestrian conditions, few biking facilities and fast moving traffic are proposed to be transformed into complete streets that support walking, biking, and transit, and function as a welcoming component of public realm. In addition to public realm and circulation improvements that address the area's needs for physical infrastructure, the Plan also includes consideration of programs that can enhance access to community services, affordable housing and work opportunities. Impact fees will fund not just open space and street improvements, but also child care and library facilities. Increased housing requirements will expand the amount of affordable housing in the area, and citywide economic development tools will help broaden access to the area's jobs. [p. 8]	**Goal 5: Offer an Abundance of Parks and Recreational Opportunities** Central SoMa currently suffers from a shortage of public parks and recreational opportunities relative to number of residents, workers and visitors to the area. This is largely due to its industrial history. Within the Plan Area there is only one outdoor recreational space: South Park. There are also smaller indoor and outdoor passive spaces as well as private indoor gyms. There are also three large public facilities just outside the Plan Area that serve the people of Central SoMa: Yerba Buena Gardens, Gene Friend Recreation Center, and Victoria Manalo Draves Park. Given the superior public transit in Central SoMa, area residents have access to a broad range of other recreational opportunities in the city. However, given the length of blocks and limited number of facilities, substantial portions of the Plan Area lack easy access to playgrounds, public sports courts, and quiet spaces for more contemplative activities. By increasing the population in Central SoMa, the need for parks and recreational opportunities will only increase. Fortunately, the Central SoMa Plan presents an excellent opportunity to build new parks and recreational facilities, provide the funding to maintain them, and the activity to keep them well used. Seizing these opportunities will require dedicated and strategic focus. [p. 59] **Goal 4: Provide Safe and Convenient Transportation that Prioritizes Walking, Bicycling, and Transit** Central SoMa is served by a widely spaced grid of major streets that form large blocks, often subdivided by narrow streets and alleys in

TABLE IV-A COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS [NEW]

2013 Plan	2016 Plan
	patterns that vary from block to block. While the narrow streets and alleys typically serve only very local needs, the continuous grid of major streets connects city neighborhoods and links the city to the region via I-80, I-280 and U.S. 101. The major streets in SoMa have multiple lanes, widely spaced traffic signals, and are often one-way – all strategies to move automobiles and trucks through the district at rapid speeds. While the existing street pattern still works for traffic circulation in off-peak hours, as traffic congestion has worsened over the decades, these streets are now often snarled with automobiles, trucks, transit, and taxis/ridesharing services. The resulting traffic is a substantial source of air and noise pollution and disproportionate rates of traffic injury, degrading the quality of life for residents, workers and visitors to the area. Whether at congested times or not, the present design of the major streets does not serve pedestrians well and will certainly not accommodate the pedestrian needs of the new residents, workers and visitors contemplated by this Plan. Design that primarily accommodates the needs of motor vehicles relegates the needs of people walking to a secondary status. The result is unsafe and unpleasant conditions for pedestrians: many sidewalks do not meet minimum city standards; signalized or even marked crosswalks are few and far between; many crosswalks at major intersections are closed to pedestrians; and long crossing distances increase exposure to traffic. The combination of high traffic speeds and volumes and poor pedestrian infrastructure is reflected in the high rate of pedestrian injuries seen throughout the Plan Area. The existing conditions are also quite poor for people riding bicycles, and discourage others from cycling in this neighborhood. On most streets, bicycles are expected to share lanes with much heavier and faster moving motor vehicles. Where bicycle lanes exist, they place cyclists between moving traffic and parked cars and do not protect cyclists from right-turning vehicles at intersections. Insufficient facilities for people riding bicycles are reflected in the high rate of injuries to bicyclists seen throughout the Plan Area. [p. 43]
Goal 5: Create a model of sustainable growth. At the same time that new growth adds demand to our water, energy and waste systems, state and local environmental goals mandate that we reduce greenhouse gas emissions, energy use and stormwater output. Eco-Districts provide a way of looking at water and energy conservation and waste reduction on a neighborhood or district level, by bringing neighbors, community institutions, and businesses together with the public sector to develop innovative projects to reduce the ecological footprint of the neighborhood. A pilot Eco-District in the Central Corridor can illustrate how a significant rezoning effort can be linked to sustainable growth. Several of the components planned for the Central Corridor can support Eco-District development – new infrastructure in the area can be designed to assist in achieving energy, water or ecosystem goals; new buildings can be designed to the highest level of environmental sustainability; and eco-friendly behavior can be supported by the Plan Area's new uses, improved streets, and new communities. [p. 8]	**Goal 6: Create an Environmentally Sustainable and Resilient Neighborhood** Central SoMa is poised to become a truly sustainable (healthy, green, efficient), resilient, and regenerative neighborhood—an "Eco-District" where urban development gives more to the environment than it takes. In such a community, buildings use 100 percent greenhouse gas-free energy (much of it generated within the neighborhood); carbon emissions and fossil fuels are completely eliminated; non-potable water is captured, treated, and re-used within the district to conserve potable water and eliminate waste; nature is a daily experience, with greening and biodiversity thriving on streets, buildings, and parks; and zero solid waste is sent to the landfill. To achieve this bold vision, the Central SoMa "Eco-District" is committed to advancing livability and environmental performance through innovative and neighborhood-scale systems, projects, and programs. Creative partnerships between residents, organizations, businesses, and government entities help ensure sustainability targets are achieved and progress is tracked over time. The results will be palpable to the daily experiences of people living, working,

TABLE IV-A COMPARISON OF GOALS, 2013 AND 2016 PLAN DRAFTS [NEW]

2013 Plan	2016 Plan
	and visiting the neighborhood, and will place Central SoMa at the forefront of action on global climate change. [p. 69]
Chapter 6 – Historic Resources & Social Heritage SoMa has developed an eclectic mix of commerce, industry, and increasingly, entertainment and residential living spaces. Within this diverse mix of land uses, SoMa and the Central Corridor Area is distinguished by the existence of individually significant properties. Within the Central Corridor Area Plan there are a number of City Landmarks, generally in the northern edge of the Plan Area, including St. Patrick's Church (Landmark No. 4), the Jessie Street Substation (Landmark No. 87), and the Old U.S. Mint (Landmark No. 236), and one locally-designated historic district, the South End Historic District. Various other significant properties and districts relating to the Filipino and gay "leather" communities have been identified through informational surveys and inventories within the boundaries of the Central Corridor Plan Area. The Plan Area's built fabric, and the social role of those buildings, play a key role in its unique character. The historic preservation objectives and policies of the Central Corridor Plan provide for identification, retention, reuse, and sustainability of these unique properties. As the area changes and develops, historic features and key properties that define it should not be lost or their significance diminished through demolition or inappropriate alterations. New construction in designated historic districts should respect and relate to their contexts. The Plan supports sound treatment of historic resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, encourages rehabilitation of resources for new compatible uses, and it allows for incentives for qualifying historic projects. [p. 82]	**Goal 7: Preserve and Celebrate the Neighborhood's Cultural Heritage** SoMa has … developed an eclectic mix of commerce, industry, and increasingly, entertainment and residential living spaces. Within this diverse mix of land uses, there are historically and culturally significant properties and districts. SoMa is an important center for two culturally important communities: Filipinos and the lesbian, gay, bisexual, transgender, and queer (LGBTQ) community. SoMa is home to the largest concentration of Filipinos in San Francisco, and is the cultural center of the regional Filipino community. The Filipino community has deep roots in the neighborhood, beginning in the 1920s and becoming a predominant presence in the 1960s. The LGBTQ community also has a long-standing presence in SoMa. By 1956, the two most prominent national organizations dedicated to improving the social status of gays and lesbians were both headquartered within the Central SoMa. Beginning after World War II and to present day, various LGBTQ-oriented business establishments have located to SoMa's industrial areas. The Plan Area's cultural heritage is a valuable historical, social, and economic resource that requires thoughtful management to safeguard the city's unique identity and to ensure a high quality-of-life for its current and future inhabitants. Retaining the city's architectural heritage builds an inimitable sense of place and a tangible connection to its past. Sustaining the traditions, businesses, arts, and practices that compose San Francisco's social and economic fabric preserves experiences that can be shared across generations. And, protecting the city's archeological sites and artifacts provides increasing insight into the story of its past inhabitants. Conservation of our cultural heritage encourages a deeper awareness of our shared and multi-faceted history while facilitating sustainable economic development. As the area changes and develops, key elements of the historic built environment should not be lost or diminished through demolition or inappropriate alterations. The City supports preservation and sustainable rehabilitation of historic resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties and encourages the introduction of new compatible uses, and allows for preservation incentives for qualifying projects. Moreover, new construction in identified historic districts should respect and relate to its architectural context. The City also supports stabilization, promotion, and increased visibility of the area's living heritage, which includes businesses, organizations, traditions, and practices associated with the Filipino and LGBTQ communities. [p. 84]

As shown above, the 2016 Plan merely repackages and rewords the primary goals of the 2013 Plan. The overall intent of the Plan goals, as they may relate to physical environmental effects, remains the same. The change in the wording of Plan goals between publication of the Initial Study and publication of the Draft EIR does not result in any inadequacy in either document, does not set forth substantial new information, and does not require recirculation of either the Initial Study or the Draft EIR.

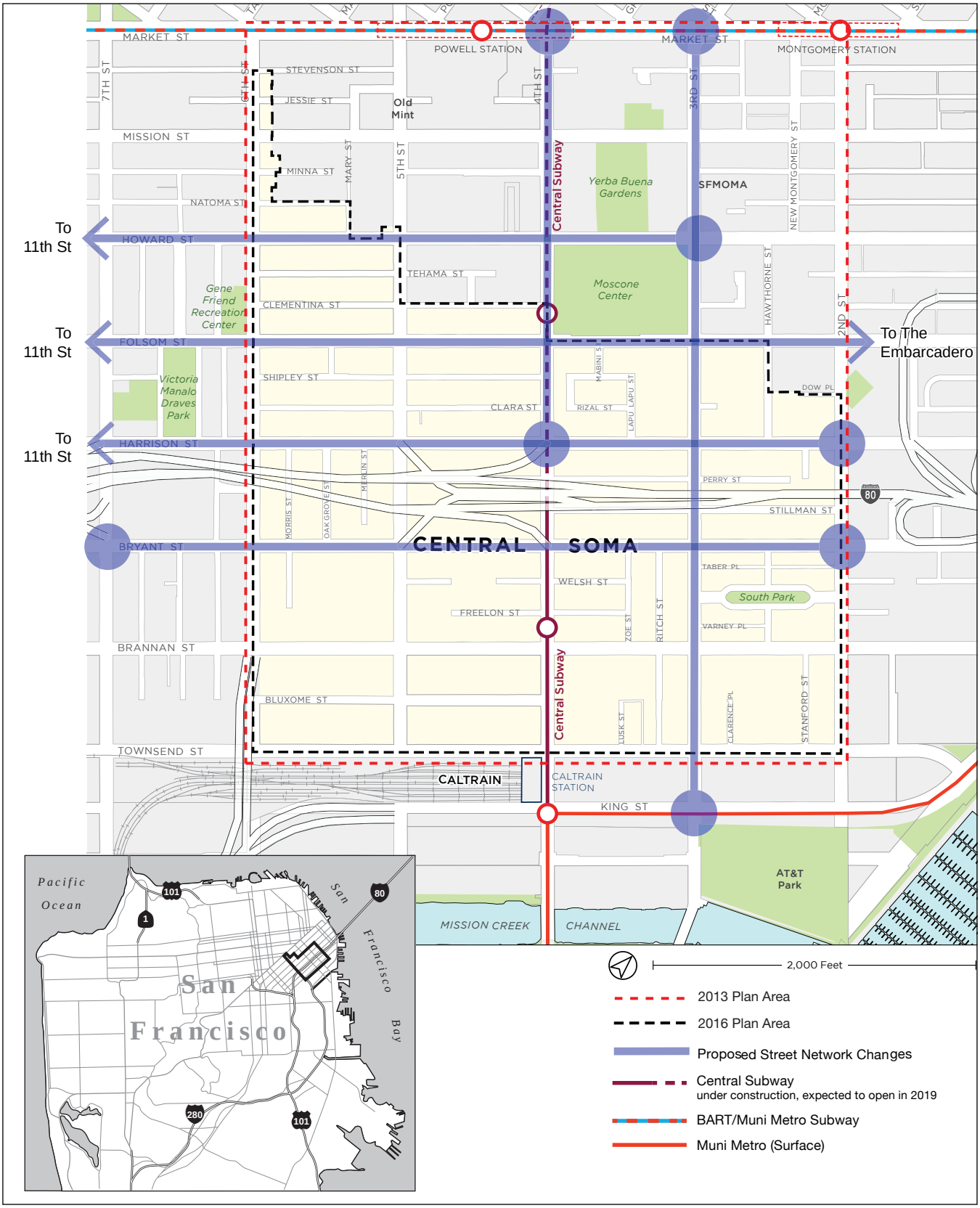
Difference in the Geographic Area of the Plan Between the Draft EIR and Initial Study

As noted in the comments, the 2013 draft Central Corridor Plan analyzed in the Initial Study encompassed the 28-block area from Market Street south to Townsend Street, between Second and Sixth streets. As currently proposed and as set forth in the Draft EIR, the 2016 draft Central SoMa Plan includes all or parts of 17 city blocks bounded by Second Street on the east, Sixth Street on the west, Townsend Street on the south, and an irregular border that generally jogs along Folsom, Howard, and Stevenson streets to the north. The change in geographical extent between the 2013 Plan and the 2016 Plan equals the removal of about 35 percent of the 2013 Plan at its northernmost portion.

The areas within the 2016 Plan are all part of the Eastern Neighborhoods Plan Area (including East SoMa and Western SoMa). By contrast, the areas removed from the 2016 Plan are outside of the Eastern Neighborhoods Plan Area, the vast majority of which are in the Downtown Plan Area and zoned one of four C-3 (Downtown Commercial) Use Districts. The exceptions include five parcels near the northwest corner of Fifth and Howard streets;[135] a single large parcel zoned RC-4 (Residential-Commercial, High-Density) in the block bounded by Howard, Fourth, Folsom, and Fifth streets; and two sites zoned for P (Public) use—the Old Mint at Fifth and Mission streets and the Fifth and Mission Parking Garage.

Under the 2013 Plan, none of the parcels outside of the Eastern Neighborhoods Plan Area were proposed for rezoning to a different use district, with the exception of the RC-4 parcel, occupied by three affordable housing buildings owned and operated by TODCO and the Tenderloin Neighborhood Development Corporation, which was proposed for rezoning to C-3-S (Downtown Commercial Support) for consistency with the surrounding area. However, this zoning revision was not anticipated to result in any physical change or change in use, given that TODCO's mission is the provision of affordable housing and enhancing socioeconomic conditions for the poor, disadvantaged, and working-class people in SoMa. Moreover, should this site be sold in the future, the regulatory constraints to removal or demolition of affordable residential units in San Francisco would limit potential changes. Moreover, no changes in height limits were proposed under the 2013 Plan on any of the parcels now no longer within the 2016 Plan Area, save for a decrease in height limit that had been proposed on the blocks occupied by the Moscone Convention Center. Accordingly, while the Initial Study analyzed physical effects of development subsequent to the Plan in the approximately 30-acre area that is no longer included in the 2016 Plan, the 2013 Plan would not have substantially increased the foreseeable amount of development in this area because the 2013 Plan did not propose changes to use districts or height limits that would have the potential to increase the projected amount of development and this development could occur pursuant to existing zoning, whether or not the Plan is adopted. It is for these reasons that the Plan Area boundaries were modified in the 2016 Plan. The adoption of the 2013 Plan would not have facilitated any additional development that could not already occur on the parcels removed from the Plan Area (see **Figure IV-1, Revision to Plan Area Boundaries [New]**).

[135] These parcels, within a RSD (Residential/Service Mixed) Use District at the time the Initial Study was published, have since been rezoned to C-3-S (Downtown Commercial Support) as part of approval of the 5M Project (Case No. 2011.0409).



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure IV-1

Revision to Plan Area Boundaries [New]

In light of the foregoing, the geographical change in the Plan Area between publication of the Initial Study and publication of the Draft EIR does not result in any inadequacy in either document, does not set forth substantial new information, and does not require recirculation of either the Initial Study or the Draft EIR.

Difference Between the Draft EIR and the Initial Study Growth Projections

As discussed in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, under Approach to Analysis on p. IV-5, and elsewhere in the Draft EIR, the Plan is a regulatory program, not a physical development project or set of development projects (other than changes to streets and potential open space improvements). The Plan, if adopted, would allow for accommodation of additional jobs and housing in the Plan Area, but would not result in direct physical changes. To analyze the potential indirect physical effects of a regulatory program, it is necessary to develop a set of reasonable assumptions concerning the future physical development that could be constructed under the proposed Plan. This is then compared with future development that could be constructed under the existing zoning and land use policies in the Plan Area. These assumptions are set forth in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, under Analysis Assumptions and Growth Assumptions beginning on Draft EIR p. IV-4. These assumptions are not part of the description of the proposed Plan; rather, they are the basis of the analysis of several Draft EIR topical sections, particularly those that require quantification of impacts related to the intensity of development, such as Transportation and Circulation, Noise and Vibration, and Air Quality, as well as the analysis in the Hydrology section of combined sewer discharges as a result of increases in Plan Area wastewater generation. Each of these issues was analyzed in the Draft EIR. Other topics that incorporate quantification related to the intensity of development that were analyzed in the Initial Study include Recreation, Utilities and Service Systems, and Public Services.

As described on Draft EIR p. IV-5, the Draft EIR growth forecasts are based on the Planning Department's citywide allocation of Association of Bay Area Governments' (ABAG) growth projections. The ABAG projections are developed as part of the regional planning process undertaken by ABAG and the Metropolitan Transportation Commission (MTC) in preparation of Plan Bay Area, which is the Bay Area's Sustainable Communities Strategy (prepared consistent with Senate Bill 375 [2008]), as well as the regional transportation plan. The Planning Department allocates the regional growth forecasts to 981 Traffic Analysis Zones (TAZs)[136] in San Francisco, accounting for already anticipated growth and allocating residual ABAG-forecast growth based on factors including development capacity and existing development patterns, as well as proposed changes such as the Plan. These growth forecasts are provided by the Planning Department to the San Francisco County Transportation Authority for use in the San Francisco Chained Activity Modeling Process (SF-CHAMP) travel demand model, the output from which serves as the basis for the Plan transportation analysis.[137]

As shown in **Table IV-b, Comparison of Growth Projections, Draft EIR and Initial Study [New]**, the growth forecasts used in the Draft EIR are larger than those presented in the Initial Study. The reason for this is two-fold. First, as explained in footnote 3 on Draft EIR p. IV-5, subsequent to publication of the Initial Study, Plan development assumptions were modified to add development capacity to a portion of Assessor's Block 3778 (bounded by Bryant, Fifth, Brannan, and Sixth Streets, the location of the San Francisco Flower Mart) and to allow for additional housing on Block 3732, at Fifth and Howard Streets. The change on Block 3778 is anticipated to allow for approximately 4,500 mostly office jobs

[136] TAZs are the smallest geographic units of measurement associated with existing job and household counts.

[137] The SF-CHAMP model is discussed in detail in Section D.7, Transportation and Circulation, of this Responses to Comments document, notably in Responses TR-2 and TR-3.

(about 960,000 sq. ft. of built space) beyond the amount of development previously assumed, while the change on Block 3732 is anticipated to accommodate up to approximately 430 units of affordable housing, or about 400 more units (about 480,000 sq. ft.) than previously assumed. In addition, development forecasts were adjusted to move the approved 5M Project and the under-construction Moscone Center Expansion from Plan-induced growth to cumulative and cumulative-with-Plan growth, which resulted in a change in the No Project growth forecasts. (The 5M and Moscone Center Expansion projects were moved to the cumulative analysis because they had undergone their own project-specific environmental review and are not dependent upon the Central SoMa Plan's proposed zoning.) These changes were made by the EIR transportation consultants by manually adjusting the SF-CHAMP output to account for the changes.

The second factor in the Draft EIR forecasts being larger than those in the Initial Study is because of a difference in the methodology by which the forecasts were prepared. As stated above, the Draft EIR's growth forecasts were derived from the Planning Department's citywide growth forecasts that, in turn, are based on the ABAG regional housing and employment growth projections. The Department allocates the regional growth forecasts within San Francisco. In contrast, the growth forecasts reported in the Initial Study relied upon a related but slightly different forecasting process by the Department that was specific to what was then the Central Corridor Plan Area. That approach considered development capacity given the existing and proposed zoning, identified specific sites with realistic potential as development sites, and accommodated known entitled and reasonably foreseeable projects. The difference in the two forecasting approaches (prior to the addition of added growth on Blocks 3778 and 3732) amounted to approximately 6 percent more residential growth (of the total of 9 percent shown in Table IV-b) and about 5 percent more job growth (of the 13 percent shown in Table IV-b).

TABLE IV-B COMPARISON OF GROWTH PROJECTIONS, DRAFT EIR AND INITIAL STUDY [NEW]

	Baseline (2010)	Central SoMa Plan (2040)		Percentage Difference[b]
		EIR	Initial Study[a]	
Housing Units (Total)	**7,800**	**22,300**	**21,000**	**6%**
Change from Baseline	—	14,500	13,200	10%
Households (Total)[c]	**6,800**	**21,200**	**20,000**	**6%**
Change from Baseline	—	14,400	13,200	9%
Population (Total)[d]	**12,000**	**37,500**	**35,400**	**6%**
Change from Baseline	—	25,500	23,400	9%
Employment (Jobs) (Total)	**45,600**	**109,200**	**101,900**	**7%**
Change from Baseline	—	63,600	56,400	13%

SOURCE: San Francisco Planning Department, 2016; Fehr & Peers, 2015.

NOTES:

Numbers rounded to nearest 100; some columns and rows do not add due to rounding.

a. Initial Study projections are for what was at that time identified as the High-Rise Option (Option B), the more intensive of two options.

b. Percentage difference is the amount by which Draft EIR growth forecasts exceed those in the Initial Study.

c. Assumes 87 percent occupancy rate for 2010 Baseline based on 2010 Census; assumes a 95 percent future occupancy rate.

d. Assumes 1.77 persons per household.

The added growth on Blocks 3778 and 3732 and the different forecasting approaches used explain why the growth projections are slightly different, although as can be seen in Table IV-a, the overall totals

differ by no more than 7 percent and the increment from existing (baseline) conditions varies by 6 to 13 percent.

The growth projections in both the Draft EIR and the Initial Study attribute growth within the entirety of the original Plan Area as described in the 2013 Plan and in the Plan's Initial Study. That is, both growth forecasts assume that development in the area that was removed from the 2013 Plan Area would be attributable to the Plan. As stated on p. IV-6 of the Draft EIR in the notes of Table IV-1, Summary of Growth Projections, the reason why the growth forecasts for the Draft EIR were not modified based on the revised Plan boundaries was because 95 to 97 percent of the projected growth in residential and employment uses attributable to the 2013 Plan would occur within the 2016 Plan Area boundaries. Furthermore, as stated above, in fact, this development would occur regardless of whether the 2016 Plan (or the 2013) is adopted because growth projected for this area could occur under existing conditions and neither version the Plan would increase the potential foreseeable development in this area. Therefore, both sets of growth forecasts are conservative with respect to the potential development that could occur under the Plan.

Concerning other growth forecasts cited in the comments, those from the Central SoMa Plan describe only anticipated growth from the Plan within the revised Plan Area (without the removed parcels at the northern portion of the 2013 Plan Area). As explained above, the Draft EIR conservatively includes the removed parcels in its analysis. The Draft EIR also conservatively assumes more workers per square foot than assumed in the financial analysis prepared for the Plan; thus, the EIR errs toward overestimating rather than underestimating environmental impacts related to employment growth. It is noted that the Draft EIR does not consider the financial analysis as part of its environmental analysis.

Because the Planning Department's citywide growth allocation, derived from ABAG and MTC regional projections and used in the Draft EIR transportation analysis was greater for the Plan Area than the Department's Plan-specific growth forecasts, and because—as described in detail below—the Initial Study's analyses were largely qualitative, it was determined that the Draft EIR should rely on the higher growth forecasts to achieve internal consistency between the transportation analysis and other portions of the Draft EIR. The growth estimates used in the Draft EIR mean that the Draft EIR analyzed about 15 percent more housing units than the Planning Department currently estimates would actually be developed under the proposed Plan. By using higher growth estimates (compared to the Initial Study, the 2016 Plan, or the financial analysis), the Draft EIR provides a conservative analysis based on a reasonable "worst-case" scenario so as to not underestimate potential physical environmental impacts of the Plan.

The commenters' focus on these small differences in growth projections appears to be based on an expectation that the projections used for the Draft EIR must achieve a level of precision that is neither feasible nor required under CEQA. As discussed above, population and employment growth projections involve numerous assumptions about future economic and social conditions, which results in a fairly wide margin of error. It is because of this unavoidable margin of error that projections developed for different purposes (e.g., financial analysis vs. environmental review) incorporate different assumptions to provide reasonably conservative analyses as appropriate for their intended purposes. For example, in response to the inherent uncertainty about future economic conditions, it is good practice to err on the side of underestimating employment growth for financial analysis to reduce the chance that future payroll tax revenues are not significantly lower than anticipated. It is also good practice to err on the side of overestimating employment growth for environmental review to reduce the chance that impacts on transit demand are not adequately mitigated. Thus, the commenters' observation that the employment growth projections used for the Draft EIR are higher than the projections used for the financial analysis does not reveal a flaw requiring recirculation of the EIR as

claimed. On the contrary, this difference demonstrates that the Draft EIR provides a reasonable worst-case analysis that accounts for the uncertainty inherent in projecting future growth as appropriate under CEQA.

CEQA does not require the growth projections used to support the analysis of potential physical environmental impacts in the Draft EIR to achieve the level of precision demanded by the commenters. As stated in CEQA Guidelines Section 15151, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." In light of the uncertainties inherent in predicting future economic and social conditions, the growth projections used in the Draft EIR meet the required standard of what is reasonably feasible.

Analysis of Changes to the Plan for Topics Covered in the Initial Study

As can be seen in Table IV-b, the growth forecasts relied upon in the Draft EIR are greater in magnitude than those discussed in the Initial Study. (As noted above, the forecasts also include growth in the parcels removed from the original Plan Area.) The Draft EIR presented the bulk of the quantitative analysis of growth anticipated to be induced by Plan approval, including the topics of Transportation and Circulation, Noise and Vibration, Air Quality, and Hydrology (cumulative analysis of potential effects on discharges from the city's combined sewer system, which is based on a quantitative analysis of Plan Area wastewater generation). The Draft EIR also includes analyses of several topics for which the analysis is not based on quantification of population and employment growth, but rather is a function of changes in policy language and zoning controls (Land Use and Land Use Planning) or is a function of the location, footprint, and/or height and massing of anticipated development (Aesthetics, Cultural and Paleontological Resources, Wind, Shadow, Hydrology [risk of flooding]). Regarding the comment seeking clarification regarding the differences in impacts from those analyzed in the Initial Study with respect to traffic, air quality, and pedestrian safety, these issues were analyzed in the Draft EIR, not in the Initial Study, so there is no potential for differences in impacts from those presented in the Initial Study.

For the most part, the issues analyzed in the Initial Study were evaluated qualitatively and do not rely on quantification of population and employment growth; instead, they are a function of changes in policy language and zoning controls (Greenhouse Gas Emissions and Energy) or are a function of the location, footprint, and/or height and massing of anticipated development (Biological Resources, Geology and Soils, Hydrology and Water Quality (except for combined sewer discharges noted above), Hazards and Hazardous Materials, Mineral Resources, and Agriculture and Forest Resources). For each of these issues, the analysis in the Initial Study is not affected by the population and employment forecasts; rather, it is derived from the location of development. Therefore, the Initial Study's analysis of the above topics remains valid and, because it assumes development on the parcels removed from the original Plan Area, is also conservative.

There are four topic areas evaluated in the Initial Study that include population and employment forecasts as part of their assessments: Population and Housing, Recreation, Utilities and Service Systems, and Public Services. The following analysis evaluates the potential environmental effects to these resource topics using the Draft EIR's growth projections.

Population and Housing

The Initial Study finds that the Plan would result in less-than-significant impacts on population and housing. The Plan would not stimulate new population or job growth within San Francisco that is not already projected to occur by regional growth forecasts and regional air quality planning efforts. As stated on Draft EIR p. I-9, the Plan Area is located with the Eastern Neighborhoods and Downtown-Van Ness-Geary Priority Development Areas that are specified in Plan Bay Area, the Bay Area's Sustainable Communities Strategy. Thus, the Plan seeks to accommodate already-forecast growth in a part of the city that is easily accessible by transit, thereby contributing to a reduction in greenhouse gas emissions, compared to the same amount of development in a less-transit-accessible location. As stated in Draft EIR Table IV.D-4, Summary of Mode of Travel for Central SoMa—Weekday PM Peak Period—Existing and 2040 Cumulative Conditions, p. IV.D-35, 30 percent of p.m. peak-hour travel in Central SoMa is currently by transit, and this percentage would increase to 32 percent by 2040 with Plan implementation. This compares to a 12 percent transit mode share for travel to work for the Bay Area as a whole.[138] This conclusion that the Plan would not stimulate new unplanned growth remains valid and, in fact, becomes incrementally stronger, based on the greater growth forecasts presented in the Draft EIR. The Initial Study finds that the Plan would not generate housing demand beyond forecasts of projected housing, because San Francisco has already planned for a large increase in housing units, both within and outside the Plan Area. As stated on Initial Study p. 85, Plan-generated housing demand represents roughly 19 percent of the approximate 106,000-unit increase in housing units projected for the city through 2040. This conclusion, too, remains valid with the greater growth forecasts presented in the Draft EIR, given that, compared to the projections in the Initial Study, projected housing unit growth has increased by nearly the same percentage as projected job growth (10 percent versus 13 percent), meaning that the relative increase in jobs and housing units in the Plan Area would be essentially the same as assumed in the Initial Study analysis. Moreover, the 2016 Plan's forecast growth of 14,500 housing units and 63,600 jobs would remain within the population and employment forecasts contained in Plan Bay Area, the region's Sustainable Communities Strategy. Finally, the Initial Study finds that the Plan would not displace a large number of housing units or require construction of replacement housing. This conclusion also remains valid when considering the greater growth forecasts presented in the Draft EIR because the Plan does not anticipate removal of substantial numbers of existing housing units, which is strictly regulated and highly discouraged under Planning Code Section 317, as discussed in Response OC-1, p. RTC-248. To the extent that any existing housing units are anticipated to be removed, the Plan anticipates that they would be replaced with a larger number of new dwelling units.

Recreation

As described both in the Initial Study and the Draft EIR, the Plan proposes a number of new park and open space facilities. The projected increase of 7,300 jobs from growth reported in the Initial Study would be a daytime population that could use the recreation and open spaces during break or lunch times. However, the Plan requires office uses to provide open space such that any increase in daytime population demand is likely to be offset by an increased number of privately owned public open spaces. Regarding the residential population, the increase of 2,100 residents from growth reported in the Initial Study would represent 6 percent more growth. However, the Initial Study analysis of recreation and open space was not a quantified analysis because San Francisco has no applicable ratio of parks and open space per number of people. Rather, the General Plan Recreation and Open Space Element (ROSE)

[138] Metropolitan Transportation Commission, Plan Bay Area 2020 Draft EIR, April 2017; Table 2.1-7, p. 2.1-11. Available at http://2040.planbayarea.org/sites/default/files/2017-07/PBA%202040%20DEIR_0_1.pdf, accessed November 15, 2017.

calls for a focus on acquisition of open space in underserved areas of the city (Policy 2.1), provision of a balanced recreational system (Policy 2.2), and recreational programs responsive to community needs and changing demographics (Policy 2.3), along with other priorities less applicable to the Plan Area, such as shoreline and civic-serving open spaces. The ROSE also recommends expanded provision of privately owned public open spaces (POPOS), particularly in denser neighborhoods such as the Plan Area. The Initial Study considered that the Plan proposes new publicly available open spaces as well as a comprehensive pedestrian-friendly network to increase access to existing, new, and improved spaces. In particular, the Plan would result in a new park on the block bounded by Bryant, Fourth, Brannan, and Fifth streets, a linear park on Bluxome Street, and numerous other open space improvements, along with, potentially, the creation of a large new park within or near Central SoMa. It is also noted that the Plan Area, like the entirety of San Francisco, has easy access to recreational facilities: San Francisco is the only city in the United States where all residents have access to a park within a 10-minute walk.[139] Therefore, and in recognition of the Plan's proposals for increased open space, the Initial Study's conclusion that the Plan would not increase the use of existing neighborhood and recreational facilities such that substantial physical deterioration of such facilities would occur or be accelerated remains valid, even considering the greater growth forecasts presented in the Draft EIR.

Utilities and Service Systems

With respect to demand for Utilities and Service Systems, the Initial Study finds that the Plan would result in less-than-significant effects related to potable water demand. This conclusion remains valid considering the greater growth forecasts presented in the Draft EIR because the Initial Study estimated water demand of 2.8 million gallons per day using an older, more conservative (i.e., higher) calculation approach. In contrast the Draft EIR relied upon the San Francisco Public Utilities Commission's (SFPUC's) water use calculator, the accepted standard methodology as of December 2016. Based on the SFPUC calculator, the Draft EIR estimates water demand of 1.7 million gallons per day using the higher growth forecasts presented in the Draft EIR (p. IV.I-32). The Initial Study also found a less-than-significant effect with respect to solid waste generation. This conclusion remains valid in light of the greater growth forecasts presented in the Draft EIR because the generation figure of 20,000 tons per day (tpd) provided in the Initial Study (p. 116) was rounded up from a conservative calculation of 19,100 tpd.[140] The relatively small increase in growth projections would result in an increase of about 700 tpd, which would still be less than the 20,000 tpd analyzed in the Initial Study. (The Draft EIR analyzed wastewater and stormwater generation in the context of the potential for combined sewer discharges and are based on the Draft EIR growth projections.) It is noted that adequate provision of services is not the relevant standard for a physical impact under CEQA. The Initial Study evaluated utilities and service systems and determined that the Plan would not result in the need for new or expanded facilities, the construction of which could result in significant physical impacts on the environment, which is the question to be answered under CEQA.

Public Services

The greater growth forecasts presented in the Draft EIR could incrementally increase demand for police, fire/emergency medical services (EMS), parks, and school capacity, compared to that discussed in the

[139] Office of the Mayor, "San Francisco Becomes First City in Nation Where All Residents Live within a 10-Minute Walk to a Park," May 16, 2017. Available at: http://sfmayor.org/article/san-francisco-becomes-first-city-nation-where-all-residents-live-within-10-minute-walk-park. Accessed August 13, 2017.

[140] Solid waste generation estimated by ESA on the basis of consolidated generation factors from CalRecycle, the City of San Diego, and the CalEEMod air quality and greenhouse gas model. Generation factors conservatively assume diversion from landfill of approximately 50 percent of discarded materials.

Initial Study. Since publication of the Initial Study, new police and fire/EMS facilities have opened in Mission Bay, about 0.5 mile south of the Plan Area. The new Southern Police Station at Mission Bay serves the Plan Area, while the new Fire Station 4 responds to certain calls within the Plan Area. As explained in more detail in Response PS-2 in Section D.16, Initial Study Topics, the question to be answered under CEQA with respect to public services is whether a project would necessitate the construction of new facilities that could cause significant environmental impacts. The Initial Study determined that such a condition would not arise. However, should the Fire or Police departments (or another City agency) determine at some point that new facilities are needed, any potential effects from construction of such facilities would be similar to those already analyzed in the Draft EIR and the Initial Study in connection with growth anticipated under the Plan. Such impacts could include, for instance, construction noise, effects on historical and archeological resources, air quality impacts such as emissions of dust and other pollutants, and temporary street closures or other traffic obstructions. That is, construction of a new fire station, police station, or other comparable government facility would not result in new significant impacts not already analyzed; thus, the effects would already have been addressed in the Draft EIR and the Initial Study. Accordingly, the slightly greater growth forecasts presented in the Draft EIR, compared to those in the Initial Study, would not change the conclusion of the Initial Study, that the Plan "would not increase the demand for police service or fire protection service such that new or physically altered facilities, **the construction of which could cause significant environmental impacts**, would be required in order to maintain acceptable levels of service" [emphasis added].

Concerning school facilities, based on recent growth in public school enrollment and forecasts for continued growth, the San Francisco Unified School District is moving forward with plans for a new school in the Mission Bay South Redevelopment Area. (Development of this school was assumed in the Mission Bay Supplemental EIR of 1998.) Funding for this school could come, in part, from Proposition A school bonds passed by San Francisco voters in November 2016. As with utilities and service systems, the relevant inquiry with respect to public services is whether adverse physical impacts would result from construction of new facilities. To the extent construction of this or any other new school that the San Francisco Unified School District determines is needed to accommodate growing enrollment, the environmental effects of such facilities would be similar to that of subsequent development projects, which are disclosed in the Initial Study and Draft EIR. Regarding financial (socio-economic, as opposed to physical) effects, as with all development projects in San Francisco, development in the Plan Area would be assessed a per-gross-square-foot school impact fee, as stated on Initial Study p. 122. As stated on Initial Study p. 123, local jurisdictions are precluded under state law (Senate Bill 50) from imposing school-enrollment–related mitigation beyond the school impact fees. The collection of these fees fully mitigates any potential effects on schools associated with additional development resulting from Plan implementation; therefore, the Initial Study's less-than-significant conclusion remains valid.

* On Draft EIR pp. IV-6, footnote d. in Table IV-1 is revised as follows:

d. The 2016 Central SoMa Plan is contained entirely within the boundaries of the 2013 draft Plan Area. The Department analyzed projected growth in employment and residential uses for the 2013 draft Plan and determined that 95 to 97 percent of the~~is~~ projected growth due to the Plan is anticipated to occur in the 2016 draft Plan Area. Thus, the numbers presented in this table, are conservative (i.e., higher) and would not substantively alter the conclusions reached in this EIR. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study.

On Draft EIR pp. IV-8 to IV-9, the first two paragraphs have been revised as follows to clarify project descriptions listed under "Subsequent Development Projects" and remove a duplicate project:

- **598 Brannan Street:** The proposed development would consist of four new buildings containing approximately ~~984,400~~922,300 square feet of office, ~~61,340~~75,000 square feet of ~~retail~~ ground-floor

commercial area (Retail/PDR), and ~~104,800~~88,000 square feet of residential (approximately ~~100~~90 dwelling units). Existing buildings to be demolished include the four existing one-and two-story commercial, industrial, and warehouse buildings and associated surface parking lots. The proposed project would also include a new approximately ~~33,000~~38,000-square-foot park at the center of the project site.

…

- **636–648 Fourth Street:** The proposed project variant (to a non-Plan-compliant submittal) would include a ~~350~~250-foot-tall primarily residential tower with ~~427~~ approximately 270 units and approximately ~~3,200~~4,500 square feet of ground floor commercial space. Two existing one- and two-story commercial buildings and a general advertising billboard would be demolished.

…

- **400 Second Street:** The proposed project would merge multiple parcels on the south side of Harrison Street, retain one of the existing buildings (645 Harrison Street), demolish the remaining four structures, and construct two new buildings and an addition above the existing 645 Harrison Street structure. The project anticipates construction of two towers reaching heights of approximately 350 feet, and an additional building reaching a height of approximately 200 feet. The proposed project would result in the creation of a midblock passageway connection between Harrison and Perry Streets, improvement of the existing Vassar Place, and a new connection from Second Street to Vassar Place and Perry Street. The proposed project would create approximately 380 dwelling units, 500 hotel rooms, and 535,000 gross square feet of office use, of which 421,000 square feet would be net new office space. ~~The proposed project would demolish the existing one- to four-story buildings and construct three new buildings.~~

…

- **531 Bryant Street:** The proposed project would demolish the two existing buildings on the site, and proposes two possible options: either (l) complete removal of these structures or (2) potential retention of the existing building façade along Bryant Street ~~retain the existing façade and construct a new six-story building~~.

…

- ~~**725–765 Harrison Street:** The proposed project would include construction of a mid-rise building and tower containing residential and production, distribution, and repair uses, as well as publicly-accessible open space~~

* On Draft EIR p. IV-10, the following header and subsequent text regarding the State Density Bonus has been added for clarification on p. IV-10 in the "Overview" section of Draft EIR Chapter IV, Environmental Setting, Impacts, and Mitigation Measures:

State Density Bonus

The California state density bonus law, adopted in 1978, allows developers to select concessions from local development standards if a certain percentage of affordable units are included in a project. In 2017, subsequent to publication of the Draft EIR, the City approved amendments to its local housing density bonus program, codified in Planning Code Section 206, Affordable Housing Bonus Programs. Section 206 incorporates, among other programs, the 100 Percent Affordable Housing Bonus Program (Planning Code Section 206.4; approved in 2016 as Section 206.3), which allows for up to three additional stories of residential development for fully affordable residential projects, as well as

procedures for projects seeking approval of a state density bonus (Planning Code Section 206.6). Both of these programs would be applicable to the Plan Area.[141]

The growth assumptions in the Draft EIR (which includes both the currently proposed Plan Area as well as the area of the 2013 draft Plan) are derived from overall citywide growth assumptions developed by the Planning Department based on the regional planning effort underlying Plan Bay Area. Plan Bay Area growth allocations for the city can be accommodated under existing height and bulk controls; thus existing zoning is not currently a constraint on growth or determinant of the overall amount of housing growth expected citywide by 2040. Given that, it is assumed that increased residential development in the Plan Area due to the use of the state density bonus and/or the Plan's own height bonus would lead to a concomitant decrease in residential development elsewhere in San Francisco. That is, while the Plan seeks to concentrate and focus a greater percentage of San Francisco's growth in the Plan Area, adoption of the Plan in and of itself would not alter the overall growth forecast under Plan Bay Area to occur in San Francisco.[142] Therefore, the Draft EIR adequately analyzes growth that could occur pursuant to both the state density bonus program and the Plan's own height bonus provision, and the resulting effects such as transportation, air quality, traffic noise, and water demand and combined sewer flows. Regarding other effects, such as aesthetics and wind or shadow impacts, which are site-specific, it would be speculative to analyze potential future height and/or density on any given site when it cannot be known on which specific sites any such density or height bonus might be sought in the future. Subsequent development projects in the Plan Area would undergo project-level CEQA review, as applicable, to determine whether or not they would result in significant environmental effects not disclosed in the Draft EIR as a result of any additional height increases or bulk modifications permitted under the state density bonus law.

* On Draft EIR p. IV-10, following Subsequent Development Projects, the following header and text has been added to clarify the potential designation of the Central SoMa Plan Area as a Housing Sustainability District.

Housing Sustainability District and Eligible Projects

As noted in Chapter I, Introduction, the City, through adoption of an ordinance by the Board of Supervisors, could choose to designate portions of the Central SoMa Plan Area as a HSD. Should the Central SoMa Plan Area be designated as a HSD and that designation not result in any changes to height, bulk, density, use, or other development standards proposed in the Plan Area, implementation of the HSD would not change or intensify the anticipated physical or programmatic parameters of development allowed under the proposed Central SoMa Plan. Therefore, designation of the Central SoMa Plan Area as a HSD would not change any of the conclusions reached in this EIR. Furthermore, eligible projects seeking entitlement under the HSD would be required to meet adopted design review standards, comply with the Plan as analyzed in the EIR, and incorporate applicable mitigation measures from this EIR. Pursuant to AB 73, subsequent projects in the Plan Area that meet the requirements of a HSD would not require further environmental review.

[141] Two other components of Section 206—the Housing Opportunities Mean Equity – San Francisco, or HOME-SF Program (Section 206.3) and the analyzed state density bonus program (Section 206.5)—would not apply to the Plan Area, as they are applicable only to use districts where residential density is regulated by lot size. In the Plan Area, residential density would be regulated by building height and bulk controls, an approach generally known as "form-based zoning."

[142] When allocating anticipated future regional growth that is assigned through the regional planning process to San Francisco, the Planning Department, as part of a forecasting exercise for a plan area such as Central SoMa, maintains cumulative totals consistent with the regional plan, inclusive of whatever proposed zoning changes are being analyzed.

E.6 Section IV.A, Land Use and Land Use Planning

On Draft EIR p. IV.A-1, the second sentence of the second paragraph has been revised as follows to correct an editorial error:

> … Its boundaries extend from Second Street on the east to Sixth Street on the west, from Townsend Street on the south, and along an irregular northern border that generally jogs along Folsom, Howard, and Stevenson Streets to its northernmost point at Stevenson and ~~Mission~~ Sixth Streets. …

On Draft EIR p. IV.A-12, the second bullet has been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

> - *Planning Code* provisions concerning off-street parking and loading and~~, assuming they are enacted by the Board of Supervisors in 2016, concerning~~ transportation demand management, as discussed in Section IV.D, Transportation and Circulation.

E.7 Section IV.B, Aesthetics

On Draft EIR p. IV.B-12, the first sentence of the fifth paragraph has been revised as follows to clarify the distance noted:

> The visual character of the area just two blocks north of the Plan Area (within 1,200 feet) is dominated by large, relatively shorter structures on large lots. …

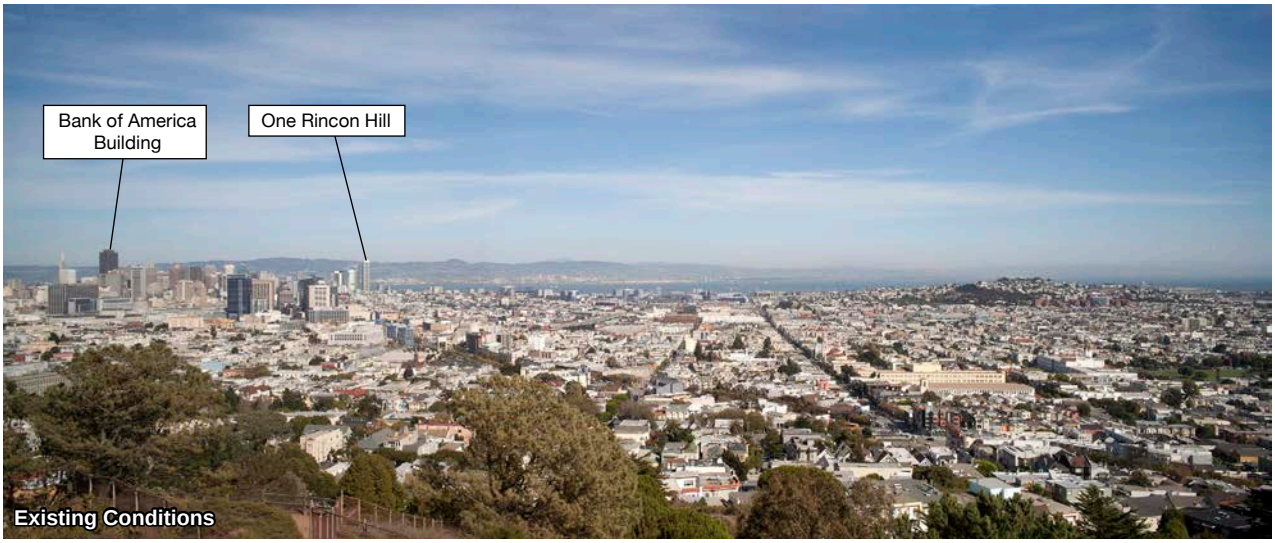
* On Draft EIR p. IV.B-22, Figure IV.B-15, Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan, is revised to correctly portray a 240-foot-tall tower at the southeast corner of Fourth and Harrison streets.

* On Draft EIR p. IV.B-23, Figure IV.B-16, Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan and Cumulative, is revised to correctly portray a 240-foot-tall tower at the southeast corner of Fourth and Harrison streets.

* On Draft EIR p. IV.B-26, Figure IV.B-19, Mid-Range Visual Simulation: Interstate 80 Westbound: Existing Conditions Plus Plan, is revised to correctly portray a 240-foot-tall tower at the southeast corner of Fourth and Harrison streets.

On p. IV.B-33, the sixth sentence of the first paragraph beneath the heading "Development under the Plan" has been revised as follows to clarify the proposed height limits north of Bryant Street:

> … The Plan, as analyzed in this EIR, would also allow for towers between 200 and 350 feet in height on the north and south sides of Harrison Street between Second and Third Streets (interspersed on the north side with a height limit of 130 feet and on the south side with height limits of 130 feet and 160 feet), a tower of 240 feet at the southeast corner of Fourth and Harrison Streets, a tower of 200 feet in height on the northeast corner of Third and Harrison Streets, a 180-foot tower at the northwest corner of Fourth and Folsom Streets, and a 300-foot-tall tower on the southwest corner of Fifth and Howard Streets. …





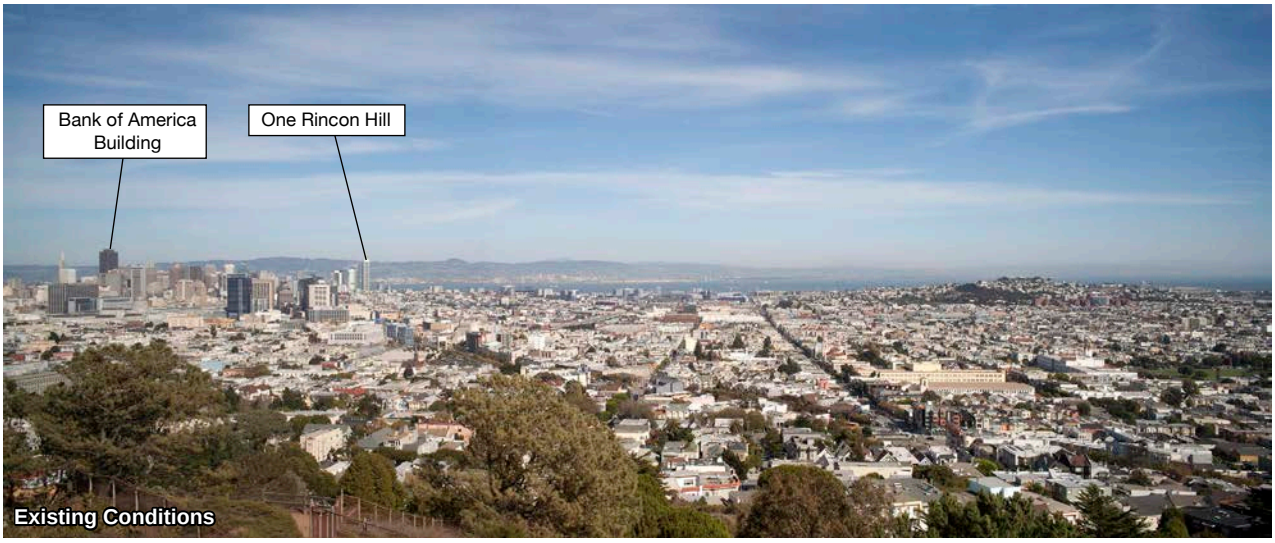
Plan Building

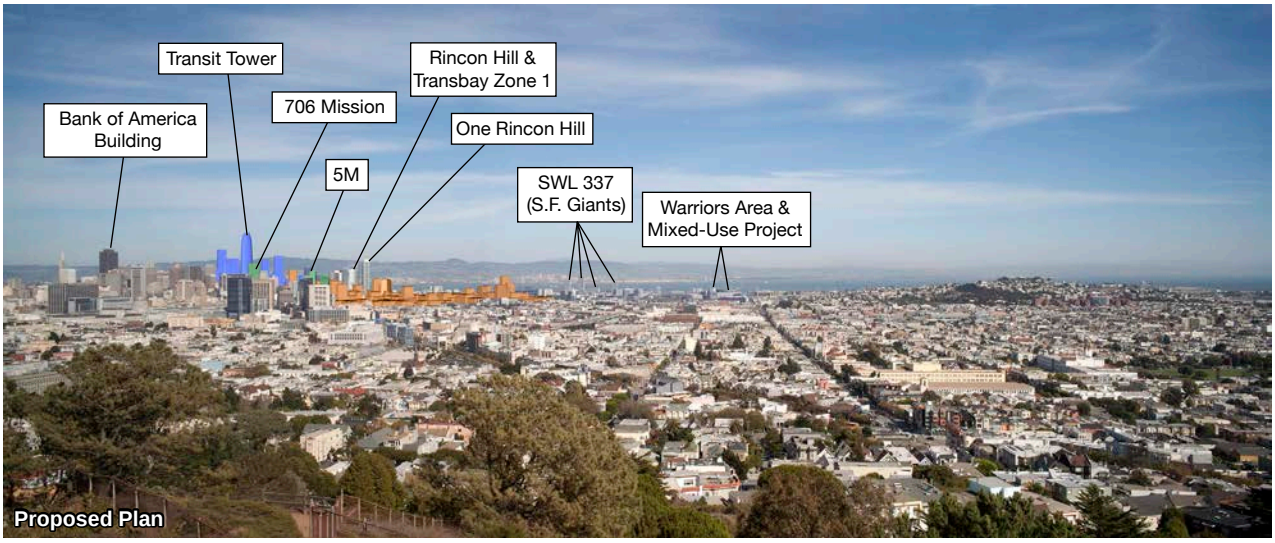
SOURCE: Square One, 2016

Case No. 2011.1356E: Central SoMa Plan

Figure IV.B-15

Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan [Revised]





Plan Building | Transit Center District Plan | Rincon Hill/Transbay Zone 1 | Other Cumulative Development

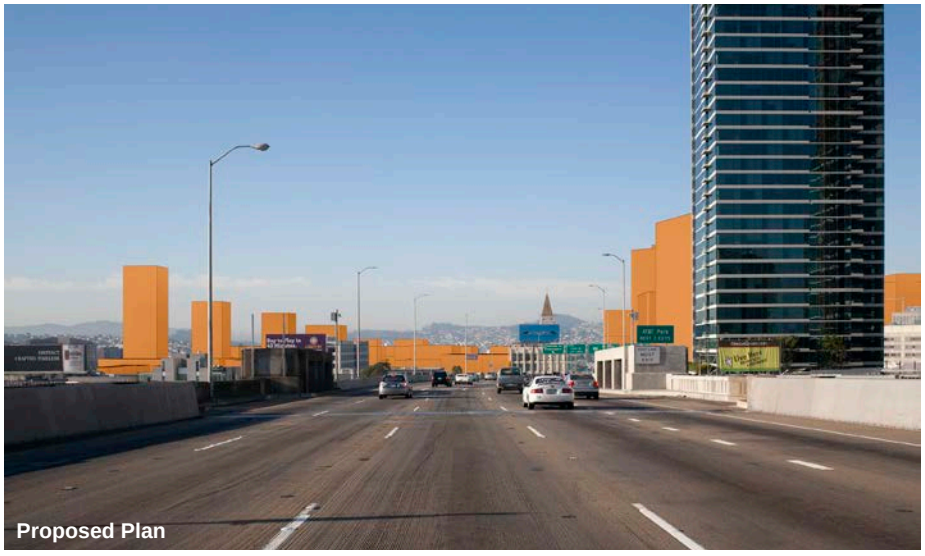
SOURCE: Square One, 2016

Case No. 2011.1356E: Central SoMa Plan

Figure IV.B-16

Long-Range Visual Simulation: Corona Heights Park: Existing Conditions Plus Plan and Cumulative [Revised]





Plan Building

Case No. 2011.1356E: Central SoMa Plan

SOURCE: Square One, 2014

Figure IV.B-19
Mid-Range Visual Simulation: Interstate 80 Westbound:
Existing Conditions Plus Plan [Revised]

On Draft EIR p. IV.B-38, the last sentence in the first partial paragraph has been revised as follows to clarify the location of the tallest potential buildings in the Plan Area:

> … The tallest new vertical elements (at parcels on Fourth Street at Townsend Street, Fourth Street at Brannan Street, and Harrison Street between Second and Fourth Streets ~~at Third Street~~) would partially obscure views of the Bay from Corona Heights Park, but not to a large extent.

E.8 Section IV.C, Cultural and Paleontological Resources

On Draft EIR p. IV.C-12, the fifth sentence of the second full paragraph has been revised as follows to clarify the distance noted:

> … A new Bessie Carmichael School/FEC was built for grades K-5 at 375 Seventh Street (a block [about 800 feet] west of the Plan Area) in 2004, with the Harrison Street campus now serving as the campus' middle school; together, the two facilities comprise the only public school in the South of Market. …

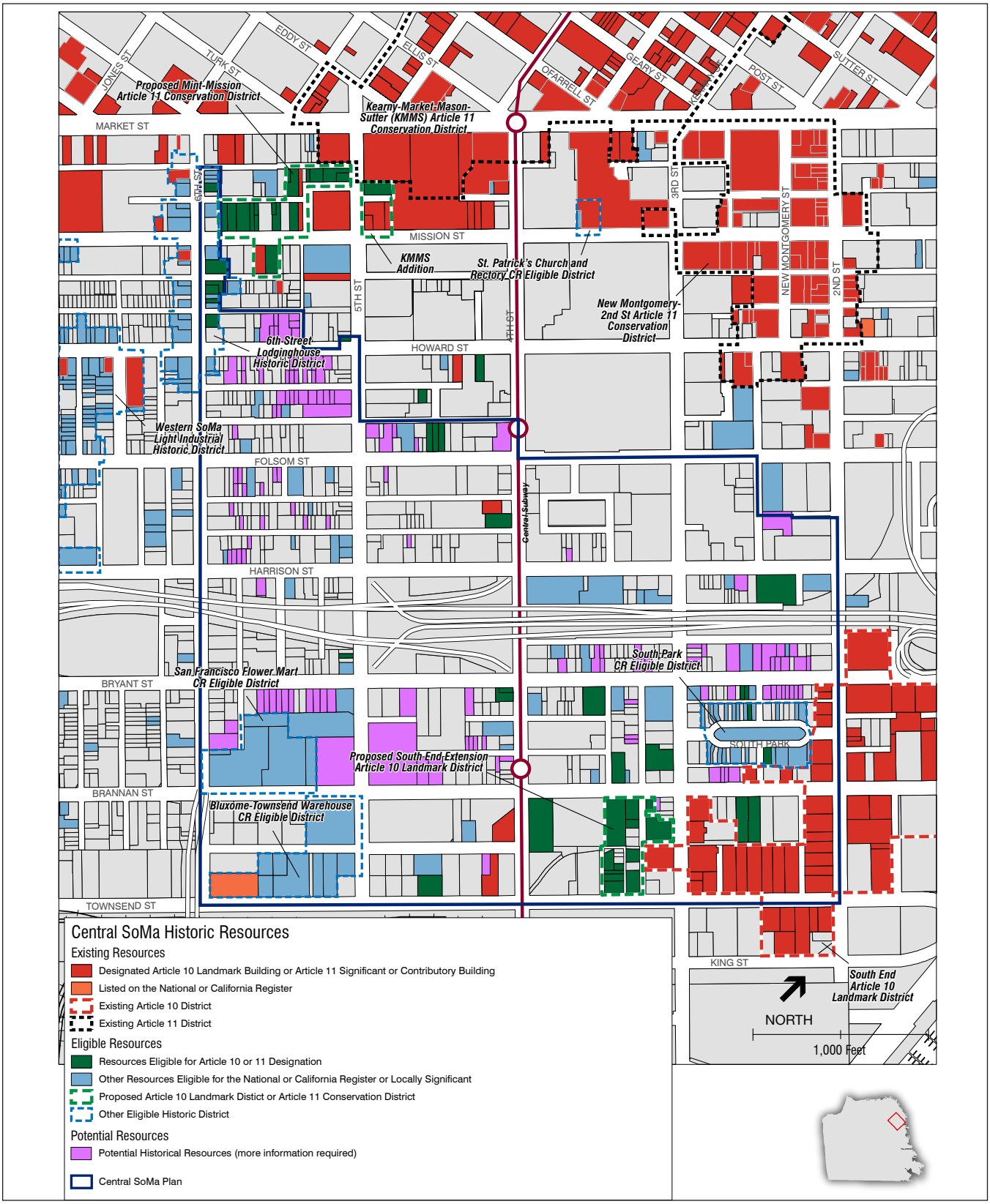
On Draft EIR p. IV.C-12, the seventh sentence of the second full paragraph has been revised as follows to clarify the distance noted:

> … Since that time, the apartments have largely been occupied by newly arrived Filipino families, while the ground floor commercial space has provided a home for numerous Filipino community organizations, such as the West Bay Pilipino Multi-Service Center (now on Seventh Street, a block [about 800 feet] west of the Plan Area), the South of Market Employment Center, Bayanihan Community Center (now located in the Bayanihan House at 1010 Mission Street, just west of the Plan Area), and Bindlestiff Studio theater (now on Sixth Street). …

* On Draft EIR p. IV.C-16, Figure IV.C-2, Historical Resources in the Plan Area and Vicinity, is revised to show all known and potential historical resources in the Central SoMa Plan Area.

* On Draft EIR, p. IV.C-25, the last paragraph has been modified to incorporate more recent information concerning the California Register-eligible Flower Mart Historic District.

> The Central SoMa Survey identified a California Register-eligible historic district consisting of five interconnected structures that comprise the San Francisco Flower Mart, located on the southern half of the block bounded by Bryant, Fifth, Brannan, and Sixth Streets. Four of the five buildings were completed in 1956 and at least three of those were designed by master architect Mario Ciampi; a fifth building was added in 1967. The Flower Mart appears eligible for the California Register under Criteria 1 and 3 for its associations with San Francisco's floral industry and inter-ethnic commercial cooperation, as well as its purpose-built design by Mario Ciampi. The Historic Preservation Commission concurred in the eligibility of this district as part of its approval of the Central SoMa Survey. Subsequent research in connection with a proposed development project at this location has identified eight separate buildings, some of which are interconnected, as comprising the Flower Mart Historic District; the five largest buildings were attributed to Ciampi.[22a] One of the buildings was newly determined eligible since publication of the Draft EIR, while the others were reclassified from five structures to seven. This district is shown in Figure IV.C-2.
>
> **Footnote:**
> [22a] Carey & Co., San Francisco Flower Mart: Historic Resource Evaluation Part 1, October 31, 2017, and San Francisco Flower Mart: Historic Resource Evaluation Part 1, October 31, 2017.



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure IV.C-2

Historical Resources in the Plan Area and Vicinity [Revised]

On Draft EIR p. IV.C-55, the first full sentence has been revised as follows to identify additional historic resources that may be affected by anticipated Plan Area development:

> … Listed, designated, and eligible individual historic architectural resources that could be affected by an allowable increase in permitted building height from 85 feet or less to 130 to 160 feet include the following properties: 36 Bluxome Street, 53 Bluxome Street, 350 Townsend Street, 525 Fourth Street, 401 Fourth Street, 428 Third Street, 665 Harrison Street, 177 Stillman Street, 120 Perry Street, 735 Harrison Street, 868 Folsom Street, 854 Folsom Street, 848 Folsom Street, 844 Folsom Street, and 539 Bryant Street. Listed, designated, and eligible individual historic architectural resources that could be affected by an allowable increase in permitted building height from 85 feet or less to over 160 feet include the following properties: 530 ~~5th~~ Fifth Street, 400 ~~2nd~~ Second Street, 401 Fourth Street (765 Harrison Street), 601 Brannan Street, 650 Fifth Street, 665 Harrison Street, 690 Fifth Street, 645 Harrison Street, 620 Fourth Street, 310 Townsend Street, 410 Townsend Street, 424 Townsend Street, and 645 Harrison Street, as well as all of the buildings associated with the California Register-eligible San Francisco Flower Mart District (see Figure IV.C-2, Historical Resources in the Plan Area and Vicinity, and Table APX-C-1 in Appendix C). …

* On Draft EIR p. IV.C-55, the following text has been added, following the first partial paragraph, to clarify that effects on potential historical resources are considered as part of the impact analysis.

> Certain buildings within the Central SoMa Plan Area have been identified as needing more information to determine if they are historic resources (refer to Appendix C). If during subsequent project review, these buildings are identified as historic resources, the demolition or substantial alteration of these buildings would be considered a significant and unavoidable impact.

* On Draft EIR, p. IV.C-56, the second full paragraph has been modified to clarify effects on the California Register-eligible Flower Mart Historic District.

> As described in above, the California Register-eligible San Francisco Flower Mart Historic District consists of ~~five~~ eight partially interconnected structures on the block bounded by Bryant, Fifth, Brannan, and Sixth Streets. It is significant for the California Register under Criteria 1 and 3 for its associations with San Francisco's floral industry and inter-ethnic commercial cooperation, as well as its purpose-built design by master architect Mario Ciampi. Under the Plan, the height limits on this site would be increased from 40 feet to 270 feet, which would potentially allow for approval of a currently proposed project at the site that would demolish the existing Flower Mart buildings (one district contributor that is not on the project site would remain) and reconstruct the Flower Mart as part of a mixed-use project that would contain about 2 million square feet of office space, about 89,000 square feet of retail/restaurant space, a new 125,000 square foot Flower Mart, along with publicly accessible open space. The project would include three towers, ranging up to 270 feet in height, as well as mid-rise buildings. This subsequent development project, were it to be approved, would result in the loss of all but one of the contributors to this California Register-eligible San Francisco Flower Mart Historic District, which would effectively eliminate the potential district and would be a significant and unavoidable impact.

* On Draft EIR, p. IV.C-56, the following text in the last partial paragraph has been modified to clarify that effects to as-yet-to-be-identified resources are included as part of the impact evaluation.

> **Impact Evaluation for Individual Historic Architectural Resources, and Historic Districts/Conservation Districts, and As-yet Unidentified Resources**
>
> When an Environmental Evaluation Application is filed with the Environmental Planning Division of the Planning Department ~~for a project~~ that would result in the demolition or alteration of an as-yet-to-be-identified resource, an individual historic architectural resource, or a contributor to a historic district or conservation district, or would result in new construction within or immediately adjacent to such a district, Preservation staff will conduct an initial evaluation of the building and of the proposed project.
> …

* On Draft EIR p. IV.C-58, Mitigation Measure M-CP-1a has been revised as follows to clarify guidance with regard to avoiding or minimizing effects on historical impacts:

> **Mitigation Measure M-CP-1a: Avoidance or Minimization of Effects on ~~Identified~~ Historical Resources.** The project sponsor of a subsequent development project in the Plan Area shall consult with the Planning Department~~'s Preservation staff~~ at the time of submittal of an environmental evaluation application to determine whether there are feasible means to ~~redesign or otherwise revise the project to~~ avoid a substantial ~~significant~~ adverse change in the significance of an ~~effects on~~ historic architectural resource~~(s)~~ (including historic districts), whether previously identified or identified as part of the project's historical resources analysis. Pursuant to CEQA Guidelines Section 15064.5(b), "[s]ubstantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." If avoidance is not feasible, the project sponsor shall ~~seek feasible means to~~ reduce effects on historic architectural resource(s) to the maximum extent feasible. ~~a less than significant level,~~ Avoidance and minimization measures shall seek to retain the resource's character-defining features, and may include, but are not limited to: retention of character-defining features, building setbacks, salvage, or adaptive reuse. ~~with the significance of the impact to be judged based on whether the proposed project would materially impair the resource as defined in CEQA Guidelines Section 15064.5(b).~~
>
> Should Mitigation Measure M-CP-1a be determined to be infeasible, Measures M-CP-1b, M-CP-1c, M-CP-1d, and/or M-CP-1e, shall be applicable, based on the specific circumstances of the project in question. CEQA Guidelines Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The applicability of each factor would vary from project to project, and would be determined by staff on a case-by-case basis.

* On Draft EIR p. IV.C-59, Mitigation Measure M-CP-1c has been revised as follows to clarify when the mitigation would need to be implemented:

> **Mitigation Measure M-CP-1c: Oral Histories.** For projects that would demolish a historical resource or contributor to a historic district for which Planning Department preservation staff determined that such a measure would be effective and feasible, the project sponsor shall undertake an oral history project prior to demolition or adverse alteration of the resource that includes interviews of people such as residents, past owners, or former employees. The project shall be conducted by a professional historian in conformance with the Oral History Association's Principles and Standards (http://alpha.dickinson/edu/oha/pub_eg.html). In addition to transcripts of the interviews, the oral

history project shall include a narrative project summary report containing an introduction to the project, a methodology description, and brief summaries of each conducted interview. Copies of the completed oral history project shall be submitted to the San Francisco Public Library, Planning Department, or other interested historical institutions.

On Draft EIR p. IV.C-59, Mitigation Measure M-CP-1e has been revised as follows to clarify video documentation requirements:

> **Mitigation Measure M-CP-1e: Video Recordation.** For projects that would demolish a historical resource or contributor to a historic district for which Department Preservation ~~Planning~~ staff determined that such a measure would be effective and feasible, the project sponsor shall work with Department Preservation staff or other qualified professional, to undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated 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 Code of Federal Regulations, Part 61). The documentation shall ~~include as much information as possible using~~ use visuals in combination with narration about the materials, construction methods, current condition, historic use, and historic context of the historical resource.
>
> Archival copies of the video documentation shall be submitted to the Planning Department, and to repositories including but not limited to~~:~~ the San Francisco Public Library, Northwest Information Center, and ~~the~~ California Historical Society. This mitigation measure would supplement the traditional HABS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research.

* On Draft EIR p. IV.C-62, Mitigation Measure M-CP-3a has been revised as follows to clarify the proposed boundary for protecting historical resources from adjacent construction activities:

> **M-CP-3a: Protect Historical Resources from Adjacent Construction Activities.** The project sponsor of a development project in the Plan Area shall consult with Planning Department Environmental Planning/Preservation staff to determine whether ~~adjacent or nearby~~ buildings constitute historical resources that could be adversely affected by construction-generated vibration. For purposes of this measure, nearby historic buildings shall include those within 100 feet of a construction site for a subsequent development project if pile driving would be used at that site; otherwise, it shall include historic buildings within 25 feet if vibratory and vibration-generating construction equipment, such as jackhammers, drill rigs, bulldozers, and vibratory rollers would be used. If one or more historical resources is identified that could be adversely affected, the project sponsor shall incorporate into construction specifications for the proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings. Such methods may include maintaining a safe distance between the construction site and the historic buildings (as identified by the Planning Department Preservation staff), using construction techniques that reduce vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation), appropriate excavation shoring methods to prevent movement of adjacent structures, and providing adequate security to minimize risks of vandalism and fire. No measures need be applied if no vibratory equipment would be employed or if there are no historic buildings within 100 feet of the project site.

On Draft EIR p. IV.C-62, Mitigation Measure M-CP-3b has been revised as follows to clarify that implementation of the mitigation measure may be subject to access being granted by the owner(s) of adjacent properties:

> **M-CP-3b: Construction Monitoring Program for Historical Resources.** For those historical resources identified in Mitigation Measure M-CP-3a, and where heavy equipment would be used on a subsequent development project, the project sponsor of such a project shall undertake a monitoring program to minimize damage to ~~adjacent~~ historic buildings and to ensure that any such damage is documented and repaired. The monitoring program, which shall apply within 100 feet where pile driving would be used and within 25 feet otherwise, shall include the following components, subject to access being granted by the owner(s) of adjacent properties, where applicable. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a pre-construction survey of historical resource(s) identified by the San Francisco Planning Department within 125 feet of planned construction to document and photograph the buildings' existing conditions. Based on the construction and condition of the resource(s), the consultant shall also establish a standard maximum vibration level that shall not be exceeded at each building, based on existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 inch per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard, the project sponsor shall monitor vibration levels at each structure and shall prohibit vibratory construction activities that generate vibration levels in excess of the standard. Should owner permission not be granted, the project sponsor shall employ alternative methods of vibration monitoring in areas under the control of the project sponsor.
>
> Should vibration levels be observed in excess of the standard, construction shall be halted and alternative construction techniques put in practice, to the extent feasible. (For example, pre-drilled piles could be substituted for driven piles, if feasible based on soils conditions; smaller, lighter equipment might be able to be used in some cases.) The consultant shall conduct regular periodic inspections of each building during ground-disturbing activity on the project site. Should damage to either building occur, the building(s) shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity on the site.

* On Draft EIR p. IV.C-66, the first paragraph of Mitigation Measure M-CP-5 has been edited for clarity:

> **Mitigation Measure M-CP-5: Project-Specific Tribal Cultural Resource Assessment.** This tribal cultural resource mitigation measure shall apply to any project involving any soils-disturbing or soils-improving activities including excavation, utilities installation, grading, soils remediation, compaction/chemical grouting to a depth of ~~five (~~5~~)~~ feet or greater below ground surface.
>
> Projects to which this mitigation measure applies shall be reviewed for the potential to affect a tribal cultural resource in tandem with the ~~P~~preliminary ~~A~~archeology ~~R~~review ~~(PAR)~~ of the project by the San Francisco Planning Department archeologist. For projects requiring a ~~M~~mitigated ~~N~~negative ~~D~~declaration or ~~E~~environmental ~~I~~impact ~~R~~report, the Planning Department "Notification Regarding Tribal Cultural Resources and CEQA" shall be distributed to the ~~D~~department's tribal distribution list. Consultation with California Native American tribes regarding the potential of the project to affect a tribal cultural resource will occur at the request of any notified tribe. For all projects subject to this mitigation measure, if staff determines that the proposed project may have a potential significant adverse effect on a tribal cultural resource, then the following shall be required as determined warranted by the ERO.

If staff determines that preservation-in-place of the tribal cultural resource is both feasible and effective, based on information provided by the applicant regarding feasibility and other available information, then the project archeological consultant shall prepare an archeological resource preservation plan ~~(ARPP)~~. Implementation of the approved ~~ARPP~~ plan by the archeological consultant shall be required when feasible. If staff determines that preservation–in-place of the Tribal Cultural Resource is not a sufficient or feasible option, then the project sponsor shall implement an interpretive program of the ~~TCR~~ resource in coordination with affiliated Native American tribal representatives. An interpretive plan produced in coordination with affiliated Native American tribal representatives, at a minimum, and approved by the ERO shall be required to guide the interpretive program. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

E.9 Section IV.D, Transportation and Circulation

On Draft EIR p. IV.D-12, Figure IV.D-4, Missing Curb Ramps, Closed Crosswalks, and Multiple Turning Lanes, has been updated to show removed, closed, and/or installed crosswalks and symbols at various intersections.

On Draft EIR p. IV.D-23, the last bullet has been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

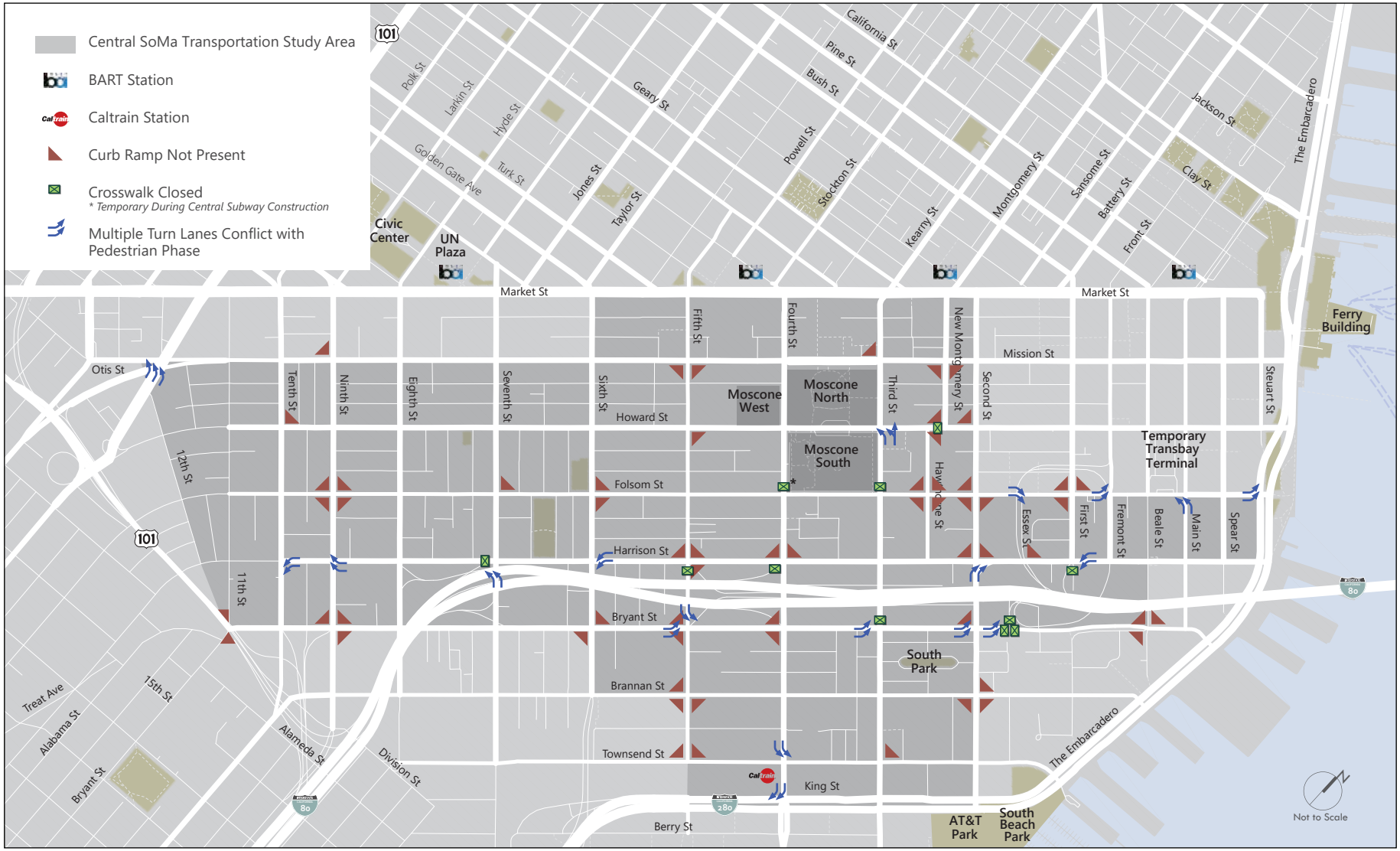
- Encourage Sustainable Travel. This component of the Transportation Sustainability Program would help manage demand on the transportation network through a Transportation Demand Management (TDM) Program, making sure new developments are designed to make it easier for new residents, tenants, employees, and visitors to get around by sustainable travel modes such as transit, walking, and biking. Each measure that would be included in the TDM program is intended to reduce VMT traveled from new development. Resolution No. 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016~~, and the *Planning Code* amendments have been forwarded to~~. On February 7, 2017, the Board of Supervisors approved Ordinance No. 34-17, which the Mayor signed on February 17, 2017, adopting the TDM Program. The TDM Program became effective on March 19, 2017~~ for legislative approval~~.

* On Draft EIR p. IV.D-25, the last bullet has been revised as follows to clarify that *Plan Bay Area* did not develop an employee VMT goal:

- Taken as a whole, development specified in the plan leads to a VMT that is equal to or less than the VMT per capita ~~and VMT per employee~~ specified in the SCS.

On Draft EIR p. IV.D-40, the last two sentences have been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

… As noted above, on February 7, 2017, ~~the Planning Department is currently pursuing an ordinance amending the *Planning Code* to establish a citywide TDM Program. Resolution 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016. If the proposed Planning Code amendments are legislated by~~ the Board of Supervisors approved Ordinance No. 34-17, adopting a citywide TDM Program. Therefore, development projects within the Plan Area would be subject to the requirements of the TDM Program.



SOURCE: Fehr & Peers

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Figure IV.D-4

Missing Curb Ramps, Closed Crosswalks, and Multiple Turning Lanes [Revised]

On Draft EIR p. IV.D-45, the sources of Table IV.D-8 are revised as follows:

SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); ~~,~~ Fehr & Peers, 2016.

On Draft EIR p. IV.D-46, the sources of Table IV.D-9 are revised as follows:

SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); ~~,~~ Fehr & Peers, 2016.

On Draft EIR p. IV.D-48, the sources of Table IV.D-10 are revised as follows:

SOURCES: SF Planning Department Memoranda, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2012 regional transit ridership data), and *Updated BART Regional Screenlines*, October 2016~~,~~; Fehr & Peers, 2016.

* On Draft EIR p. IV.D-52, the last sentence of the second paragraph has been removed as implementing Tow-away Transit-only Lanes on Fifth Street was determined not to be feasible as this measures conflicts with an approved project on Fifth Street which was included in the 2009 Bike Plan.

~~In addition, implementation of Mitigation Measure M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street (described below), would provide a transit-only lane on Fifth Street and would mitigate transit delay impacts on the 47-Van Ness route. However, because it is not known whether or how much additional funding would be generated for transit improvements as part of these mitigation measures, and whether SFMTA could provide additional service, boarding improvements, or a transit-only lane on Fifth Street to fully mitigate project impacts, transit impacts with implementation of the street network changes would still be considered *significant and unavoidable with mitigation*.~~

On Draft EIR, p. IV.D-53, Mitigation Measure M-TR-3a has been revised as follows to clarify the responsible City and County entities, clarify potential actions to enhance transit funding, and remove the last two sentences of the paragraph entitled, "Muni Storage and Maintenance," because this text does not refer to a specific action by SFMTA:

M-TR-3a: Transit Enhancements. The following are City and County actions that could reduce the transit impacts associated with implementation of the Central SoMa Plan.

Enhanced Transit Funding. To accommodate project transit demand, the SFMTA, and other City agencies and departments as appropriate, shall ~~ensure that~~ seek sufficient operating and capital funding ~~is secured~~, including through the following measures:

- Establish fee-based sources of revenue ~~such as parking benefit districts~~.
- Establish a congestion-charge scheme for downtown San Francisco, with all or a portion of the revenue collected going to support improved local and regional transit service on routes that serve Downtown and the Central SoMa Plan Area.
- ~~Seek grant funding for specific capital improvements from regional, state and federal sources.~~Area Plan funding for transit enhancements.

Transit Corridor Improvement Review. During the design phase, the SFMTA shall review each street network project that contains portions of Muni transit routes where significant transit delay impacts have been identified (routes 8 Bayshore, 8AX Bayshore Express, 8BX Bayshore Express, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness). Through

this review, SFMTA shall incorporate feasible street network design modifications that would meet the performance criteria of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Such features could include, but shall not be limited to, transit-only lanes, transit signal priority, queue jumps, stop consolidation, limited or express service, corner or sidewalk bulbs, and transit boarding islands, as determined by the SFMTA, to enhance transit service times and offset transit delay. Any subsequent changes to the street network designs shall be subject to a similar review process.

Transit Accessibility. To enhance transit accessibility, the Planning Department and the SFMTA shall establish a coordinated planning process to link land use planning and development in Central SoMa to transit and other ~~transportation~~ sustainable mode planning. This shall be achieved through some or all of the following measures:

- Implement recommendations of the *Better Streets Plan* that are designed to make the pedestrian environment safer and more comfortable for walk trips throughout the day, especially in areas where sidewalks and other realms of the pedestrian environment are notably unattractive and intimidating for pedestrians and discourage walking as a primary means of circulation. This includes traffic calming strategies in areas with fast-moving, one-way traffic, long blocks, narrow sidewalks and tow-away lanes, as may be found in much of the Central SoMa area.
- Implement building design features that promote primary access to buildings from transit stops and pedestrian areas, and discourage the location of primary access points to buildings through parking lots and other auto-oriented entryways.
- Develop Central SoMa transportation implementation programs that manage and direct resources brought in through pricing programs and development-based fee assessments, as outlined above, to further the multimodal implementation and maintenance of these transportation improvements.

Muni Storage and Maintenance. To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall provide maintenance and storage facilities. ~~In 2013, the SFMTA prepared a Real Estate and Facilities Vision for the 21st Century report.[214] The document provides a vision for addressing Muni's storage and maintenance needs, particularly in light of substantial growth in fleet as well as changes in the fleet composition.~~

On Draft EIR p. IV.D-54, Mitigation Measure M-TR-3b has been revised to include other examples of boarding improvements as all of MUNI's fleet will be low-floor buses by 2019 and MuniMobile payment, a form of pre-payment, is currently being considered by SFMTA, and eliminate erroneous cross-references:

M-TR-3b: Boarding Improvements. The SFMTA shall implement boarding improvements such as ~~low floor buses and pre-payment~~ the construction of additional bus bulbs or boarding islands where appropriate, that would reduce the boarding times to mitigate the impacts on transit travel times on routes where Plan ridership increases are greatest, such as the 8 Bayshore, 8AX/8BX Bayshore Expresses, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness routes. These boarding improvements, which would reduce delay associated with passengers boarding and alighting, shall be made in combination with **Mitigation Measures ~~M-TR-3c, Upgrade Transit-only Lanes on Third Street,~~ M-TR-3c~~d~~, Signalization and Intersection Restriping at**

[214] ~~SFMTA, Real Estate and Facilities Vision for the 21st Century, January 2013, http://archives.sfmta.com/cms/cmta/documents/1-29-13VisionReport.pdf, accessed December 31, 2015.~~

Townsend/Fifth Streets, ~~and M-TR-3e, Implement Tow-away Lanes on Fifth Street,~~ which would serve to reduce delay associated with traffic congestion along the transit route.

* On Draft EIR p. IV.D-54, Mitigation Measure M-TR-3d has been removed as this mitigation measure conflicts with an approved project on Fifth Street included in the 2009 Bike Plan. The Bike Plan EIR provides project-level clearance for bicycle facilities on Fifth Street between Market and Townsend streets. The approved project includes removing a northbound travel lane on Fifth Street between Townsend and Bryant streets. Furthermore, following the release of the Draft EIR, SF Planning received new information that SFMTA anticipates that the 47-Van Ness Avenue Muni line will need to be re-routed due to Central Subway–related changes. As a result, the 47-Van Ness line will no longer travel northbound on these particular blocks, which would render this mitigation irrelevant. For these reasons, Mitigation Measure M-TR-3d has been removed from the Draft EIR:

> ~~**M-TR-3d: Implement Tow-away Transit-only Lanes on Fifth Street.** The SFMTA shall implement a northbound tow-away transit-only lane on Fifth Street between Townsend and Bryant Streets during the PM peak period to mitigate the impacts on transit travel times on the 47 Van Ness. This peak period transit-only lane can be implemented by restricting on-street parking (about 30 parking spaces)~~

* On Draft EIR p. IV.D-55, editorial revisions have been made to the mitigation measures listed in the third sentence of the third paragraph:

> Mitigation Measures M-TR-3a, Transit Enhancements, M-TR-3b, Boarding Improvements, ~~M-TR-3c, Upgrade Transit-only lanes on Third Street,~~ and M-TR-3c~~d~~, Signalization and Intersection Restriping at Townsend/Fifth Streets, ~~and M-TR-3e, Implement Tow-away Transit-only Lanes on Fifth Street,~~ would potentially reduce the travel time impacts or mitigate them to less-than-significant levels.

* On Draft EIR p. IV.D-64, several modifications have been made to Mitigation Measure M-TR-4. The first paragraph of the mitigation measure has been revised as specific site constraints (such as the presence of utility poles, bus stops, or platforms) may render the widening of certain crosswalks in the Central SoMa Plan infeasible; the measure has also been revised to state that crosswalks will be upgraded when there is a street network improvement that upgrades sidewalk widths. The second paragraph has been revised to eliminate the monitoring of crosswalk operations and dimensions of specific crosswalks as crosswalks in the Plan Area will be widened as appropriate and feasible when there is a street network improvement that upgrades sidewalk widths:

> **M-TR-4: Upgrade Central SoMa Area Crosswalks.** ~~Consistent with the proposed provisions of the Plan to establish a minimum width of crosswalks of 15 feet, and up to 40 feet where future pedestrian volumes warrant, a~~As appropriate and feasible, the SFMTA shall widen and restripe the crosswalks to the continental design~~, consistent with the Better Streets Plan~~ when there is a street network improvement that upgrades sidewalk widths.
>
> With either the Howard/Folsom One-Way Option or Howard/Folsom Two-Way Option street network changes, the SFMTA shall ~~monitor crosswalk operations for deteriorated conditions (i.e., crosswalk operating conditions of LOS E or LOS F, or observations of substantial crosswalk overcrowding), and~~, as feasible, widen the following crosswalks:
>
> - At the intersection of Third/Mission widen the east and west crosswalks ~~to 20 feet~~.
> - At the intersection of Fourth/Mission widen the east crosswalk ~~to 40 feet~~, and widen the west crosswalk ~~to 35 feet~~.
> - At the intersection of Fourth/Townsend widen the west crosswalk ~~to 30 feet~~.

On Draft EIR p. IV-D.58, Table IV.D-12 is revised to correct existing pedestrian volumes:

TABLE IV.D-12 PEDESTRIAN CROSSWALK LEVEL OF SERVICE—WEEKDAY MIDDAY PEAK HOUR—EXISTING AND EXISTING PLUS PLAN CONDITIONS [REVISED]

Intersection and Crosswalk Locations	Existing			Existing plus Land Use Plan Only Alternative (see Section VI.F, Alternatives)			Existing plus Plan[c]		
	Pedestrians	sf/ped[a]	LOS[b]	Pedestrians	sf/ped	LOS	Pedestrians	sf/ped	LOS
Third/Mission									
North	971	28	C	1,056	25	C	1,063	42	B
South	1,068	23	D	1,162	21	D	1,169	36	C
East	1,121	30	C	1,219	27	C	**1,227**	**12**	**E**
West	921	42	B	1,002	39	C	1,008	**13**	**E**
Third/Howard									
North	653	49	B	710	29	C	715	>60	A
South	716	>60	A	779	36	C	784	>60	A
East	727	42	B	791	24	D	796	>60	A
West	686	49	B	746	28	C	751	16	D
Fourth/Mission									
North	1,171	25	C	1,274	23	D	1,281	42	B
South	1,391	21	D	1,513	19	D	1,522	35	C
East	1,792	27	C	1,949	24	C	**1,961**	**11**	**E**
West	1,645	29	C	1,789	26	C	**1,800**	**10**	**E**
Fourth/Howard									
North	669	>60	A	728	>60	A	732	>60	A
South	580	32	C	631	29	C	635	>60	A
East	1,070	>60	A	1,164	57	B	1,171	>60	A
West	619	24	C	673	22	D	677	26	C
Fourth/Folsom									
North	33	>60	A	42	>60	A	43	>60	A
South	247	53	B	314	4142	B	318	>60	A
East	390	38	C	496	29	C	502	34	C
West	296	>60	A	376	>60	A	381	>60	A
Fourth/Harrison									
North	167	>60	A	212	>60	A	215	>60	A
South and Ramp[d]	—	—	—	—	—	—	—	-	-
East	586161	>60	A	745	49	B	755	42	B
West	278	>60	A	34	>60	A	35	>60	A
Fourth/Bryant									
North	214	>60	A	27	>60	A	27	>60	A
South	19570	>60	A	248	50	B	251	>60	A
East	538152	41	B	684	32	C	693	25	C
West	243	>60	A	31	>60	A	31	>60	A
Ramp	82	>60	A	10	>60	A	10	>60	A
Fourth/Brannan									
North	22245	>60	A	483	56	B	485	>60	A
South	25968	>60	A	563	41	B	566	53	B
East	473116	>60	A	1,028	34	C	1,034	40	B
West	309112	54	B	672	24	D	676	28	C
Fourth/Townsend									
North	484153	>60	A	1,052	38	C	1,058	38	C
South	29088	>60	A	630	38	C	634	38	C
East	483113	>60	A	1,050	34	C	1,056	34	C
West	488166	22	D	**1,061**	**9**	**E**	**1,067**	**9**	**E**
Fourth/King									
North	300118	>60	A	652	44	B	656	44	B
South	448120	>60	A	974	32	C	980	32	C
East	743162	>60	A	1,615	33	C	1,625	33	C
West	768246	>60	AD	1,669	29	C	1,680	29	C

SOURCE: SF Planning Department, Fehr & Peers, 2016. Research, studies, and analysis for the Central SoMa Plan.

NOTES:

a. Square feet per pedestrian. Inputs into this metric include signal cycle length, pedestrian green time, crosswalk square footage, and pedestrian volumes. Changes to any of these inputs across the scenarios (e.g., change in signal cycle from 60 to 90 seconds) lead to changes in the metric value and the resulting LOS.

b. Crosswalks operating at LOS E or LOS F highlighted in **bold**. Shaded indicates significant project impact.

c. With Plan analysis assumes that crosswalks would be widened to width of adjacent sidewalks and signal control changes would also be implemented. Analysis assumes implementation of Howard/Folsom One-Way Option, although pedestrian conditions under the Howard/Folsom Two-Way Option would be similar.

d. At the intersection of Fourth/Harrison Street, pedestrian crossings across the south leg (i.e., crossing Fourth Street) or the I-80 westbound on-ramp are currently not permitted.

* On Draft EIR p. IV.D-67, Improvement Measure I-TR-5a: Cycle Track Public Education Campaign, has been revised as follows:

> **Improvement Measure I-TR-5a: ~~Cycle Track~~ Protected Bicycle Lane Public Education Campaign.** To further reduce potential conflicts between bicyclists and pedestrians, transit and other vehicles, the SFMTA could develop and implement a ~~cycle track~~ protected bicycle lane public education campaign to develop safety awareness by providing information to the public through outreach channels such as media campaigns, brochures, and websites. This campaign would be in addition to the existing SFMTA bicycle safety outreach, specifically geared to Central SoMa and ~~cycle tracks~~ protected bicycle lanes. Elements of the education campaign could include:
>
> - Clarifying rules of the road for ~~cycle tracks~~ protected bicycle lanes.
> - Improving pedestrian awareness about where to wait and how to cross the ~~cycle track~~ protected bicycle lane (i.e., on the sidewalk or buffer zone, rather than in the ~~cycle track~~ separate lane or adjacent to parked vehicles).
> - ~~Providing bicycle safety education for neighborhood schools (e.g., the Bessie Carmichael School), and neighborhood groups within Central SoMa.~~
> - Ensuring that the San Francisco Police Department officers are initially and repeatedly educated on traffic law as it applies to bicyclists and motorists.
> - Providing safety compliance education for bicyclists coupled with increased enforcement for violations by bicyclists.
>
> The public education campaign could include a ~~website~~ webpage, as well as instruction videos with information for cyclists, motorists, and pedestrians. ~~To the extent possible, the public education campaign could be coordinated with the San Francisco Bicycle Coalition efforts.~~ The public education should be coordinated, to the extent possible, with community organizations including the South of Market Community Action Network (SOMCAN), San Francisco Bicycle Coalition, and neighborhood business groups.

* On Draft EIR p. IV.D-67, Improvement Measure I-TR-5b: Protected Bicycle Lane Post-Implementation Surveys, has been revised as follows:

> **Improvement Measure I-TR-5b: ~~Cycle Track~~ Protected Bicycle Lane Post-Implementation Surveys.** Following implementation of the protected bicycle lanes ~~cycle tracks~~ on Howard, Folsom, Brannan, Third and Fourth Streets, the SFMTA could conduct motorist, pedestrian, bicycle, and business surveys to understand how the protected bicycle lanes ~~cycle tracks~~ are performing, and to make adjustments to the design and supplemental public education campaign. In addition to the user surveys, the post-implementation assessment could include before/after photos, bicyclist ridership and traffic volume counts, video analysis of behavior of bicyclists, pedestrians, and drivers, assessment of vehicle queuing, and compliance with new signs/signals. The information would be used as input for subsequent design and implementation of protected bicycle lanes ~~cycle tracks~~ on other streets in San Francisco, as well as documenting the effectiveness of the protected bicycle lane ~~cycle track~~.

* On Draft EIR p. IV.D-68, the impact statement has been revised as follows:

> **Impact TR-6: Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial and passenger loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply,**

would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles or pedestrians. (Significant and Unavoidable with Mitigation)

* On Draft EIR p. IV.D-70, the second to last sentence of the second paragraph has been revised:

> … future development. The failure to provide an adequate supply of off-street commercial loading spaces for individual projects, along with the increased demand in on-street commercial and passenger loading, and the removal of commercial loading spaces currently used by existing buildings in the area as described above, would exacerbate the impacts of elimination or reduction of on-street commercial loading spaces as part of the Plan's street network changes. …

* On Draft EIR p. IV.D-71, the fourth full sentence in the first paragraph has been revised:

> Given these considerations, the potential locations for replacing all on-street commercial loading spaces on streets where circulation changes are proposed (i.e., Folsom, Howard. Harrison, Bryant, Brannan, Third and Fourth Streets) are limited, and it is unlikely that a sufficient amount of spaces could be provided to offset the net loss in supply and the increased demand of on-street commercial and passenger loading spaces from the individual projects.

* On Draft EIR p. IV.D-73, Mitigation Measure M-TR-6a, Driveway and Loading Operations Plan (DLOP), has been revised as follows:

> **M-TR-6a: Driveway and Loading Operations Plan (DLOP).** Sponsors of development projects that provide more than 100,000 square feet of residential, office, industrial, or commercial uses shall prepare a DLOP, and submit the plan for review and approval by the Planning Department and the SFMTA in order to reduce potential conflicts between driveway operations, including loading activities, and pedestrians, bicycles and vehicles, and to maximize reliance of on-site loading spaces to accommodate new loading demand. The DLOP shall be submitted along with a building permit and approval should occur prior to the certificate of occupancy.
>
> Prior to preparing the DLOP, the project sponsor shall meet with the Planning Department and the SFMTA to review the proposed number, location, and design of the on-site loading spaces, as well as the projected loading demand during the entitlement/environmental review process. In addition to reviewing the on-site loading spaces and projected loading demand, the project sponsor shall provide the Planning Department and SFMTA a streetscape plan that shows the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way. In the event that the number of on-site loading spaces does not accommodate the projected loading demand for the proposed development, the project sponsor shall pursue with the SFMTA conversion of nearby on-street parking spaces to commercial loading spaces, if determined feasible by the SFMTA.
>
> The DLOP shall be revised to reflect changes in accepted technology or operation protocols, or changes in conditions, as deemed necessary by the Planning Department and the SFMTA. The DLOP shall include the following components, as appropriate to the type of development and adjacent street characteristics:
>
> - *Loading Dock Management.* To ensure that off-street loading facilities are efficiently used, and that trucks that are longer than can be safely accommodated are not permitted to use a building's loading dock, the project sponsor of a development project in the Plan Area shall develop a plan for management of the building's loading dock and shall ensure that tenants in

the building are informed of limitations and conditions on loading schedules and truck size. The management plan could include strategies such as the use of an attendant to direct and guide trucks, installing a "Full" sign at the garage/loading dock driveway, limiting activity during peak hours, installation of audible and/or visual warning devices, and other features. Additionally, as part of the project application process, the project sponsor shall consult with the SFMTA concerning the design of loading and parking facilities.

- *Garage/Loading Dock Attendant.* If warranted by project-specific conditions, the project sponsor of a development project in the Plan Area shall ensure that building management employs attendant(s) for the project's parking garage and/or loading dock, as applicable. The attendant would be stationed as determined by the project-specific review analysis, typically at the project's driveway to direct vehicles entering and exiting the building and avoid any safety-related conflicts with pedestrians on the sidewalk during the a.m. and p.m. peak periods of traffic, bicycle, and pedestrian activity, with extended hours as dictated by traffic, bicycle and pedestrian conditions and by activity in the project garage and loading dock. Each project shall also install audible and/or visible warning devices, or comparably effective warning devices as approved by the Planning Department and/or the SFMTA, to alert pedestrians of the outbound vehicles from the parking garage and/or loading dock, as applicable.

- *Large Truck Access.* The loading dock attendant shall dictate the maximum size of truck that can be accommodated at the on-site loading area. In order to accommodate any large trucks (i.e., generally longer than 40 feet) that may require occasional access to the site (e.g., large move-in trucks that need occasional access to both residential and commercial developments), the DLOP shall include procedures as to the location of on-street accommodation, time of day restrictions for accommodating larger vehicles, and procedures to reserve available curbside space on adjacent streets from the SFMTA.

- *Trash/Recycling/Compost Collection Design and Management.* When designs for buildings are being developed, the project sponsor or representative shall meet with the appropriate representative from Recology (or other trash collection firm) to determine the location and type of trash/recycling/compost bins, frequency of collections, and procedures for collection activities, including the location of Recology trucks during collection. The location of the trash/recycling/compost storage room(s) for each building shall be indicated on the building plans prior to submittal of plans to the Building Department. Procedures for collection shall ensure that the collection bins are not placed within any sidewalk, bicycle facility, parking lane or travel lane adjacent to the project site at any time.

- Delivery Storage. Design the loading dock area to allow for unassisted delivery systems (i.e., a range of delivery systems that eliminate the need for human intervention at the receiving end), particularly for use when the receiver site (e.g., retail space) is not in operation. Examples could include the receiver site providing a key or electronic fob to loading vehicle operators, which enables the loading vehicle operator to deposit the goods inside the business or in a secured area that is separated from the business.

The final DLOP and all revisions shall be reviewed and approved by the Environmental Review Officer or designee of the Planning Department and the Sustainable Streets Director or designee of the SFMTA. The DLOP will be memorialized in the notice of special restrictions on the project site permit.

* On Draft EIR p. IV.D-74, Mitigation Measure M-TR-6b, Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones, has been revised as follows to:

M-TR-6b: Accommodation of On-street Commercial Loading Spaces and Passenger Loading/Unloading Zones. The SFMTA shall develop a curb management strategy (strategy) for Central SoMa or within proximity of the street network changes that articulates curb use priorities for different types of streets, while safely managing loading demands. This strategy should guide the approach to any affected commercial and passenger loading/unloading zones (loading zones) during any City agency's development of detailed plans for each segment of the proposed street network changes. Replacement of loading zones will be considered, to the extent feasible. ~~detailed plans for each segment of the proposed street network changes that identify existing on-street commercial loading spaces and passenger loading/unloading zones, and then identify how demand within the existing loading facilities could be accommodated with the proposed street network changes. The detailed design shall also consider on-street loading supply needs for new development, as well as driveway access to loading facilities within existing and future buildings along the affected segments. The detailed design for each segment shall be prepared within a reasonable time frame of physical implementation to ensure that future land use conditions are reflected.~~

~~As part of detailed design for each affected street the SFMTA shall conduct the following:~~

1. ~~Document the existing commercial loading spaces and passenger loading/unloading zones at the time of detailed design.~~
2. ~~Conduct loading demand surveys/observation at appropriate times of day for each type of loading activity, to determine the actual demand associated with the on-street spaces and the need to replace or augment the on-street commercial loading spaces.~~
3. ~~Identify replacement commercial loading spaces and passenger loading/unloading spaces. Commercial loading spaces should be prioritized over parking spaces, and, to the extent feasible, the replacement commercial loading spaces shall be of similar length on the same block and side of the street. Where commercial loading spaces would be permanently removed, install new commercial loading spaces within 250 feet on adjacent side streets if feasible.~~
4. ~~At each location where passenger loading/unloading zones would be eliminated, contact the permit holder to determine adequacy of alternate locations and/or need for the passenger loading/unloading space. In some locations, such as schools and hotels, passenger loading/unloading activities could be accommodated within commercial loading spaces, with time of day restrictions.~~
5. ~~Conduct business surveys and review detailed plans with merchant associations or other local stakeholders to determine need for commercial loading spaces.~~
6. ~~Develop and implement a public education campaign regarding the street network changes, reduction or elimination of on-street parking spaces, location of replacement commercial loading spaces, and any time-of-day restrictions. On streets where on-street parking would be completely eliminated, provide information regarding commercial loading space supply on adjacent streets. In addition, provide information regarding *California Vehicle Code* §22500 and *San Francisco Transportation Code* §7.2.70 that loading activities (either truck or passenger loading/unloading) should not occur while stopped in any crosswalk, bicycle lane or travel lane.~~

The SFMTA and the Planning Department ~~shall~~ should develop protocols for ongoing assessment of commercial loading needs on the affected streets, and for review of new development projects along the

affected street segments to identify needed changes to the street network design (e.g., when a new driveway to a development site is required), or need for additional on-street commercial loading spaces.

~~In addition, the SFMTA shall explore the potential to develop and implement an off-hour delivery program to shift delivery windows for commercial deliveries to times when conflicts are less likely to occur. Such a program could be implemented as a pilot project, similar to the pilot project conducted in New York City in 2009–2010. Most commercial loading spaces in Central SoMa are metered, and the off-hour delivery program can include pricing to reduce the amount of time vehicles park, stand or stop at the curb, so that spaces turn over for more users, and double parking is minimized.~~

On Draft EIR p. IV.D-80, the first sentence of the third full paragraph has been revised as follows to clarify the distance noted:

The Plan's proposed street network changes would result in fewer mixed-flow travel lanes on a number of streets, which would reduce the available capacity for vehicles and thereby increase the number of vehicles in the remaining travel lanes, reduce the roadway width available for drivers to pull over to allow emergency vehicles to pass (e.g., due to raised buffers associated with ~~cycle tracks~~ protected bicycle lanes), and result in additional vehicle delay on these streets; however, the Plan's street network changes would not cause any complete permanent roadway closures or disruption to emergency vehicle access (the exception would be the closure of Essex Street which extends for one block (550 feet) between Folsom and Harrison Streets). …

* On Draft EIR p. IV.D-81, Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, has been modified to clarify SFMTA's consultation process with the San Francisco Fire Department regarding street network modifications that could affect emergency vehicle access:

Mitigation Measure M-TR-8: Emergency Vehicle Access Consultation. For street network projects that reduce the number of available vehicle travel lanes for a total distance of more than one block where transit-only lanes are not provided: Street network projects shall be designed to comply with adopted city codes regarding street widths, curb widths, and turning movements. To the degree feasible while still accomplishing safety-related project objectives, SFMTA shall design street network projects to include features that create potential opportunities for cars to clear travel lanes for emergency vehicles. Examples of such features include: curbside loading zones, customized signal timing, or other approaches developed through ongoing consultation between SFMTA and the San Francisco Fire Department. ~~During the design phase of each street network project, SFMTA shall consult with emergency service providers, including the San Francisco Fire Department and the San Francisco Police Department. Through the consultation process, the street network design shall be modified as needed to maintain emergency vehicle access. SFMTA shall identify design modifications through this process, as needed to meet the following performance criteria:~~

- ~~No physical barriers shall be introduced that would preclude emergency vehicle access.~~

~~Street design modifications should achieve the goals of the project without precluding emergency vehicle access. Design modifications selected by SFMTA, as needed to meet the performance criteria, shall be incorporated into the final design of each street network project and could include, but shall not be limited to: mountable concrete buffers, mountable curbs and corner or sidewalk bulbs, modification of corner or sidewalk bulbs and curb locations to accommodate turning emergency vehicles, and emergency vehicle signal priority. Any subsequent changes to the streetscape designs shall be subject to a similar consultation process.~~

* On Draft EIR p. IV.D-81, the significance conclusion for Response TR-8 is revised to include additional mitigation measures:

> **Significance after Mitigation:** Implementation of Mitigation Measures M-TR-8, M-TR-3a, M-NO-1a, and M-AQ-5e would ensure that the significant emergency vehicle access impact would be reduced to a ***less-than-significant*** level.

* On Draft EIR p. IV.D-83, the reference to the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) in the second paragraph of Mitigation Measure M-TR-9 has been deleted as this is not the correct process by which sponsors or contractors consult with Departments in the City and County of San Francisco. Revised text clarifying the process has been added to the measure:

> If construction of the proposed project is determined to overlap with nearby adjacent project(s) as to result in transportation-related impacts, the project sponsor or its contractor(s) shall consult with various City departments such as the SFMTA and Public Works ~~through ISCOTT~~, and other interdepartmental meetings as deemed necessary by the SFMTA, Public Works, and the Planning Department, to develop a Coordinated Construction Management Plan. ~~The Coordinated Construction Management Plan that shall address construction related vehicle routing, detours, and maintaining transit, bicycle, vehicle, and pedestrian movements in the vicinity of the construction area for the duration of the construction period overlap. Key coordination meetings shall be held jointly between project sponsors and contractors of other projects for which the City departments determine construction impacts could overlap.~~ The Coordinated Construction Management Plan, to be prepared by the contractor, would be reviewed by the SFMTA and would address issues of circulation (traffic, pedestrians, and bicycle), safety, parking and other project construction in the area. Based on review of the construction logistics plan, the project may be required to consult with SFMTA Muni Operations prior to construction to review potential effects to nearby transit operations.

On Draft EIR p. IV-D.84, the first bullet of Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination, has been revised as follows to clarify the limitation of construction truck access during peak commute hours:

- *Restricted Construction Truck Access Hours*—Limit construction truck movements ~~to~~ during the hours between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 7:00 p.m., ~~or~~ and other times if ~~approved~~ required by the SFMTA, to minimize disruption to vehicular traffic, including transit during the a.m. and p.m. peak periods.

* On Draft EIR p. IV-D.84, the third bullet of Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination, has been revised as follows as ISCOTT is not the correct process by which sponsors or contractors consult with Departments in the City and County of San Francisco.

- *Coordination of Temporary Lane and Sidewalk Closures*—The project sponsor shall coordinate travel lane closures with other projects requesting concurrent lane and sidewalk closures through ~~the ISCOTT and~~ interdepartmental meetings process above, to minimize the extent and duration of requested lane and sidewalk closures. Travel lane closures shall be minimized especially along transit and bicycle routes, so as to limit the impacts to transit service and bicycle circulation and safety.

On Draft EIR p. IV.D-90, the sources of Table IV.D-18 are revised as follows:

SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); Fehr & Peers, 2016.

On Draft EIR p. IV.D-92, the sources of Table IV.D-19 are revised as follows:

SOURCES: SF Planning Department Memorandum, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2013 Muni ridership data); Fehr & Peers, 2016.

On Draft EIR p. IV.D-94, the sources of Table IV.D-20 are revised as follows:

SOURCES: SF Planning Department Memoranda, *Transit Data for Transportation Impact Studies*, May 2015 (based on 2012 regional transit ridership data), and *Updated BART Regional Screenlines*, October 2016; Fehr & Peers, 2016.

* On Draft EIR p. IV-D.104, the impact statement has been revised:

Impact C-TR-6: Development under the Plan, including the proposed open space improvements and the street network changes, and the associated increased demand of on-street loading, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative loading impacts.

* On Draft EIR p. IV-D.105, the following revisions have been made to the first full sentence of the first paragraph:

… and pedestrians. Thus, development under the Plan with increased demand of on-street loading and in combination with street network changes associated with other cumulative projects, such as the Transit Center District plan or the Second Street Improvement Project to the east, the Sixth Street Improvement project to the west, and the Muni Forward Travel Time Reduction Proposal (TTRP) project on Mission Street to the north, could result in cumulative loading impacts. …

* On Draft EIR, p. V-2, the impact statements have been revised:

Impact TR-6: Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles or pedestrians. (Significant and Unavoidable with Mitigation)

Impact C-TR-6: Development under the Plan, including the proposed open space improvements and the street network changes, and the associated increased demand of on-street loading, in combination with past, present, and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative loading impacts.

On Draft EIR p. IV-D.107, the last two sentences of the first partial paragraph have been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

… As noted in section "Regulatory Framework" above, on February 7, 2017, ~~the Planning Department is currently pursuing an ordinance amending the *Planning Code* to establish a citywide TDM Program. Resolution 19628 of intent to initiate the *Planning Code* amendments was approved by the Planning Commission on August 4, 2016. If the proposed Planning Code amendments are legislated by~~ the Board

of Supervisors approved Ordinance No. 34-17, adopting a citywide TDM Program. Therefore, development projects within the Plan Area would be subject to the requirements of the TDM Program.

E.10 Section IV.E, Noise and Vibration

On Draft EIR p. IV.E-5, the first full sentence of the first partial paragraph has been revised as follows to clarify the distance noted:

> … This location is two blocks (about 1,750 feet) east of San Francisco Fire Department Station No. 1 at 935 Folsom Street, and is on the route that fire apparatus travel when responding to calls north and east of the station, because all major streets in the area are one-way. …

* On Draft EIR p. IV-E.16, the second (parenthetical) sentence of the last paragraph is revised as follows to correct an editorial error:

> (Table IV.E-5 also includes, for comparison, street segments where traffic noise would increase by three dBA or more under cumulative conditions, as discussed in Impact C-NO-1 and Table IV.E-8.~~Affected street segments within the study area are also shown in Figure IV.E 1.~~)

* On Draft EIR p. IV-E.18, the following text has been added at the end of the fourth paragraph to explain why 100 percent affordable housing projects in the Central SoMa Plan Area are exempt from the requirements of Mitigation Measure M-NO-1a:

> **Mitigation Measure M-NO-1a, Transportation Demand Management for New Development**, would reduce traffic noise by reducing traffic volumes generated in the study area. The Transportation Demand Management (TDM) measures would encourage drivers to switch to alternative modes of travel, such as walking, biking, and transit. However, it cannot be stated with certainty that the reduction in traffic volume would be sufficient to avoid significant impacts to existing land uses in and near the study area. This mitigation measure would not apply to 100 percent affordable housing projects. As detailed in the Transportation Demand Management Technical Justification[248a], 100 percent affordable housing projects generally do not include much accessory parking and data indicates that affordable housing reduces VMT. A review of 100 percent affordable housing projects built in San Francisco between 2006 and 2015 show that 50 of 63 projects were built with little (20 accessory parking spaces or fewer) to no accessory parking.

On Draft EIR p. IV.E-21, Mitigation Measure M-NO-1a has been revised as follows to further clarify the applicability of this mitigation measure for subsequent development projects:

> **Mitigation Measure M-NO-1a: Transportation Demand Management for New Development Projects.** To reduce vehicle noise from subsequent development projects in the Plan Area, the project sponsor and subsequent property owners (excluding 100 percent affordable housing projects) shall develop and implement a TDM Plan for a proposed project's net new uses (including net new accessory parking spaces) as part of project approval. The scope and number of TDM measures included in the TDM Plan shall be in accordance with Planning Department's TDM Program Standards for the type of

[248a] Wade Wietgrefe, San Francisco Planning Department, "TDM Technical Justification". January 10, 2018. Accessed March 15, 2018.

development proposed, and accompanying appendices.[250] The TDM Program Standards and accompanying appendices are expected to be refined as planning for the proposed TDM Ordinance continues. Each subsequent development project's TDM Plan for proposed net new uses shall conform to the most recent version of the TDM Program Standards and accompanying appendices available at the time of the project Approval Action, as Approval Action is defined in Section 31.04(h) of the San Francisco Administrative Code. The Planning Department shall review and approve the TDM Plan, as well as any subsequent revisions to the TDM Plan. The TDM Plan shall target a reduction in the vehicle miles traveled (VMT) rate (i.e., VMT per capita), monitor and evaluate project performance (actual VMT), and adjust TDM measures over time to attempt to meet VMT target reduction. This measure is applicable to all projects within the Plan Area that do not otherwise qualify for an exemption under Article 19 of the CEQA Guidelines. This measure ~~may be~~ is superseded for those projects that are already required to fully comply with the ~~if a comparable~~ TDM Program Standards ~~Ordinance is adopted that~~ (i.e., without reductions in target requirements) in the Plan Area. ~~The TDM Plan shall be developed by the project sponsor for each particular development project, and shall aim to achieve the maximum VMT rate reduction feasible.~~ The TDM Plan shall be developed in consultation with the Planning Department and rely generally on implementation of measures listed in ~~*Updating Transportation Impacts Analysis in the CEQA Guidelines* document published by California Office of Planning and Research on August 6, 2014, or whatever document supersedes it, and~~ the Planning Department TDM Program Standards and accompanying appendices in effect at the time of the Project Approval Action. The TDM program may include, but is not limited to the types of measures, which are summarized below for explanatory example purposes. Actual development project TDM measures shall be applied from the TDM Program Standards and accompanying appendices, which describe the scope and applicability of candidate measures in detail:

1. Active Transportation: Provision of streetscape improvements to encourage walking, secure bicycle parking, shower and locker facilities for cyclists, subsidized ~~bike~~ bicycle share memberships for project occupants, bicycle repair and maintenance services, and other bicycle-related services;
2. Car-Share: Provision of car-share parking spaces and subsidized memberships for project occupants;
3. Delivery: Provision of amenities and services to support delivery of goods to project occupants;
4. Family-Oriented Measures: Provision of on-site childcare and other amenities to support the use of sustainable transportation modes by families;
5. High-Occupancy Vehicles: Provision of carpooling/vanpooling incentives and shuttle bus service;
6. Information: Provision of multimodal wayfinding signage, transportation information displays, and tailored transportation marketing services;
7. Land Use: Provision of on-site affordable housing and healthy food retail services in underserved areas; and
8. Parking: Provision of unbundled parking, short term daily parking provision, parking cash out offers, and reduced off-street parking supply.

[250] San Francisco Planning Department, ~~*Draft* *TDM Program Standards*, July 2016~~ February 2017, and accompanying appendices, which implements the adopted TDM Ordinance (Ordinance No. 34-17, effective March 19 2017), http://sf-planning.org/tdm-materials-and-resources, accessed on ~~September 19, 2016~~ July 13, 2017.

Footnote:

[250] San Francisco Planning Department, ~~Draft~~ *TDM Program Standards*, ~~July 2016~~ February 2017, and accompanying appendices, which implements the adopted TDM Ordinance (Ordinance No. 34-17, effective March 19 2017), http://sf-planning.org/tdm-materials-and- resources, accessed on ~~September 19, 2016~~ July 13, 2017.

On Draft EIR p. IV-E.22, the first full sentence of the first partial paragraph has been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

> … The TDM Program Standards and accompanying appendices ~~are expected to~~ may be refined by the Planning Commission from time to time ~~as planning for the proposed TDM Ordinance continues~~. …

On Draft EIR p. IV.E-23, Mitigation Measure M-NO-1b has been revised as follows to clarify the range of development types that would require implementation of noise analysis for new development:

> **Mitigation Measure M-NO-1b: Siting of Noise-Generating Uses.** To reduce potential conflicts between existing sensitive receptors and new noise-generating uses, for new development including PDR, Place of Entertainment, or other uses such as the siting of new emergency generators/fire pumps or noisier-than-typical mechanical equipment, and facilities that generate substantial nighttime truck and/or bus traffic that would potentially generate noise levels substantially in excess of ambient noise (either short-term during the nighttime hours, or as a 24-hour average), the Planning Department shall require the preparation of a noise analysis that includes, at a minimum, a site survey to identify potential noise-sensitive uses within 900 feet of, and that have a direct line-of-sight-to, the project site, and including at least one 24-hour noise measurement (with maximum noise level readings taken so as to be able to accurately describe maximum levels reached during nighttime hours), prior to the first project approval action. The analysis shall be prepared by persons qualified in acoustical analysis and/or engineering and shall demonstrate ~~with reasonable certainty that the proposed use would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use~~ that the proposed use would meet the noise standard identified in San Francisco Police Code Article 29. Should ~~such~~ any concerns be present, the Department ~~may~~ shall require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering ~~prior to the first project approval action~~, and the incorporation of noise reduction measures as recommended by the noise assessment prior to the first project approval action.

* The last paragraph on Draft EIR p. IV.E-24 and the first paragraph on p. IV.E-25 are revised to clarify that construction noise from individual buildings would be reduced to less-than-significant levels with implementation of Mitigation Measure M-NO-2a, General Construction Noise-Control Measures, and Mitigation Measure M-NO-2b, Noise Control Measures for Pile Driving:

> Similarly, the duration of noise experienced by receptors may be increased due to overlapping construction projects. Compliance with the *Police Code* and implementation of **Mitigation Measure M-NO-2a, General Construction Noise-Control Measures**, would reduce construction noise to the maximum feasible extent. With implementation of this measure, construction noise from individual ~~development~~ building projects within the Plan Area would be reduced to levels that would not substantially exceed ambient noise, thus reducing potential construction-related noise impacts on adjacent or nearby noise-sensitive receptors to a less-than-significant level at individual ~~development~~ building sites. However, if multiple ~~projects~~ buildings were under construction simultaneously in close proximity to the same sensitive receptors, the combined effect of these construction noise impacts may result in noise levels for which the available, feasible measures identified in Mitigation Measure M-NO-2a would be insufficient to reduce noise impacts to a less-than-significant level. Therefore,

potential construction-related noise impacts on adjacent or nearby noise-sensitive receptors would be ***significant and unavoidable***.

In the event that pile driving is required for a subsequent development project, the sponsor of that project would be required to implement **Mitigation Measure M-NO-2b, Noise Control Measures for Pile Driving**, which would reduce pile-driving noise impacts to a less-than-significant level at individual ~~development~~ building sites. However, as stated above for standard construction noise impacts, if multiple ~~projects~~ buildings involving pile driving were to be under construction simultaneously in close proximity to the same sensitive receptors, the combined effect of these noise impacts may result in noise levels for which the available, feasible measures identified in Mitigation Measure M-NO-2b would be insufficient to reduce the construction-related noise impacts to a less-than-significant level. Therefore, adverse impacts from pile-driving noise upon sensitive receptors near multiple construction sites would be ***significant and unavoidable***.

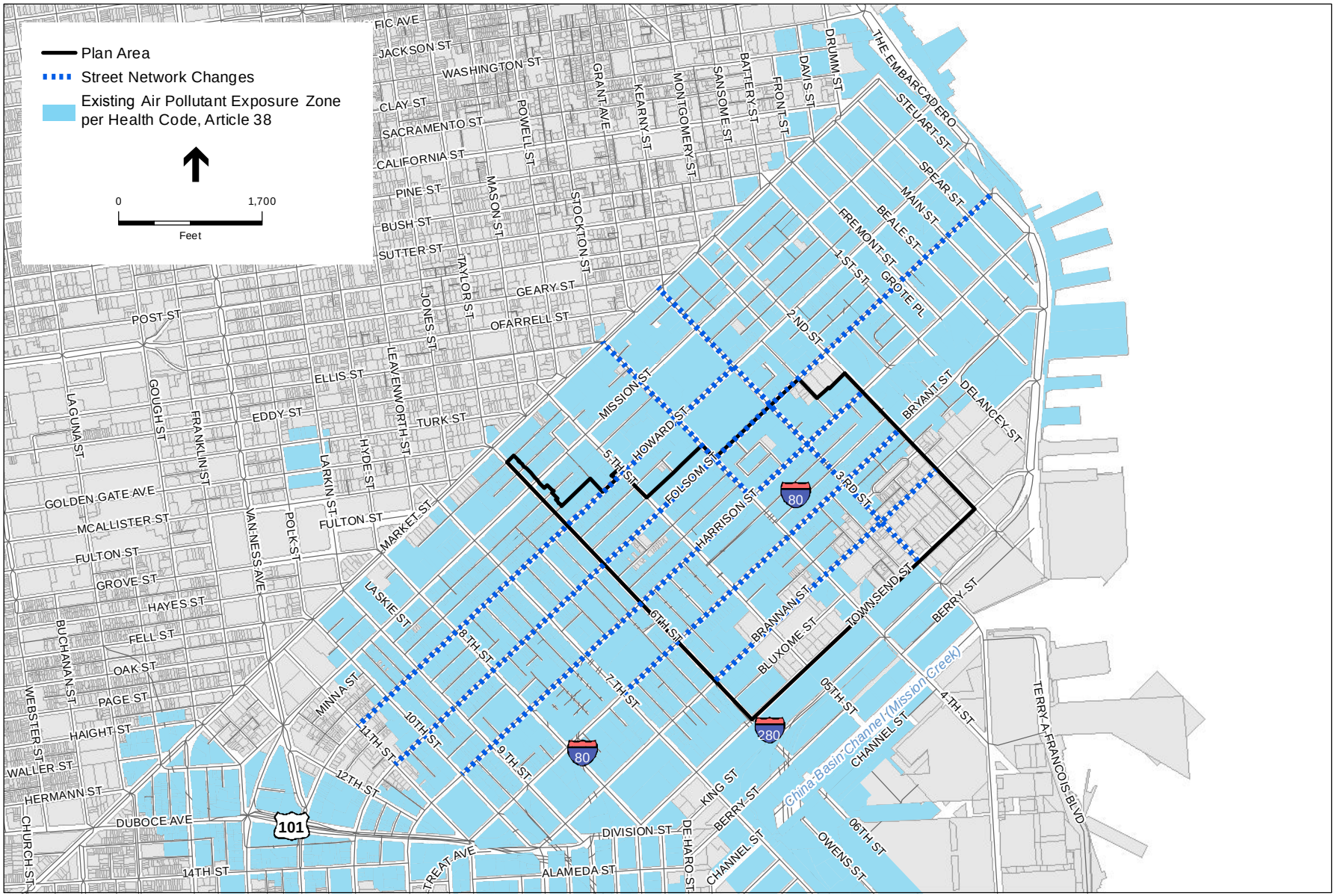
* On Draft EIR p. IV.E-27, the first full paragraph is also revised to clarify that construction noise from individual buildings would be reduced to less-than-significant levels with implementation of Mitigation Measure M-NO-2a, General Construction Noise-Control Measures, and Mitigation Measure M-NO-2b, Noise Control Measures for Pile Driving:

Significance after Mitigation: Implementation of Mitigation Measures M-NO-2a and M-NO-2b would reduce the noise impact from future construction throughout the Plan Area to a less-than-significant level from individual ~~construction~~ building sites. However, as discussed in Chapter IV, Overview, under Subsequent Development Projects, a number of projects have environmental applications on file and are dependent upon the Central SoMa Plan's proposed zoning. It is possible that such projects, some of which are located in close proximity to each other, or multiple buildings on the same project site, could be under construction at the same time. The combined effect of these noise impacts may result in noise levels for which available feasible mitigation measures may not be sufficient to reduce the impact to less than significant. Thus, this impact is conservatively judged to be ***significant and unavoidable***.

E.11 Section IV.F, Air Quality

* On Draft EIR p. IV.F-11, the legend of Figure IV.F-1, Air Pollutant Exposure Zone in the Plan Area and Street Network Changes, has been revised as follows to correct an editorial error:

Existing ~~Proposed~~ Air Pollutant Exposure Zone per Health Code, Article 38.



SOURCE: City of San Francisco, 2016; ESA, 2014

Case No. 2011.1356E: Central SoMa Plan

Figure IV.F-1

Air Pollutant Exposure Zone in the Plan Area and Street Network Changes [Revised]

* On Draft EIR p. IV.F-32, the following is added as a new paragraph just prior to the mitigation conclusion to add to the Final EIR a discussion of the Plan's consistency with the 2017 Clean Air Plan, which was adopted subsequent to publication of the Draft EIR:

> Subsequent to publication of the Draft EIR, on April 19, 2017, the BAAQMD adopted the Spare the Air, Cool the Climate, its 2017 CAP (2017 Plan). Like the 2010 Clean Air Plan, the 2017 Plan includes control measures to reduce emissions of the ozone precursors ROG and NO_X and to reduce transport of ozone and its precursors to neighboring air basins, as well as to reduce emissions of $PM_{2.5}$ and TACs. The 2017 Plan also addresses the need for the Bay Area to reduce GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, consistent with the GHG reduction targets adopted by the state, and includes control measures to reduce GHG emissions either directly or as a co-benefit of reducing other pollutants. In the 2017 Plan, control measures are grouped into the following categories: stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants; as was the case in 2010, there is also a series of measures that are to undergo further study. As in 2010, the transportation control measures are those most applicable to the Central SoMa Plan. The transportation control measures in the 2017 Plan nearly all continue similar measures from the 2010 Clean Air Plan. Additionally, the 2017 Plan's transportation control measures incorporate certain mobile source measures from the 2010 Plan concerning reducing emissions from cars and light trucks, medium and heavy trucks, and construction, farming, and lawn care equipment. The 2017 Plan's transportation control measures also incorporate 2010 measure LUM-1, regarding reducing emissions from freight movement. The 2017 Plan includes new transportation control measures, including TR1, a measure to encourage telecommuting, especially on Spare the Air Days when air quality is predicted to be relatively poor, and TR17, TR20, and TR21 (measures to reduce emissions from aircraft, ocean-going vessels, and commercial harbor craft). The telecommuting measure would encourage employers to allow, and employees to participate in, telecommuting, and would provide grants and develop a pilot telecommuting project. Therefore, this measure is not directly applicable to the Central SoMa Plan (although telecommuting is consistent with vehicle trip reduction), nor are the aircraft and watercraft measures. Therefore, because the Central SoMa Plan was determined to be consistent with the transportation, mobile source, and land use measures in the 2010 Clean Air Plan that are comparable to control measures in the 2017 Plan and because new control measures of the 2017 Plan are not directly applicable, the Central SoMa Plan would be consistent with the control measures in the 2017 Plan. The other significance criteria for CAP consistency relate to support for the goals of the CAP and to avoid disrupting or hindering implementation of control measures identified in the CAP. The goals of the 2017 Plan are to attain all state and national air quality standards, eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants, and substantially reduce Bay Area GHG emissions. These goals are similar to those of the 2010 Clean Air Plan, with which the Central SoMa Plan was found consistent. In light of the foregoing, the Central SoMa Plan including subsequent development projects, proposed street network changes and open spaces improvements would be consistent with the 2017 Plan's control measures, would not hinder implementation of the 2017 Plan, and would support the primary goals of the 2017 Plan, and this impact would be **less than significant** with respect to the 2017 Plan, as well.

* On Draft EIR p. IV.F-37, Mitigation Measure M-AQ-3a has been revised as follows to clarify when the mitigation measure should be implemented:

> **Mitigation Measure M-AQ-3a: Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products.** Prior to receipt of any certificate of final occupancy ~~building permit~~ and every five years thereafter, the project sponsor shall develop electronic correspondence to be distributed

by email or posted on-site annually to tenants of the project that encourages the purchase of consumer products and paints that are better for the environment and generate less VOC emissions. The correspondence shall encourage environmentally preferable purchasing and shall include contact information and links to SF Approved.[143]

On Draft EIR p. IV.F-37, the fourth bullet of Mitigation Measure M-AQ-3b, Reduce Operational Emissions, has been revised as follows to clarify other types of mitigation measures that could be considered:

- Other measures that are shown to effectively reduce criteria air pollutant emissions onsite or offsite (e.g., mitigation offsets) if emissions reductions are realized within the SFBAAB. Measures to reduce emissions onsite are preferable to offsite emissions reductions.

* On Draft EIR, p. IV-F.51, an additional air quality mitigation measure has been added to reduce exposure of sensitive receptors as a result of the Plan implementation:

Mitigation Measure M-AQ-5e: Central SoMa Air Quality Improvement Strategy. The Central SoMa Plan is expected to generate $22 million in revenue dedicated to greening and air quality improvements. A portion of these monies shall be dedicated to identifying and exploring the feasibility and effectiveness of additional measures that would reduce the generation of, and/or exposure of such emissions to persons whose primary residence is within the Plan Area and whose residence does not provide enhanced ventilation that complies with San Francisco Health Code Article 38. Objective 6.5 of the Plan calls for improvements to air quality, with specific strategies to support reduced vehicle miles traveled, increased greening around the freeway to improve air quality and use of building materials and technologies that improve indoor and outdoor air quality. The Planning Department, in cooperation with other interested agencies or organizations, shall consider additional actions for the Central SoMa Plan Area with the goal of reducing Plan-generated emissions and population exposure including, but not limited to:

- Collection of air quality monitoring data that could provide decision makers with information to identify specific areas of the Plan where changes in air quality have occurred and focus air quality improvements on these areas;
- Additional measures that could be incorporated into the City's Transportation Demand Management program with the goal of further reducing vehicle trips;
- Incentives for replacement or upgrade of existing emissions sources;
- Other measures to reduce pollutant exposure, such as distribution of portable air cleaning devices; and
- Public education regarding reducing air pollutant emissions and their health effects.

The Department shall develop a strategy to explore the feasibility of additional air quality improvements within four years of plan adoption.

* On Draft EIR p. IV.F-51, the second paragraph in the Significance after Mitigation discussion has been revised due to the addition of Mitigation Measure M-AQ-5e:

Mobile sources generated by the Plan would significantly affect the geography and severity of the Air Pollutant Exposure Zone. Mitigation Measure M-NO-1a, Transportation Demand Management for New

[143] SF Approved (sfapproved.org) is administrated by the San Francisco Department of Environment staff, who identifies products and services that are safer and better for the environment (e.g., those that are listed as "Required" or "Suggested").

Developments, in Section IV.E, Noise and Vibration, would reduce the number of vehicle trips generated by the Plan~~, but~~. Mitigation Measure M-AQ-5e would establish a pilot program that would explore the feasibility and effectiveness of additional measures that would reduce the generation of, and/or exposure of persons to, emissions whose primary residence is within the Plan Area and whose residence does not provide enhanced ventilation that complies with San Francisco Health Code Article 38. However, because the degree to which trips (and thereby emissions) could be reduced by ~~these measures~~ M-NO-1a cannot be reliably estimated, and because vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicle, and~~ because no other feasible mitigations are available~~ it is unknown whether M-AQ-5e would effectively reduce exposure of sensitive receptors to less-than-significant levels, the impact of traffic generated TACs on existing sensitive receptors would be ***significant and unavoidable***.

E.12 Section IV.G, Wind

On Draft EIR p. IV.G-5, the second sentence of the last paragraph has been revised as follows to correct an editorial error:

> … Wind-tunnel testing and analysis was conducted for two discrete zones (study areas) within the Plan Area that are proposed to undergo the most extensive increases in height limits—the approximately ~~four~~five-block area between Bryant and Townsend Streets from the ~~west~~ east side of ~~Fifth~~ Sixth Street to the east side of Fourth Street, and Harrison Street between Second and Fourth Streets (just north of the I-80 freeway) (see **Figure IV.G-1, Wind Tunnel Test Areas**). …

On Draft EIR p. IV-G-14, Figure IV.G-3, Greatest Increases in Wind Speed, is corrected to show a total of five exceedances of the 26 mph wind hazard criterion.

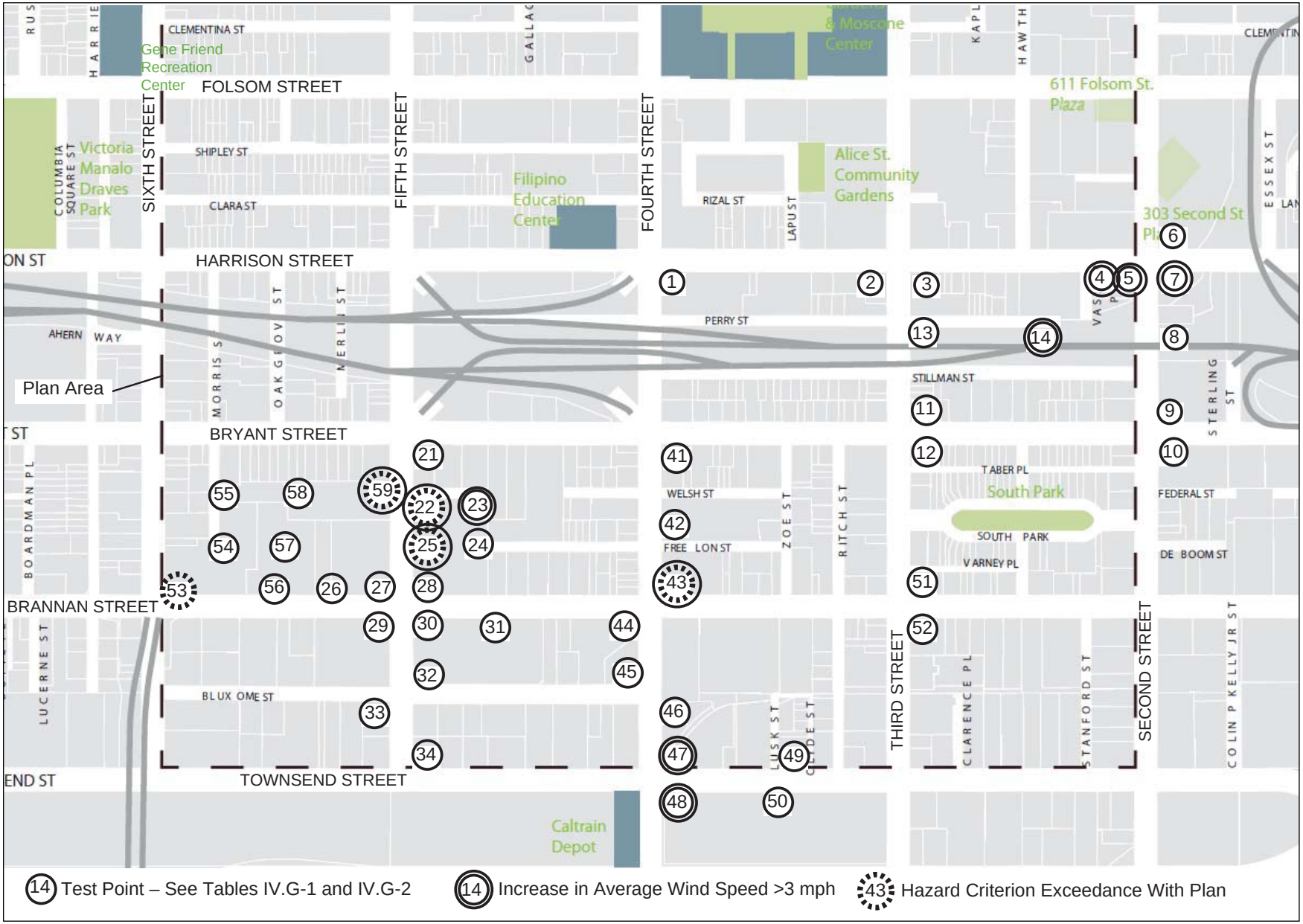
On Draft EIR p. IV.G-17, the first sentence of the last partial paragraph has been revised as follows to clarify the distance noted:

> Based on an evaluation of proposed, approved, and under-construction buildings within four blocks (about 3,500 feet) upwind and two blocks (about 1,200 feet) crosswind of the Plan Area, it was determined that no specific buildings that could be developed under the cumulative scenario would combine with the wind effects of the Plan to result in a substantial cumulative impact related to wind, beyond those identified for the Plan, above. …

E.13 Section IV.H, Shadow

On Draft EIR p. IV.H-1, the last sentence, continuing onto p. IV.H-2, has been revised as follows to clarify the distance noted:

> … South Park, in the block bounded by Bryant, Second, Brannan, and Third Streets, is the only Recreation and Park Department property in the Plan Area, although Gene Friend Recreation Center is across Sixth Street from the Plan Area and Victoria Manalo Draves Park ~~and Gene Friend Recreation Center are~~ is about a half a block (about 310 feet) west of the Plan Area's boundary, located in the middle of the block between Columbia Square and Sherman Street. …



SOURCE: ESA

Case No. 2011.1356E: Central SoMa Plan

Figure IV.G-3

Greatest Increases in Wind Speed [Revised]

On Draft EIR p. IV.H-5, the first sentence of the first paragraph under the heading "Gene Friend Recreation Center" has been revised as follows to clarify the distance noted:

> Gene Friend Recreation Center is located on a 1-acre parcel at the northwest corner of Sixth and Folsom Streets, ~~a block outside of~~ across Sixth Street from the Central SoMa Plan Area, within the Western SoMa. …

On Draft EIR p. IV.H-8, the first sentence under the heading "Yerba Buena Lane" has been revised as follows to clarify the distance noted:

> Yerba Buena Lane is a one-block-long (550-foot-long) public pedestrian passage north of the Plan Area that connects Market Street to Mission Street. …

On Draft EIR p. IV.H-10, the first sentence of the second full paragraph has been revised as follows to clarify the distance noted:

> As noted, the only park subject to Section 295 within the Plan Area is South Park, although Gene Friend Recreation Center is just across Sixth Street from the Plan Area, and Victoria Manalo Draves Park is less than one-half block (about 310 feet) west of the Plan Area. …

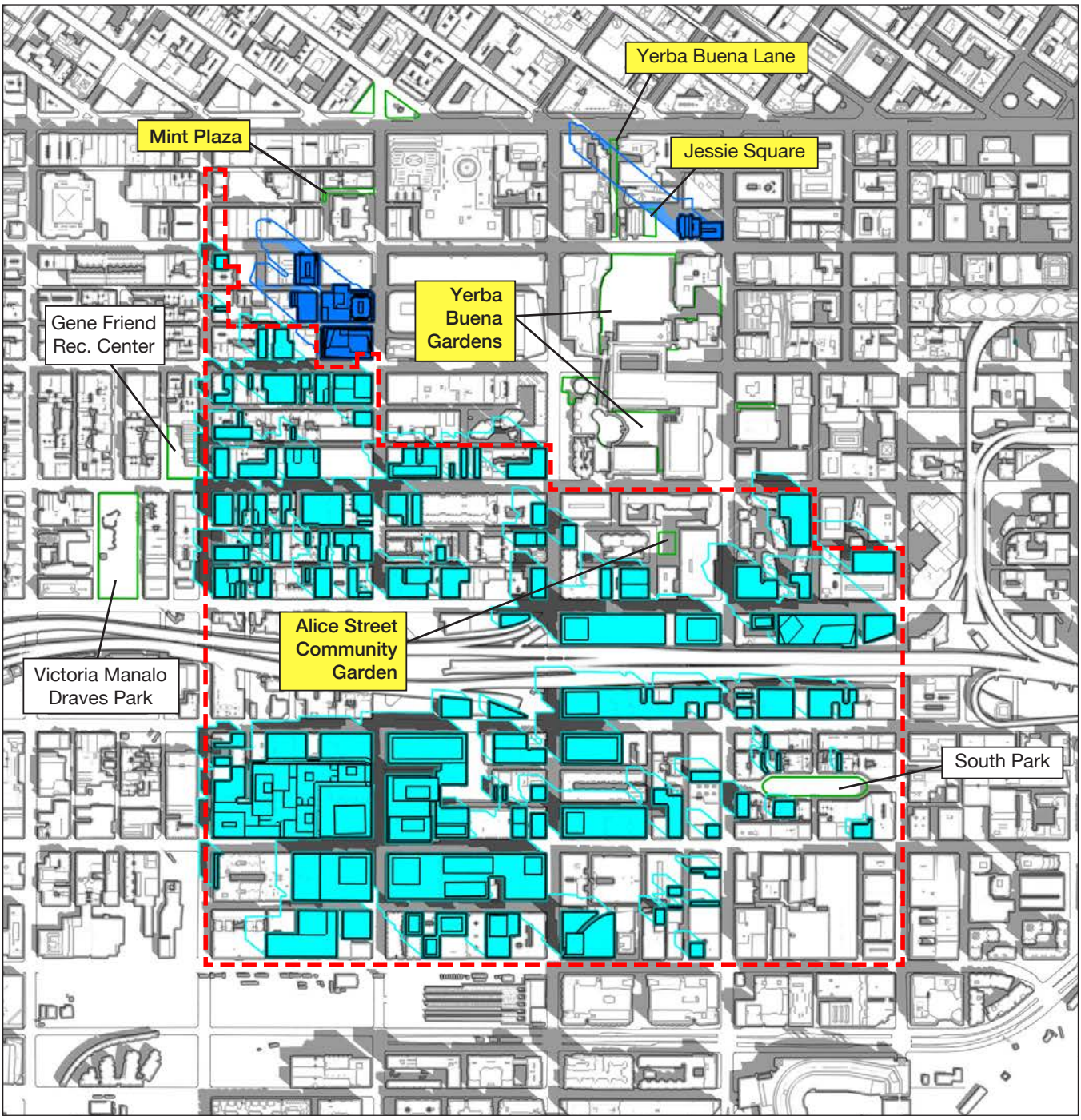
On Draft EIR pp. IV.H-12 through IV.H-20 and IV.H-23 through IV.H-34, Figure IV.H-2 through Figure IV.H-10, and Figure IV.H-17 through Figure IV.H-22, have been revised to incorporate the shadow effect of changes in the Height and Bulk Map:

* On Draft EIR p. IV.H-37, the third paragraph below the heading "Mint Plaza, Jessie Square, and Yerba Buena Lane" has been revised as follows to clarify that the three open spaces noted are not POPOS and to correct an editorial error:

> Based on the foregoing, none of the above ~~POPOS~~ open spaces would be adversely affected by shadow under the Plan ~~either option~~, and the effect would be ***less than significant***.

* On p. IV.H-38, the following revision is made to the paragraph following the heading "Conclusion" to correct an editorial error:

> Section 295 would not expressly prohibit CEQA-significant new shadow because it does not apply to buildings 40 feet or less in height, and because the Planning Commission, on the advice of the Recreation and Park Commission, could determine that new shadow would be insignificant pursuant to Section 295. However, based ~~Based~~ on the foregoing analysis, development pursuant to the Plan would not create new shadow in a manner that substantially affects the use of existing outdoor recreation facilities or other public areas. Additionally, the specific massing and design of a subsequent development project would be reviewed to determine whether the project could have shadow impacts not identified at this programmatic level of analysis. Therefore, the impact would be ***less than significant***.

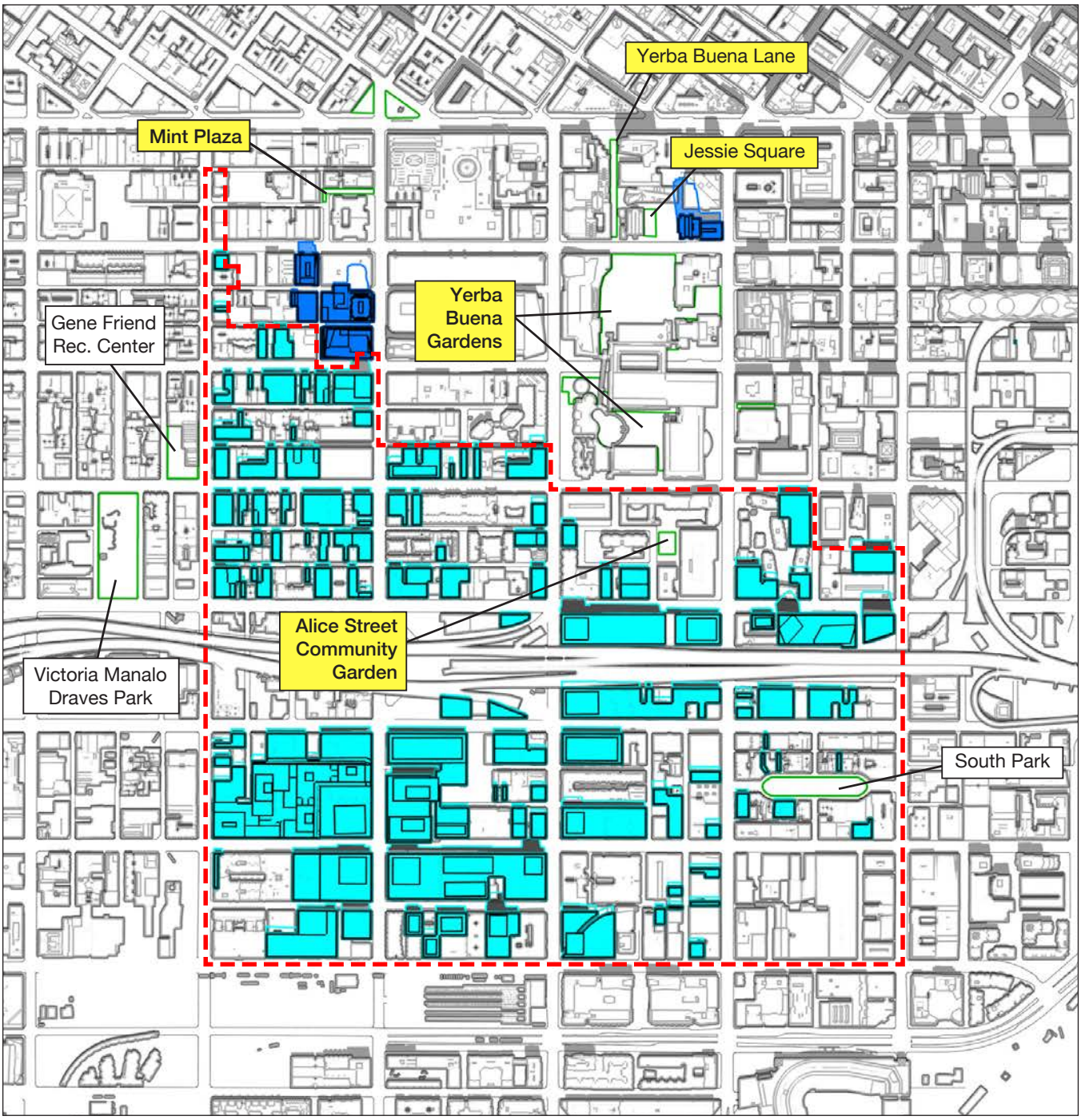


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-2

Shadows: June 21 (Summer Solstice) 9:00 a.m. [Revised]

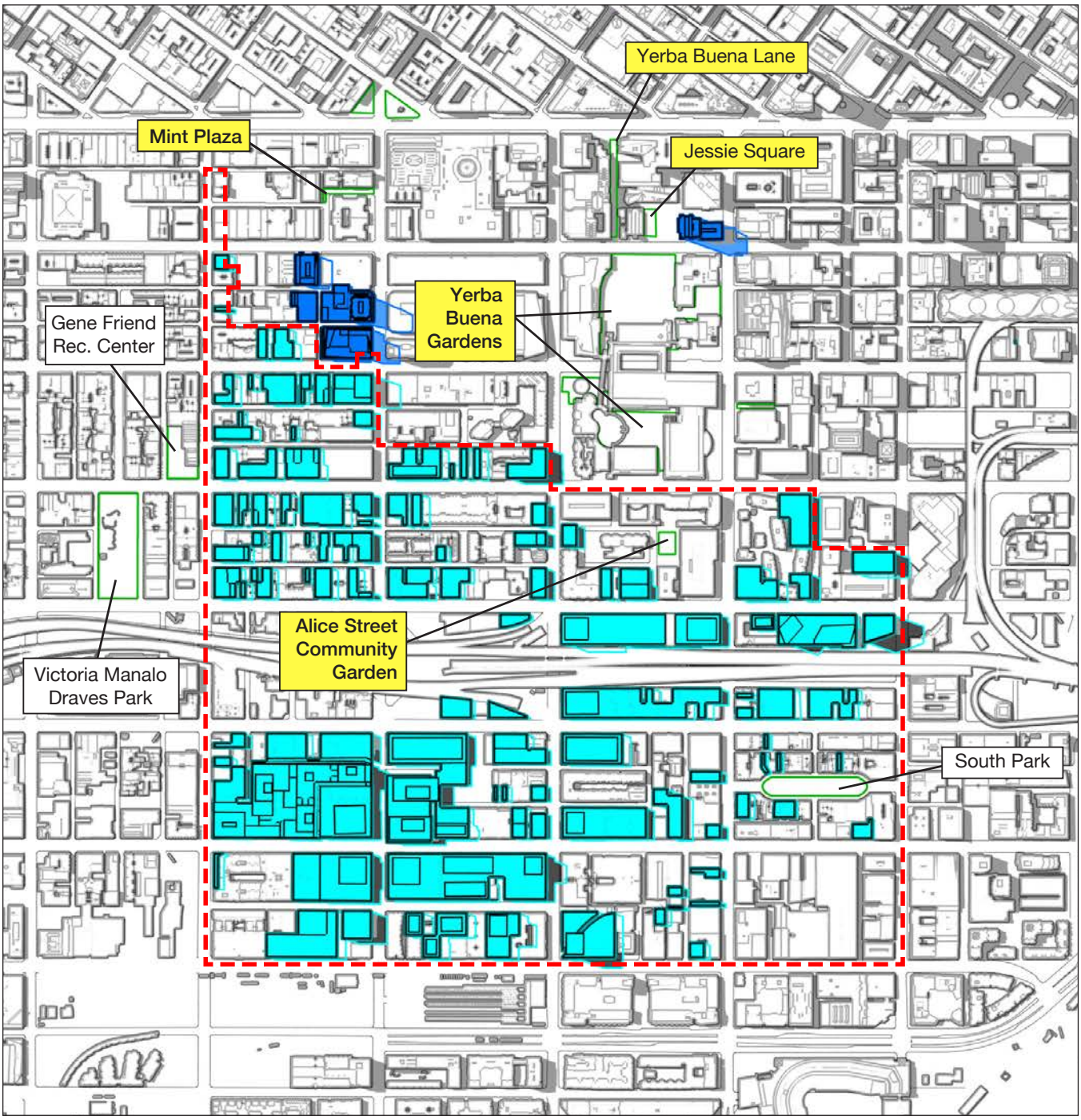


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-3

Shadows: June 21 (Summer Solstice) 12:00 noon [Revised]

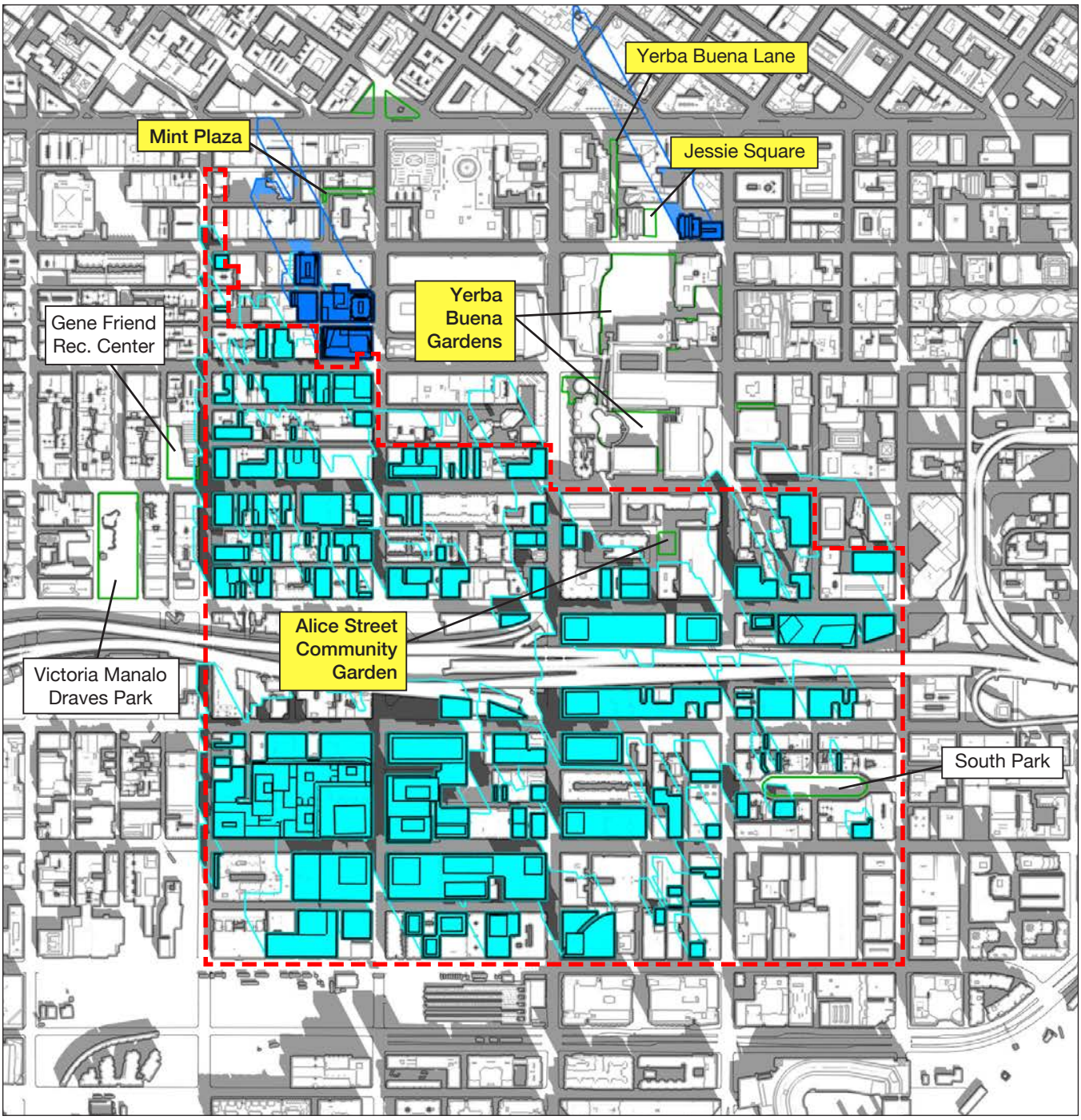


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-4

Shadows: June 21 (Summer Solstice) 3:00 p.m. [Revised]

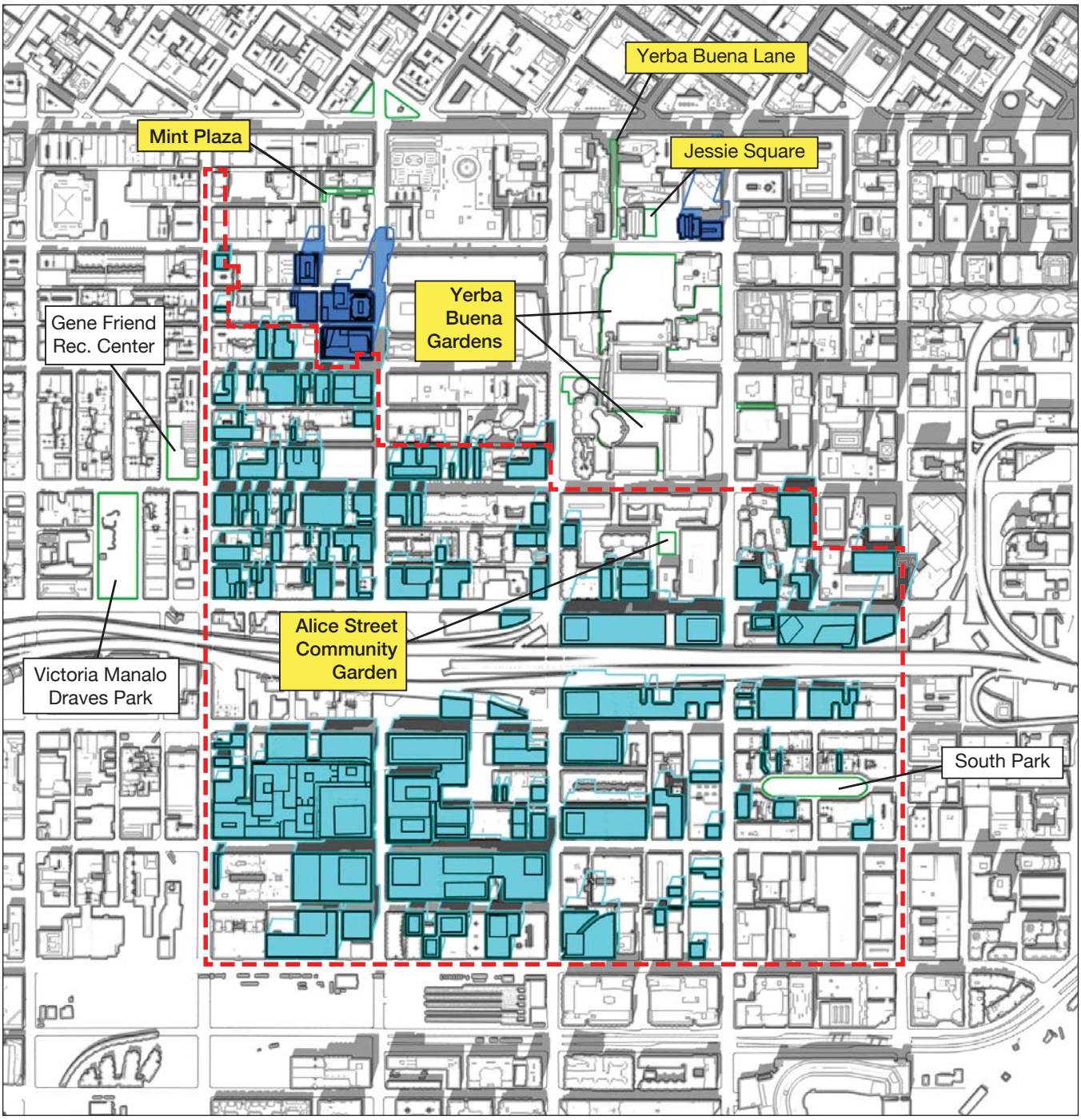


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-5

Shadows: September 20 (Fall Equinox) 9:00 a.m. [Revised]

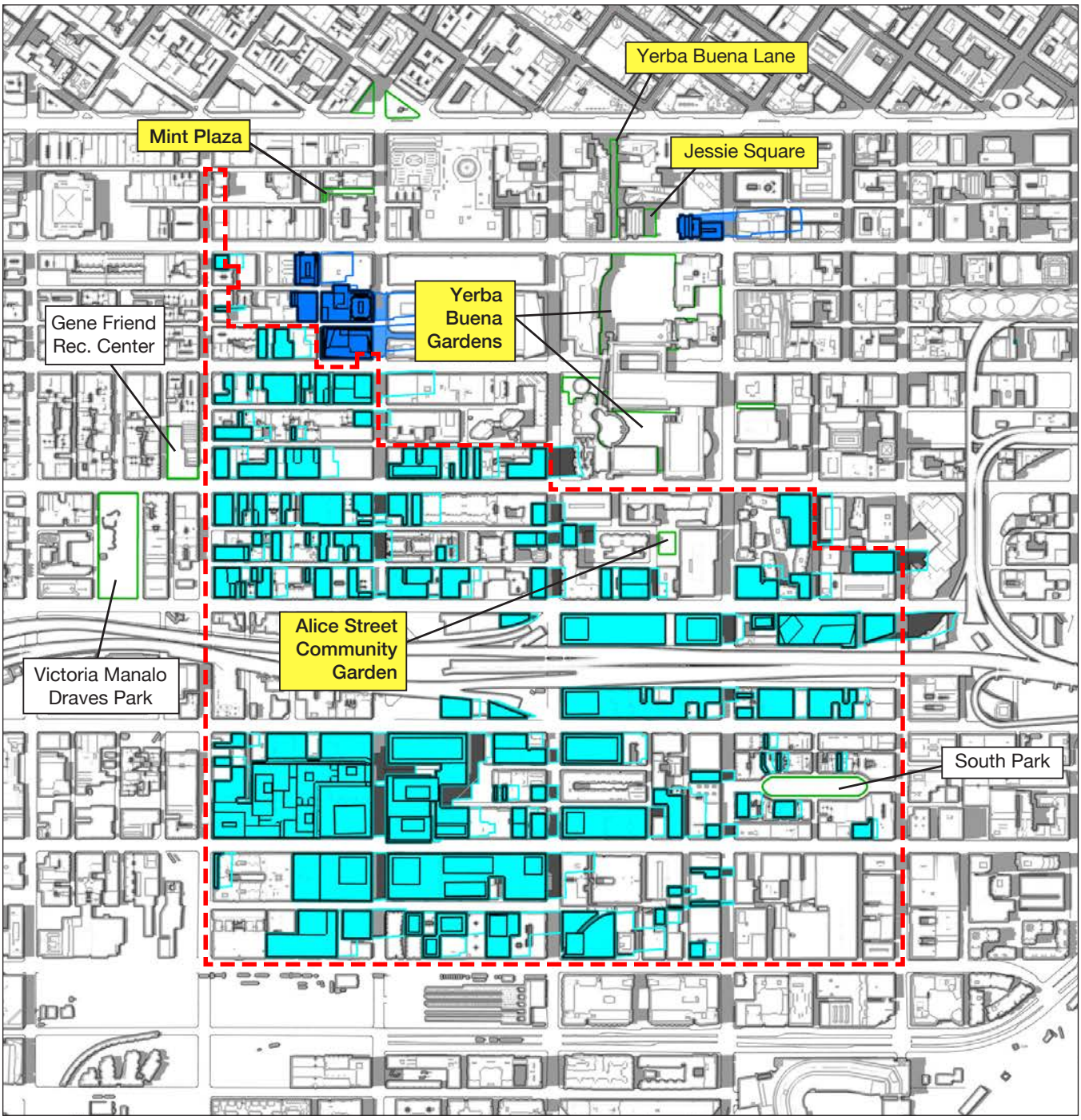


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-6

Shadows: September 20 (Fall Equinox) 12:00 noon [Revised]

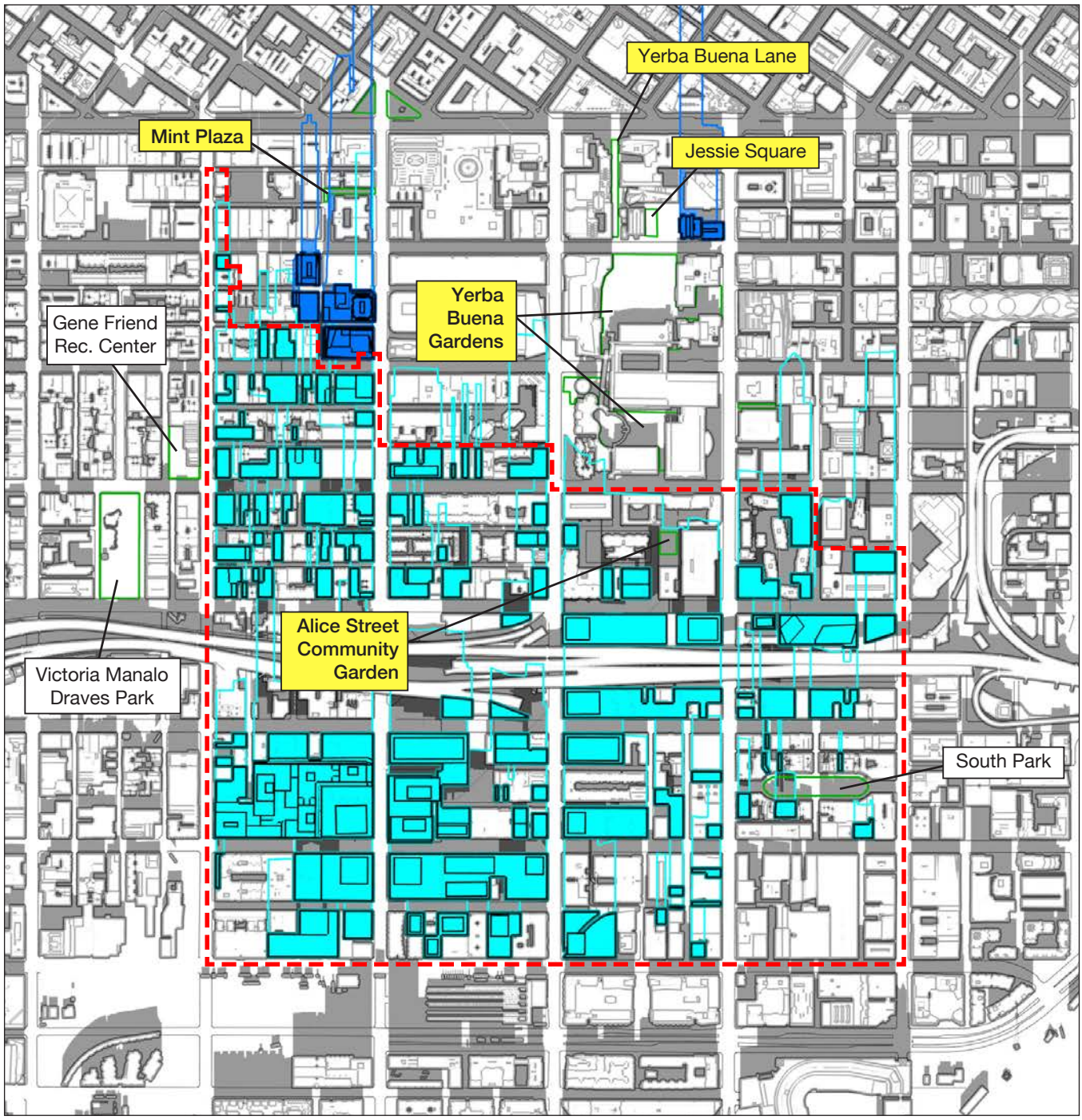


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-7

Shadows: September 20 (Fall Equinox) 3:00 p.m. [Revised]

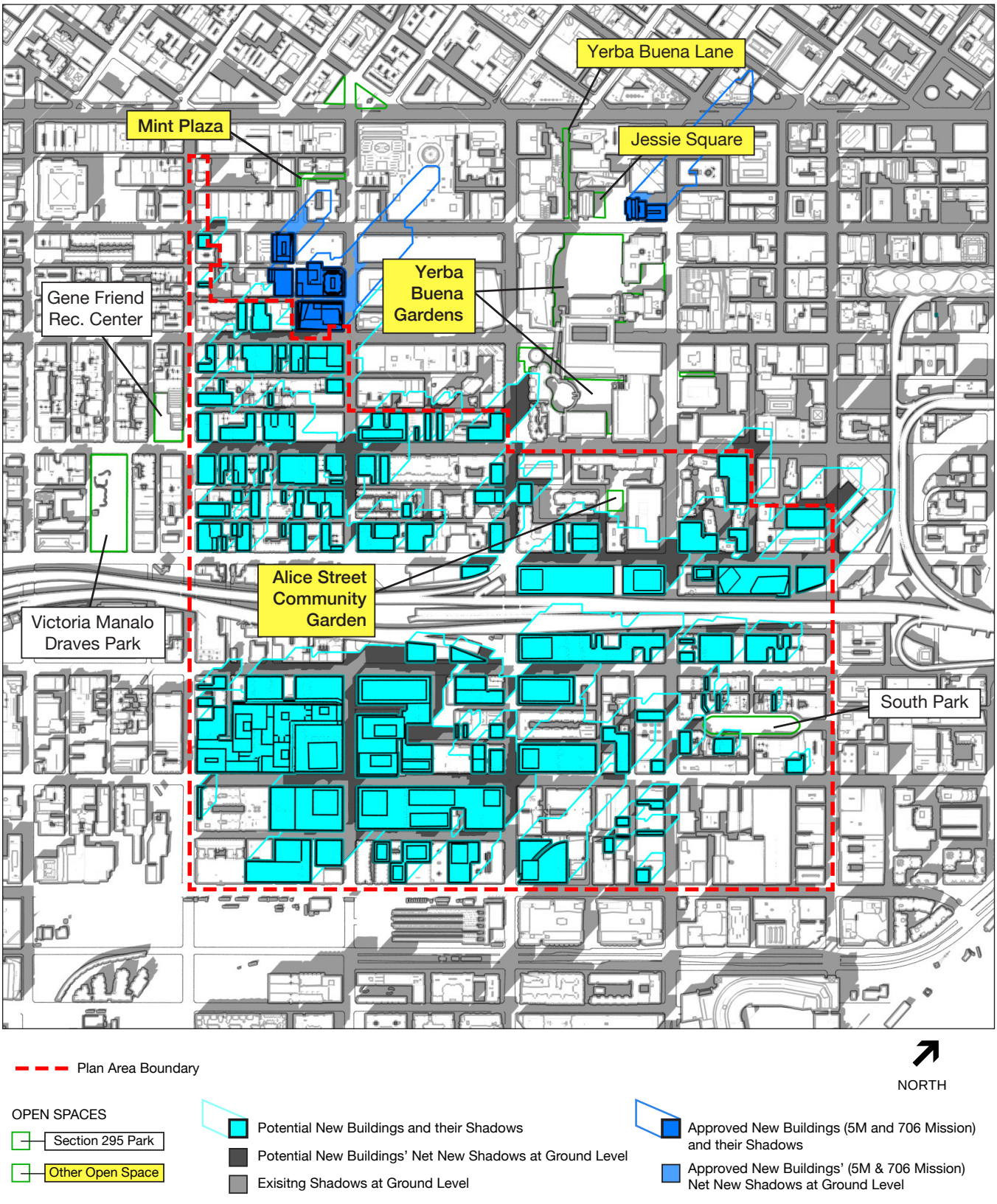


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-8

Shadows: December 20 (Winter Solstice) 9:00 a.m. [Revised]

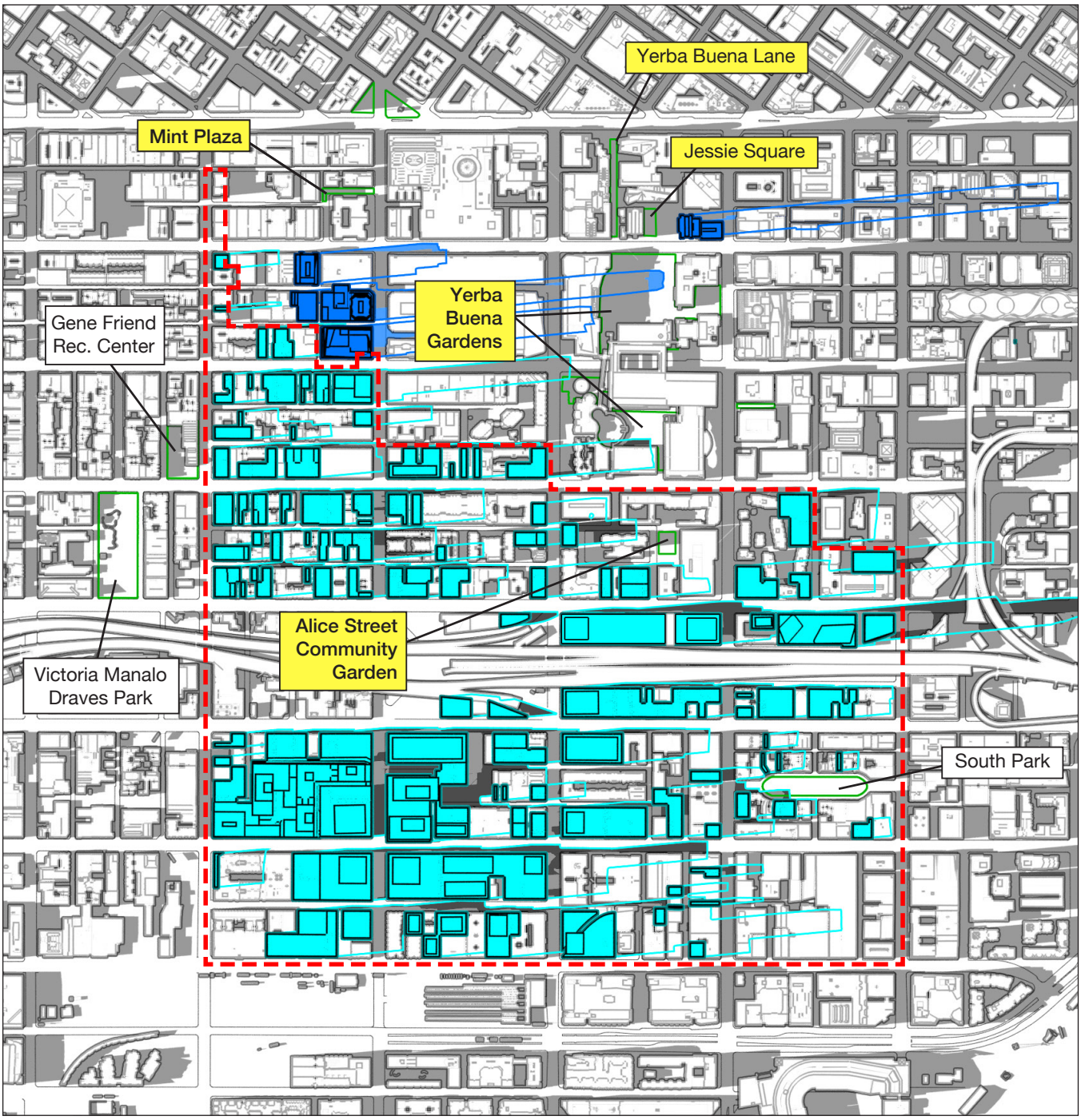


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-9

Shadows: December 20 (Winter Solstice) 12:00 noon [Revised]

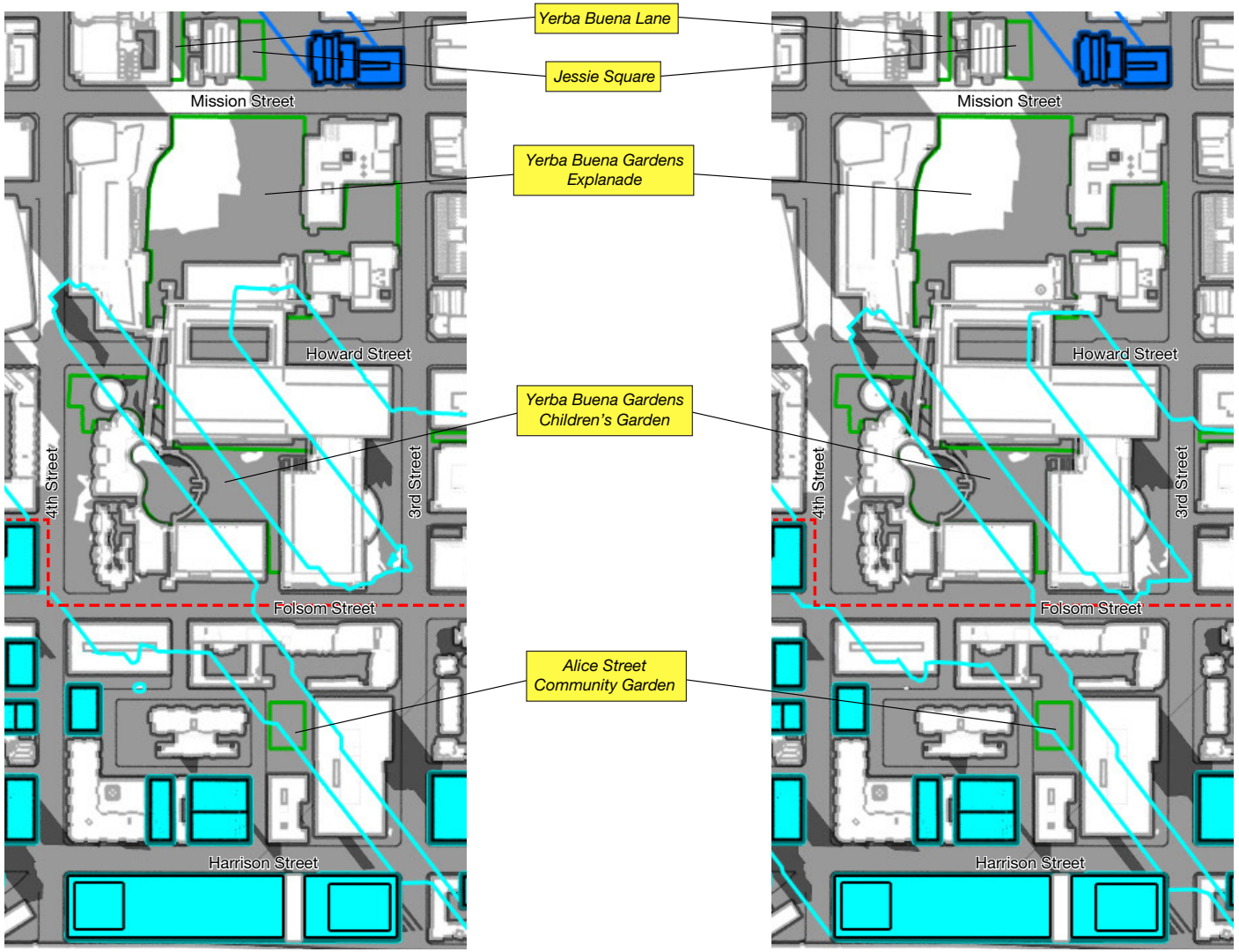


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-10

Shadows: December 20 (Winter Solstice) 3:00 p.m. [Revised]

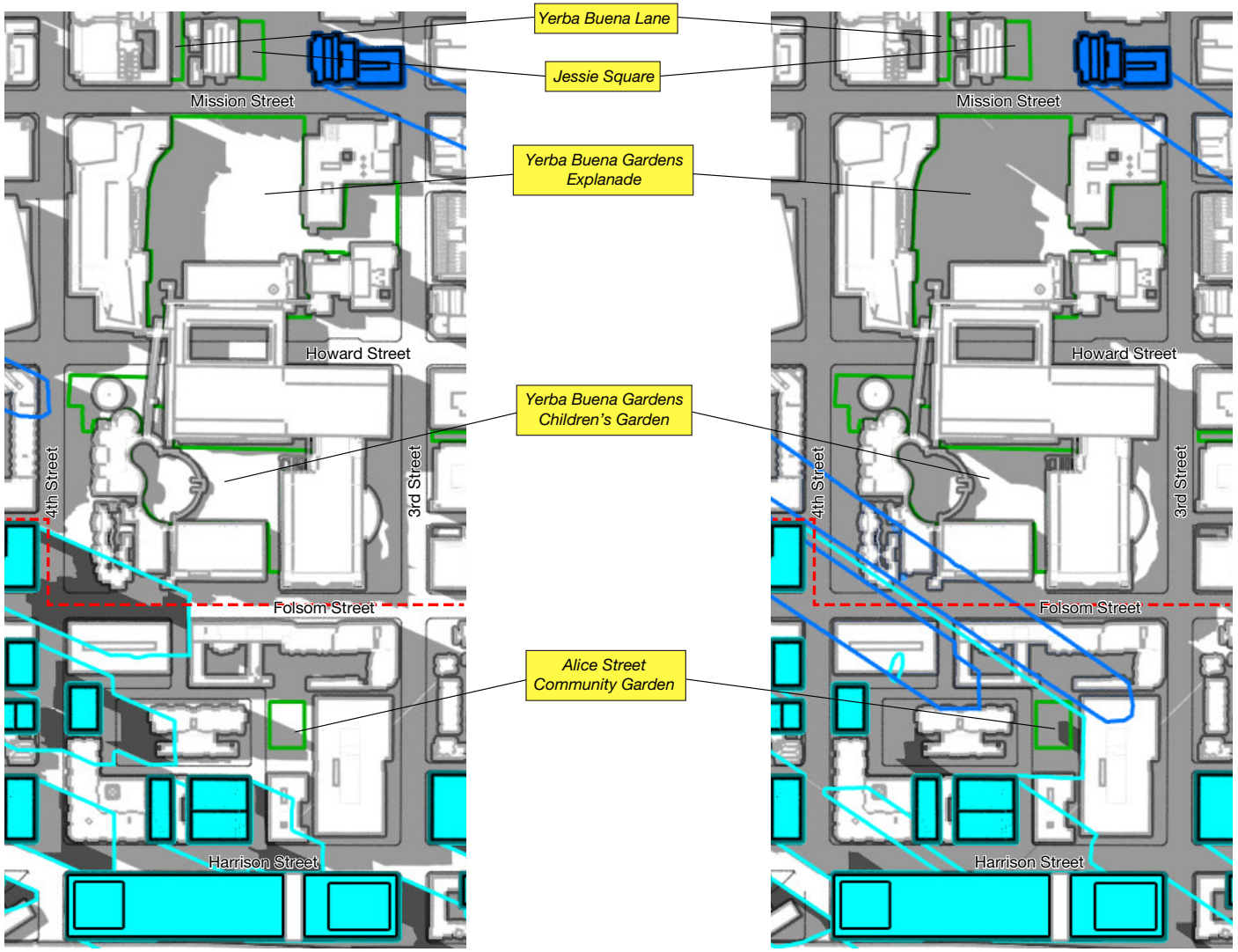


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-17

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, September 20 (Fall Equinox) [Revised]

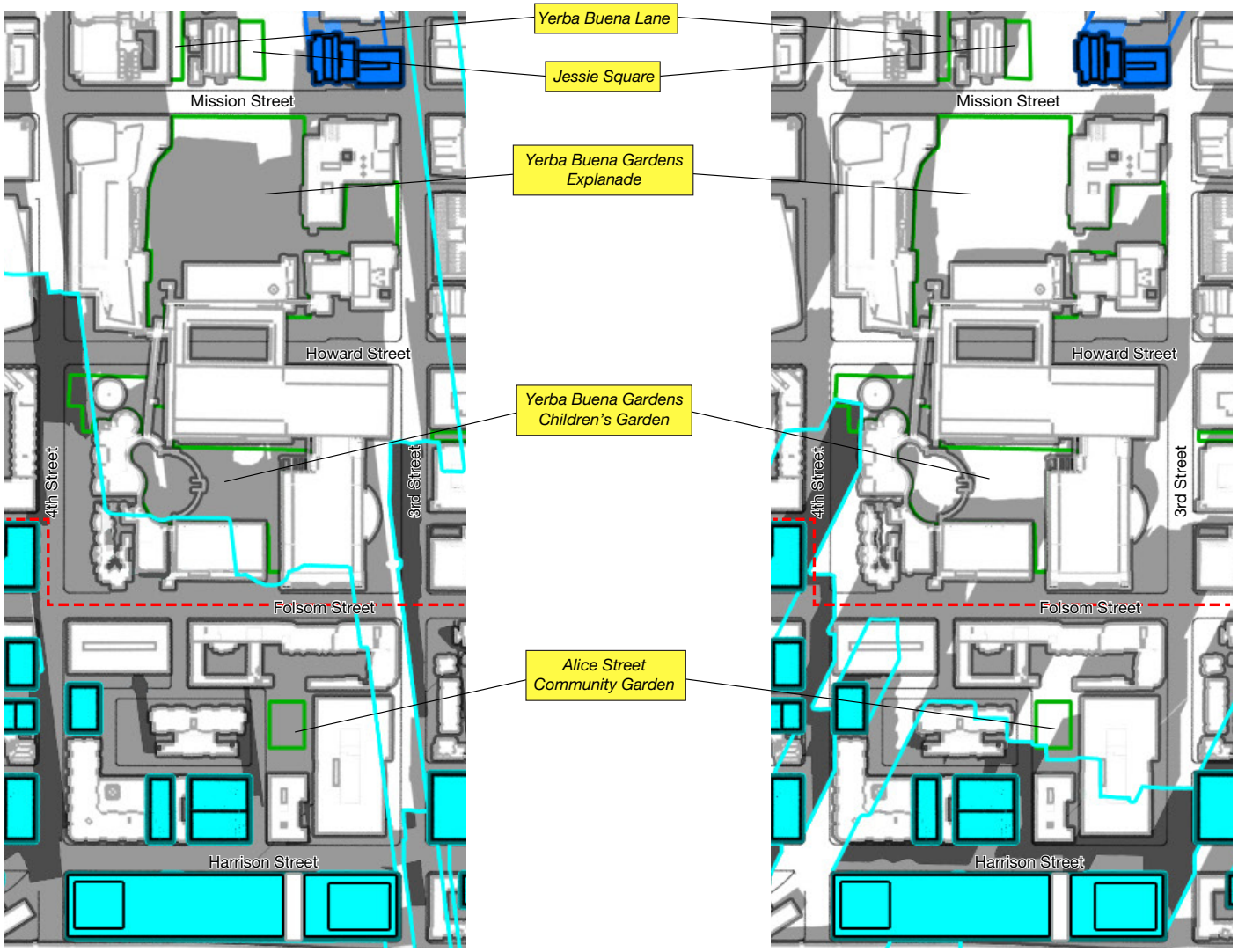


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-18

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, September 20 (Fall Equinox) (continued) [Revised]

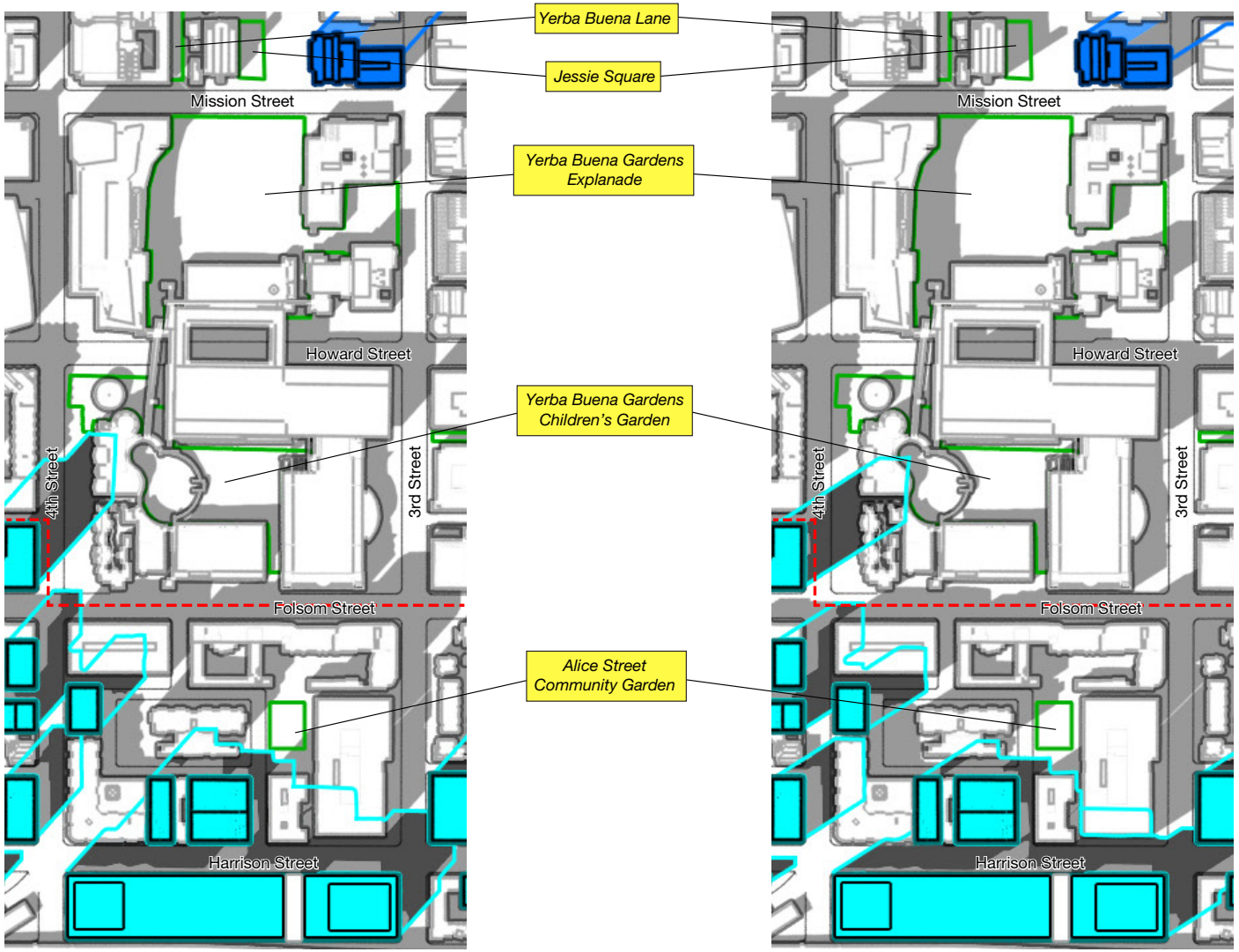


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-19

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) [Revised]

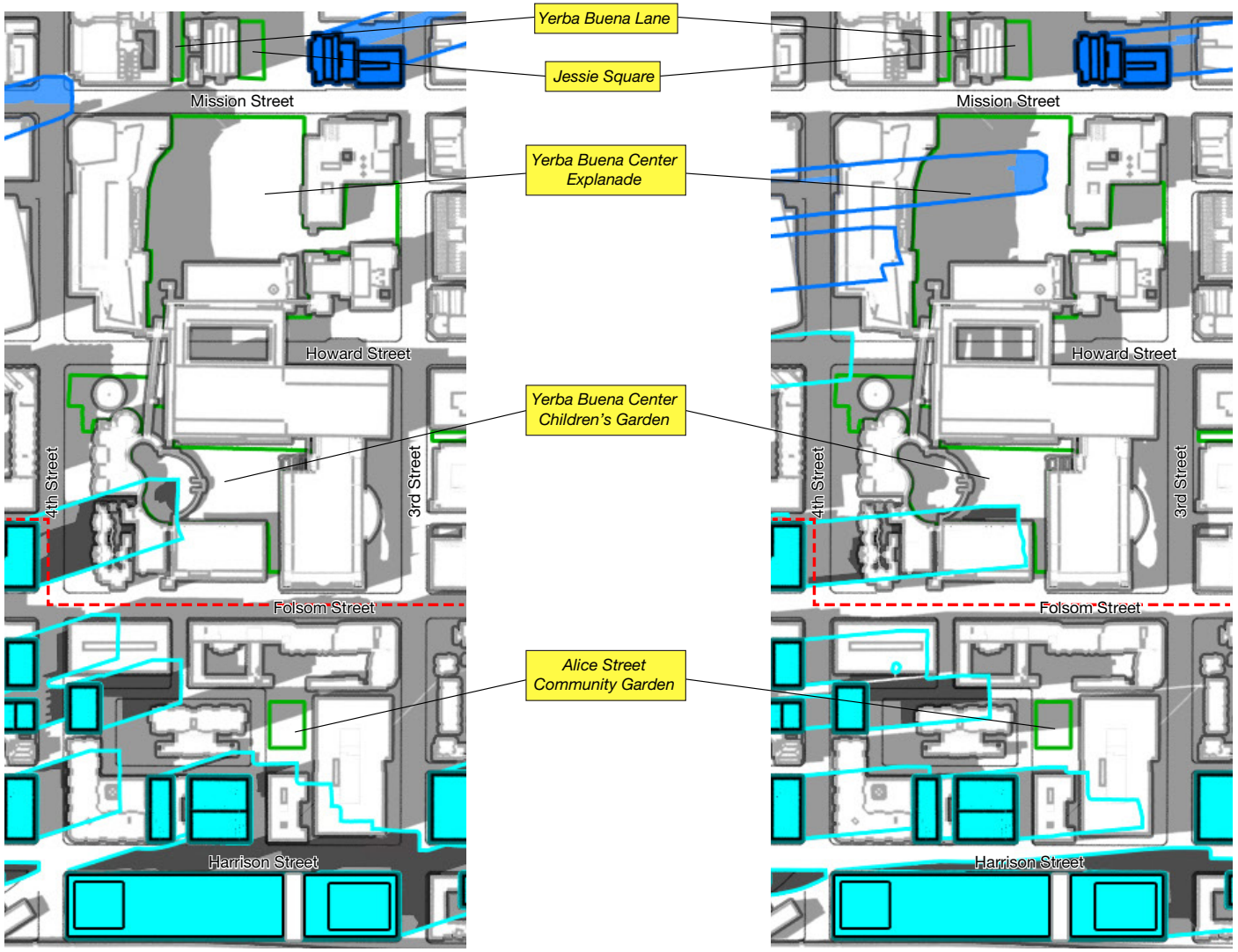


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-20

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]

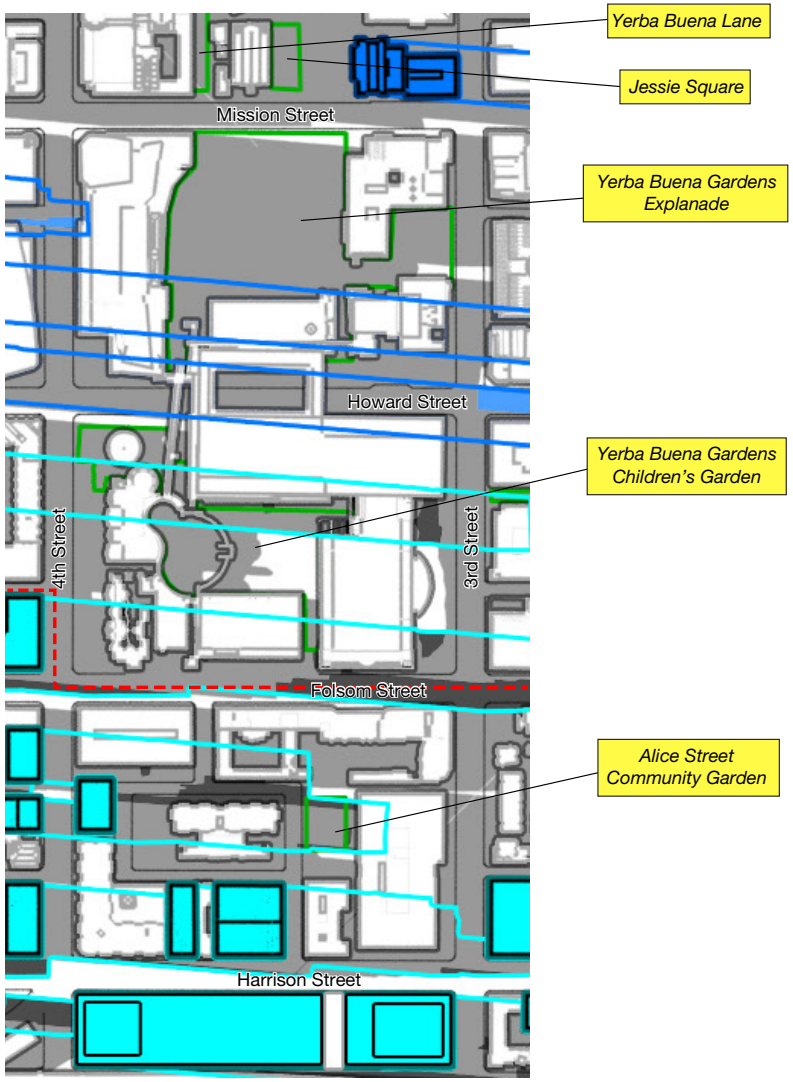


SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

Figure IV.H-21

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]



SOURCE: CADP

Figure IV.H-22

Shadow from Plan Area Buildings on Yerba Buena Gardens, Alice Street Community Garden, Jessie Square, Yerba Buena Lane, December 20 (Winter Solstice) (continued) [Revised]

E.14 Chapter V, Other CEQA Considerations

* On p. V-2, the following revision is made to Impact TR-6:

> **Impact TR-6: Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial and passenger loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or pedestrians.**

* On p. V-10, the following revision is made to the second paragraph under the heading "Housing" to remove an incorrect statement:

> The City Office of the Controller – Office of Economic Analysis determined that new market-rate housing in San Francisco has the effect of lowering, rather than raising, housing values at the local and citywide level.[413,414] Research also indicates that at the regional scale, producing more market-rate housing will result in decreased housing prices, and reduce displacement pressures (although not as effectively as subsidized housing). However, at the local level, market rate housing would not necessarily have the same effects as at the regional scale, due to a mismatch between demand and supply.[415] ~~The influx of real estate investment and higher income, residents may increase gentrification of a neighborhood, with displacement of households being a negative outcome.~~ The Central SoMa Plan could, however, help ameliorate pressure on housing prices ~~alleviate this effect~~ through policy goals aimed at ensuring that 33 percent of new housing in the Plan Area is affordable to very low, low, and moderate-income households.
>
> **Footnotes:**
> [413] City and County of San Francisco, ~~City~~ Office of the Controller – Office of Economic Analysis, *Potential Effects of Limiting Market-Rate Housing in the Mission*, September 10, 2015.
> [414] The analysis further determined that locally imposing limits on market-rate housing in the city would, in general, place greater upward pressure on city housing prices, and reduce affordable housing resources to a greater extent than if no limit on market-rate housing were imposed.
> [415] Berkeley Institute of Governmental Studies (IGS), *Housing Production, Filtering and Displacement: Untangling the Relationships*, May 2016.

E.15 Chapter VI, Alternatives

* On Draft EIR p. VI-2, footnote 420 has been removed as the development assumptions for the alternatives identified in Table VI-1 do take into account the potential for application of the density bonus for affordable housing projects enabled by AB 2501:

> ~~[420] Development assumptions for the alternatives do not take into account the potential for application of the density bonus for affordable housing projects enabled by AB 2501.~~

On Draft EIR p. VI-10, footnote 422 has been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

> [422] ~~As noted in Chapter II, Project Description, the City is anticipated to~~ The Board of Supervisors, on February 7, 2017, adopted an ordinance ~~by end of 2016~~ that ~~would~~ mandates TDM Programs in many new development projects.

On Draft EIR p. VI-33, the second sentence of the last partial paragraph has been revised as follows to clarify the distance noted:

> … The Central Subway will extend from Chinatown through the Union Square area, the Plan Area, and Mission Bay, and will pass within two blocks (less than 500 feet) of the Pier 70 development site before continuing south through the Bayview and into Visitacion Valley. …

On Draft EIR p. VI-34, the third sentence of the last paragraph has been revised as follows to clarify the distance noted:

> … The primary difference would be that the Modified TODCO Plan would extend the Western SoMa Plan's Folsom Street Neighborhood Commercial Transit (F-NCT) district two blocks (about 1,750 feet) east to Fourth Street, rather than zoning parcels along Folsom Street as Mixed-Use, General (MUG) or Mixed-Use, Office (MUO). …

On Draft EIR p. VI-55, footnote 432 has been revised as follows to account for the City's adoption of a TDM program since publication of the Draft EIR:

> [432] ~~As noted in Chapter II, Project Description, the City is anticipated~~ The Board of Supervisors, on February 7, 2017, adopted an ordinance ~~by end of 2016~~ that ~~would~~ mandates TDM Programs in many new development projects.

E.16 Appendix C, Historical Architectural Resources in the Plan Area and Vicinity

* Appendix C, Historical Architectural Resources in the Plan Area and Vicinity, has been revised to correct inaccuracies and include potentially eligible historical resources and districts, consistent with revised Figure IV.C-2:

E.17 Appendix E, Shadow

* Appendix E, Shadow Modeling Results, is replaced to account for the change in the Height and Bulk Districts proposed for the block bounded by Harrison, Third, Bryant, and Fourth streets. The revised appendix is included in PDF format on a CD inside the back cover of this RTC document.

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ATTACHMENTS

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

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ATTACHMENTS DRAFT EIR COMMENTS INTRODUCTION

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

In this RTC document, each commenter is assigned a unique commenter code in the following manner:

- Commenters from agencies are designated by "A-" and the agency's name or acronym thereof. In each case where multiple commenters from the same agency provided separate comments, the acronym is followed by each commenter's last name.
- Commenters from organizations are designated by "O-" and the organization's name or acronym thereof. In each case where multiple commenters from the same organization provided separate comments, the acronym is followed by each commenter's last name.
- Commenters as individuals are designated by "I-" and the commenter's last name.

Subsequently, each comment is assigned a number (".#"), which is preceded by the commenter code. For example, the second comment received from a representative of an organization known as "Friends of Friends" would be given designated "O-FOF.2," while the third comment received from an individual named Smith would be designated "I-Smith.3." In cases where a commenter has provided both written and oral comments, each set of comments is assigned a "-1" or "-2" to distinguish between written and oral comments, respectively; for example, the third comment from individual Hestor's written comments would be designated "I-Hestor-1.3," while the fifth comment from her oral comments would be designated "I-Hestor-2.5." In this way, the reader can locate a particular comment in a comment letter or the public hearing testimony by referring to the comment's designation.

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

Project Description [PD]
Plans and Policies [PP]
Overview [OV]
Land Use and Land Use Planning [LU]
Aesthetics [AE]
Cultural and Paleontological Resources [CP]
Transportation and Circulation [TR]
Noise and Vibration [NO]
Air Quality [AQ]
Wind [WI]
Shadow [SH]
Hydrology (Sea Level Rise and Combined Sewer System) [HY]
Other CEQA Considerations [OC]
Alternatives [AL]
Cumulative Impacts [CU]

Initial Study Topics
Population and Housing [PH]
Recreation [RE]
Public Services [PS]
Biological Resources [BI]
Geology and Soils [GE]

Plan Merits [PM]
General Comments (GC)

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

ATTACHMENT A DRAFT EIR COMMENT LETTERS

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-BART	Val Joseph Menotti, Chief Planning & Development Officer	Letter	1	PM-2: Support for the Plan
A-SFMTA	Charles Rivasplata, Transportation Planner	Letter	1	PD-11: Street Network Changes
			2	TR-13: Mitigation and Improvement Measures
			3	TR-13: Mitigation and Improvement Measures
			4	TR-1: Transportation Setting
			5	TR-13: Mitigation and Improvement Measures
			6	TR-9: Pedestrian and Bicycle Impacts
Organizations				
O-B505	John Kevlin, Attorney	Letter	1	PD-12: Tower Separation Policy
O-CSN-1	Richard Drury, Attorney, Central SoMa Neighbors, S.F. Blu	Letter	1	AL-3: Support for Alternatives Identified in the Draft EIR
			2	LU-3: Plan Would Disrupt/Divide Neighborhood
			3	AL-3: Support for Alternatives Identified in the Draft EIR
			4	AL-1: Analyze Additional Alternatives in the Draft EIR
			5	PD-8: Request for Park on Second Street
			6	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			7	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study is Inadequate
			8	GC-2: CEQA Baseline
			9	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study is Inadequate

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			10	GC-2: CEQA Baseline
			11	GC-3: CEQA Process
			12	PP-4: General Plan Consistency
			13	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			14	TR-3: Vehicle Miles Traveled (VMT) Impacts
			15	TR-6: Transportation Impact Figures
			16	GC-2: CEQA Baseline
			17	TR-12: Emergency Vehicle Access Impacts
			18	TR-11: Parking Impacts
			19	CU-3: Cumulative Transportation and Air Quality Analysis
			20	AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
			21	GC-2: CEQA Baseline
			22	AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
			23	AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
			24	AQ-2: Air Quality Mitigation Measures
			25	AQ-2: Air Quality Mitigation Measures
			26	AE-2: Conclusion Regarding Aesthetics Impacts
			27	OC-3: Growth-Inducement Analysis
			28	PH-3: Population Analysis and Conclusion on Housing
			29	RE-1: Adequacy of Open Space and Privately Owned Public Open Space (POPOS)
			30	SH-2: Conclusion Regarding Shadow Impacts
			31	TR-9: Pedestrian and Bicycle Impacts
			32	OC-1: Gentrification and Displacement
			33	PS-2: Public Services Analysis Is Inadequate
			34	TR-13: Mitigation and Improvement Measures

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			35	BI-1: Biological Resources Impact Analysis
			36	CU-3: Cumulative Transportation and Air Quality Analysis
			37	AL-2: Environmentally Superior Alternative Analysis
			38	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			39	AL-3: Support for Alternatives Identified in the Draft EIR
			40	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			41	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study is Inadequate
			42	PM-4: Plan Will Adversely Affect Central SoMa Neighborhood
			43	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study is Inadequate
			44	GC-2: CEQA Baseline
			45	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			46	OC-3: Growth-Inducement Analysis
			47	PH-3: Population Analysis and Conclusion on Housing
			48	OC-1: Gentrification and Displacement
			49	PS-2: Public Services Analysis Is Inadequate
			50	SH-2: Conclusion Regarding Shadow Impacts
			51	RE-2: Adequacy of Recreational Facilities
			52	PP-4: General Plan Consistency
			53	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			54	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			55	AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
			56	GC-2: CEQA Baseline
			57	CU-3: Cumulative Transportation and Air Quality Analysis

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			58	AL-2: Environmentally Superior Alternative Analysis
			59	TR-3: Vehicle Miles Traveled (VMT) Impacts
			60	TR-5: Traffic Level of Service Analysis
			61	GC-2: CEQA Baseline
			62	TR-8: Transit Impacts
			63	CU-3: Cumulative Transportation and Air Quality Analysis
			64	TR-9: Pedestrian and Bicycle Impacts
			65	TR-12: Emergency Vehicle Access Impacts
			66	TR-2: Methodology
			67	BI-1: Biological Resources Impact Analysis
O-CSPO	Melinda A. Sarjapur, Attorney	Letter	1	CP-3: Mitigation Measures
			2	CP-3: Mitigation Measures
			3	CP-3: Mitigation Measures
			4	TR-13: Mitigation and Improvement Measures
			5	TR-13: Mitigation and Improvement Measures
			6	NO-3: Mitigation Measures
			7	NO-3: Mitigation Measures
			8	NO-3: Mitigation Measures
			9	PD-2: Address Potential Maximum Building Heights and Potential Modified Massing Requirements
			10	PD-2: Address Potential Maximum Building Heights and Potential Modified Massing Requirements
			11	OV-1: Description of Subsequent Development Projects
			12	LU-1: Revise Plan Area Boundary Description
			13	LU-2: Update Regarding Adoption of Transportation Demand Management (TDM) Program

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			14	AE-1: Address Maximum Building Heights
			15	AE-1: Address Maximum Building Heights
			16	WI-2: Wind Setting
			17	WI-2: Wind Setting
			18	WI-3: Wind Methodology
			19	WI-6: Address Maximum Building Heights
			20	WI-5: Wind Analysis
			21	WI-5: Wind Analysis
			22	WI-5: Wind Analysis
O-FADF	Bernadette Sy, Executive Director, Filipino-American Development Foundation	Letter	1	OC-1: Gentrification and Displacement
			2	CP-5: SoMa Pilipinas Cultural Heritage District
O-Freeman	Bill Kuehnle, Vice President and General Manager of Freeman Expositions Inc.	Letter	1	TR-10: Loading Impacts
O-MPHA	Jim Bourgart, Board President, Museum Parc Homeowners Association	Letter	1	TR-6: Transportation Impact Figures
			2	TR-10: Loading Impacts
O-One Vassar	Melinda A. Sarjapur, Attorney	Letter	1	PD-9: Revise Maximum Height Proposed for Parcels North of I-80 Freeway and East of Fourth Street
			2	PP-7: One Vassar Project
			3	OV-1: Description of Subsequent Development Projects
			4	AE-3: One Vassar Project
			5	CP-4: Object to Identification of 645 Harrison Street as a Potential Article 10 Landmark
			6	CP-1: Historic Resources That Could Be Affected by the Plan

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			7	TR-14: Miscellaneous Transportation Comments
			8	GC-6: Individual Project Analysis
			9	GC-6: Individual Project Analysis
			10	CU-4: Transbay Joint Powers Authority Bus Facility
O-SDA	Tony Robles, Housing Organizing Director, Senior & Disability Action	Letter	1	GC-11: Plan Impacts on Seniors
O-SFBC	Janice Li, Advocacy Director, San Francisco Bicycle Coalition	Letter	1	TR-9: Pedestrian and Bicycle Impacts
			2	PM-2: Support for the Plan
O-SFRG-1	John Elberling, Member, San Franciscans for Reasonable Growth	Letter	1	PD-4: Folsom/Howard Streetscape Project Analysis Is Not Clear
O-SOMCAN-Cabande	Angelica Cabande, Organizational Director, South of Market Community Action Network	Letter	1	GC-3: CEQA Process
			2	GC-3: CEQA Process
			3	PM-1: Do Not Support the Plan
			4	PM-5: Youth and Family Zone Special Use District
			5	TR-8: Transit Impacts
			6	TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles
			7	PD-10: State Density Bonus Program
			8	OC-1: Gentrification and Displacement
			9	GC-13: Non-Traditional Housing/Short-Term Rentals
			10	CU-2: Address 5M Project in Cumulative Analysis
			11	PP-6: Office Uses in Central SoMa
			12	PD-5: Impact of Plan on Production, Distribution, and Repair (PDR) Uses

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			13	OC-1: Gentrification and Displacement
			14	RE-1: Adequacy of Open Space and Privately Owned Public Open Space (POPOS)
			15	OC-1: Gentrification and Displacement
			16	WI-8: Impacts of the Plan Wind Conditions on Seniors and the Disabled
			17	NO-1: Construction Noise Impacts
			18	AQ-1: Adequacy of Air Quality Impact Analysis and Conclusion
			19	TR-9: Pedestrian and Bicycle Impacts
			20	GC-3: CEQA Process
			21	GC-5: Adequacy of Draft EIR Analysis and Mitigation
			22	AL-1: Analyze Additional Alternatives in the Draft EIR
			23	GC-3: CEQA Process
			24	AL-1: Analyze Additional Alternatives in the Draft EIR
			25	GC-5: Adequacy of Draft EIR Analysis and Mitigation
O-SPG	Steven L. Vettel, Attorney	Letter	1	PD-1: 636–648 Fourth Street Project
O-Tishman	Melinda A. Sarjapur, Attorney	Letter	1	PD-2: Address Potential Maximum Building Heights and Potential Modified Massing Requirements
			2	SH-1: Potential Shadow on a Possible Park Site
			3	PP-1: 598 Brannan Street Project Description
			4	OV-1: Description of Subsequent Development Projects
			5	GC-6: Individual Project Analysis
O-VEC	Chris Durazo, Coordinator, Bill Sorro Housing Program Coordinator	Letter	1	RE-1: Adequacy of Open Space and Privately Owned Public Open Space (POPOS)
			2	SH-3: Extend Proposition K to Privately Owned Public Open Space (POPOS)
			3	PM-5: Youth and Family Zone Special Use District
			4	CP-5: SoMa Pilipinas Cultural Heritage District

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			5	CP-2: Intangible Cultural Heritage Assets
			6	TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles
			7	OC-1: Gentrification and Displacement
			8	LU-4: Address Impacts on Neighborhood Character
			9	PP-6: Office Uses in Central SoMa
			10	PD-10: State Density Bonus Program
			11	PH-2: The Draft EIR Should Map Housing for Seniors
			12	OC-1: Gentrification and Displacement
			13	OC-4: Homelessness
			14	HY-1: Plan Effects on the Combined Sewer System During Wet Weather
			15	HY-2: Sea Level Rise between Fifth and Sixth Streets Should Be Studied
			16	NO-2: Traffic Noise Impacts
			17	NO-1: Construction Noise Impacts
			18	NO-2: Traffic Noise Impacts
			19	AQ-2: Air Quality Mitigation Measures
O-YBCBD	Scott Rowitz, Vice Chair, Yerba Buena Community Benefit District	Letter	1	TR-9: Pedestrian and Bicycle Impacts
			2	TR-9: Pedestrian and Bicycle Impacts
			3	TR-10: Loading Impacts
			4	TR-9: Pedestrian and Bicycle Impacts
			5	TR-8: Transit Impacts
			6	TR-10: Loading Impacts
			7	TR-10: Loading Impacts

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
O-YBNC-Light-1	Alice Light, TODCO, Director of Community Planning, The Yerba Buena Neighborhood Consortium	Letter	1	PD-4: Folsom/Howard Streetscape Project Analysis Is Not Clear
			2	TR-6: Transportation Impact Figures
			3	PD-4: Folsom/Howard Streetscape Project Analysis Is Not Clear
O-YBNC-Elberling	John Elberling, Chair, The Yerba Buena Neighborhood Consortium	Letter	1	PS-2: Public Services Analysis Is Inadequate
			2	PS-1: Childcare
			3	RE-2: Adequacy of Recreational Facilities
			4	PM-1: Do Not Support the Plan
Individuals				
I-Brennan	Nicole Brennan	E-Comment	1	AL-1: Analyze Additional Alternatives in the Draft EIR
			2	PD-7: Pedestrian and Bicycle Improvements
I-Camp	Daniel Camp	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Cerles	Marty Cerles Jr.	E-Comment	1	PM-6: Restrictions on Building Market-Rate Housing
I-Domalewski	Armand Domalewski	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Ferro, A.	Angelo Ferro	Letter	1	PD-3: Building Heights On and Near Flower Mart Site
			2	PP-9: Western SoMa Mixed Use Office (WMUO) Zoning District
			3	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Goldstein	Joshua Goldstein	E-Comment	1	GC-9: Name a Privately Owned Public Open Space (POPOS) After Kerouac
I-Hestor-1	Sue C. Hestor, Attorney	Letter	1	CU-3: Cumulative Transportation and Air Quality Analysis
			2	GC-4: Cut-and-Cover Construction
			3	GE-1: Construction on Bay Fill
			4	TR-9: Pedestrian and Bicycle Impacts
			5	NO-1: Construction Noise Impacts
			6	PP-5: History of Prior Planning Efforts

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
			7	PP-8: Provide Page Reference When Other Area Plans Referenced
			8	GC-12: Timing of the Central SoMa Plan
			9	PP-2: Plan Bay Area Housing Goals
			10	GC-1: Success of Other Area Plans in Achieving Stated Goals
			11	LU-5: Add a Mitigation Measure to Require Notice of Special Restriction (NSR) for Market-Rate/Office Development to Protect Production, Distribution, and Repair (PDR) and Entertainment Uses
			12	CU-1: Add Projects with Preliminary Project Applications (PPAs) to Cumulative List
			13	WI-1: Dates for Wind Speed Data at 50 United Nations Plaza Building
			14	WI-4: Westerly Winds Strongly Affect the South of Market Neighborhood
			15	WI-7: Analyze Wind Impacts on Bicyclists
			16	WI-9: Analyze Wind Impacts on Elevated I-80 Freeway Structure
			17	WI-11: Cumulative Wind Analysis
			18	WI-12: Establish a Wind Impact Fee to Support a Consistently Updated Wind Study
			19	WI-10: Wind Analysis of Subsequent Projects in Plan Area
			20	GE-1: Construction on Bay Fill
			21	GC-8: Lower-Rise Construction Could Lower Cost of Development and Thereby Provide Lower-Income Housing
I-Hong	Dennis Hong	Email	1	PM-2: Support for the Plan
I-Nagy	Tamas Nagy	E-Comment	1	PD-7: Pedestrian and Bicycle Improvements
I-Patterson	Richard North Patterson	E-Comment	1	AL-3: Support for Alternatives Identified in the Draft EIR
I-Rosenberg	Isaac Rosenberg	E-Comment	1	AL-1: Analyze Additional Alternatives in the Draft EIR
			2	PD-13: Proposed Changes to 330 Townsend and 636–648 Fourth Streets
			3	PD-7: Pedestrian and Bicycle Improvements
			4	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Schuttish	Georgia Schuttish	Email	1	PH-1: Residential Location of Plan Area Employees and Occupancy Rates

TABLE A-1 COMMENT LETTERS AND EMAILS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
I-Schwark-1	Jon Schwark	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Su	Justin Su	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Weel	Jaap Weel	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Whitaker	James Whitaker	Email	1	AL-1: Analyze Additional Alternatives in the Draft EIR
			2	NO-1: Construction Noise Impacts
			3	GE-1: Construction on Bay Fill
			4	AL-1: Analyze Additional Alternatives in the Draft EIR
I-Zhang	Jingzhou Zhang	E-Comment	1	PM-2: Support for the Plan

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A-BART

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688
(510) 464-6000

2017

Rebecca Saltzman
PRESIDENT

Robert Raburn
VICE PRESIDENT

Grace Crunican
GENERAL MANAGER

DIRECTORS

Debora Allen
1ST DISTRICT

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2ND DISTRICT

Rebecca Saltzman
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Robert Raburn, Ph.D.
4TH DISTRICT

John McPartland
5TH DISTRICT

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

Lateefah Simon
7TH DISTRICT

Nicholas Josefowitz
8TH DISTRICT

Bevan Dufty
9TH DISTRICT

February 14, 2017

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

Re: Central SoMa Plan Case No. 2011.1356E
Comments on Draft Environmental Impact Report
State Clearinghouse No. 2013042070

Dear Ms. Gibson:

On behalf of the San Francisco Bay Area Rapid Transit District (BART), we wanted to provide comments on the Draft Environmental Impact Report (DEIR) for the Central SoMa Plan. BART has been an active participant in the planning process and appreciates this opportunity to continue to provide feedback.

A-BART.1

PM-2

In June 2016, the BART Board of Directors adopted our updated Transit-Oriented Development (TOD) Policy, which promotes high quality, more intensive development at, or near, BART stations. Given the planned land use growth and transportation improvements in the Central SoMa Plan Area, BART supports this vision for growth and investment, which aligns with our TOD Policy.

The Central SoMa Plan would enable the development of up to 50,000 jobs and 7,500 housing units and result in significant funding for public benefits for more affordable housing, and transit and complete streets investments.

The DEIR anticipates that this growth will stretch BART's ability to comfortably accommodate more customers on our trains and at Powell St. Station. The City recognizes the key role BART plays in serving local and regional residents and workers, and has been working with BART to develop a funding strategy to support future upgrades and capacity projects in the Station Modernization Plans for Powell, Montgomery and Civic Center Stations. These projects include a new elevator, new fare gates, lighting upgrades at Powell, as well as traction power facilities at Civic Center and Montgomery Stations to support our Core Capacity Program serving Market Street. The funding strategy also includes planning and design for long term transit capacity improvements.

In June 2016, BART also adopted our updated Station Access Policy, which seeks to enable riders to get to and from stations safely, comfortably, affordably, and cost-effectively. In particular, the policy seeks to expand the share of riders walking, biking, and taking transit to the BART stations in order to more sustainably accommodate the growing demand for access to the BART system. Sustainable and seamless access is also reflected in the BART Strategic Plan Framework vision statement: "BART supports a sustainable and prosperous Bay Area by connecting communities with seamless mobility." These policy goals are supported by many elements of the proposed plan, and BART looks forward to working with the City in implementing projects that support these goals.

A-BART.1 (cont'd.)

PM-2

BART is very appreciative of the level of involvement and discussions with the City since the inception of the planning process and is looking forward to our ongoing collaboration with the City of San Francisco on this important project. Thank you for your review and consideration of our comments in this letter. If you have any questions, please contact me at 510.287.4794 or at VMenott@bart.gov.

Sincerely,

Val Joseph Menotti
Chief Planning & Development Officer
Planning, Development & Construction
San Francisco Bay Area Rapid Transit District

A-SFMTA

SFMTA
Municipal
Transportation
Agency

Edwin M. Lee, *Mayor*

Tom Nolan, *Chairman*
Cheryl Brinkman, *Vice-Chairman*
Gwyneth Borden, *Director*
Malcolm Heinicke, *Director*
Lee Hsu, *Director*
Joél Ramos, *Director*
Cristina Rubke, *Director*

Edward D. Reiskin, *Director of Transportation*

MEMORANDUM

DATE: **February 10, 2017**

FROM: **Charles Rivasplata, SFMTA**

TO: **Michael Jacinto,Planning Department**

RE: **Central SOMA: Comments on the Draft Environmental Impact Report (DEIR)**

Staff at the SFMTA have reviewed the Environmental Impact Report (EIR) for the Central SOMA project. Staff comments on the transportation-related items discussed in the EIR are included below.

SPECIFIC COMMENTS:

Page S-1, Fourth Paragraph. On the fourth line, there is a reference to "specific designs" under analysis, however each corridor is going through a development/design process. At this point only basic design concepts have bneen included for the environmental.

A-SFMTA.1
PD-11

Pages S-17- S-19, Table S-1 (Top of Page). It appears that there are minor typos. Mitigation Measures M-TR-3a through M-TR-3c (right-hand column of the table) should not be bulleted. Please check to see that the bullets line up with the appropriate measures.

A-SFMTA.2
TR-13

Page S-20, Improvement Measure I-TR-5b: Cycle Track Post-Implementation Surveys. It should be noted that it is not yet certain that cycletracks will be installed on all of the streets listed in the text.

A-SFMTA.3
TR-13

Page IV.D-12 (Figure IV.D-4). Check the locations of "closed crosswalks." The map shows a closed crosswalk across the south side of Fourth St. at Harrison, however a closed crosswalk is located across the on-ramp at Fourth/Harrison. In addition, there are no closed crosswalks at Fourth Street/Bryant.

A-SFMTA.4
TR-1

Page IV.D-54, Muni Storage and Maintenance.
Staff recommend that the first part of this paragraph be revised as follows:

A-SFMTA.5
TR-13

> "To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall **explore alternatives to** provide **improved** maintenance and storage facilities. In 2013, the SFMTA prepared a *Real Estate and Facilities Vision for the 21st Century* report. **In 2014, an *Addendum to the Real Estate and Facilities Vision for the 21st Century* report was prepared.**"

In addition, the SFMTA is preparing an update to the Vision Report in 2017.

Page IV.D-56, Last Paragraph.
The previous paragraph already lists "leading pedestrian intervals" as an improvement being implemented in the Central SoMa transportation study area. This paragraph should list it amongst the upcoming improvements to the proposed pedestrian network.

A-SFMTA.6
TR-9

O-B505

REUBEN, JUNIUS & ROSE, LLP

February 13, 2017

Via Hand Delivery

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

Re: Central SoMa Plan DEIR – Public Comment – 505 Brannan Street

Dear Ms. Gibson:

O-B505.1
PD-12

Our office represents B505 Industries, LLC with respect to their proposed project located at 505 Brannan Street. In December 2015, the Planning Commission approved an 85-foot-tall, office building at the site, consistent with the existing MOU zoning district. The project is under construction and now the project sponsor is pursuing entitlement of a "Phase II" addition to the project which would result in a 240 foot tall office tower, consistent with the zoning and height limitations for this site being analyzed in the Draft Environmental Impact Report ("DEIR") for the Central SoMa Plan as well as the 2013 draft of the Central SoMa Plan. The purpose of this letter to provide some brief comments on the DEIR.

We are pleased to see that the DEIR studied the full buildout of a 240 foot tall project at the site. Specifically, both the wind and shadow studies assumed a 240 foot tall project, with the understanding that each individual project would need to perform project-specific wind and shadow studies (among others) to confirm they do not cause a significant, unavoidable impact in order to justify the issuance of a Community Plan Exemption to cover environmental review.

Despite the lack of identified environmental issues to date (and the provision for further study in the future to confirm), Planning Department staff's most recent Central SoMa Plan draft calls for a 130 foot height limit at the site. The reasoning behind this is the proposed tower separation limitation in the Plan, which would limit new 160+ foot towers within 115 feet of other 160+ foot towers. Since a residential tower has been proposed at 620 Fourth Street adjacent to 505 Brannan Street, the proposed tower separation rule could put these two projects in conflict.

The Plan has several primary goals, including maximizing space for jobs in one of the last remaining areas of the City that can accept high-density office development – which is directly fulfilled by the Phase II project at 505 Brannan Street. The Plan includes many different policies, some of which conflict with each other. Ultimately, the City's primary planning body, the Planning Commission, should be the arbiter of these competing goals, and the Planning Commission can really only consider these factors once a project (or projects) are before them.

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O-B505.1 (cont'd.)

We do not think the tower separation rule is necessary to include in the Plan nor do we think it is appropriate to restrict the height limit at 505 Brannan Street to avoid a tower separation conflict. Based on the height limits proposed in the Plan, 505 Brannan Street and 620 Fourth Street is the only situation where this rule would potentially apply to two separate projects and project sponsors. Because of this, it is appropriate to allow for the Planning Commission to consider this issue when the actual proposed projects are before them, so they can understand what is actually being proposed and can make a decision on this unique situation. We should not take discretion away from the Planning Commission to weigh the competing policies, environmental concerns, and designs of the future projects and make a decision considering all of those factors. The Planning Commission should be given the opportunity to make the decision as to whether and how much these two towers must be separated once the actual projects are being considered by it.

If the height limit is reduced, there is no justification for reducing it below 160 feet, above which the tower separation rule would apply. As such, the height limit for the site should be no shorter than 160 feet.

Finally, eliminating the Planning Commission's discretion in favor of one project over another does not allow for flexibility in achieving the Plan's goals considering the uncertainty in the private development industry. Every project is subject to market forces as well as the unique circumstances of a project sponsor, and essentially choosing one project over another right now, before the projects are even prepared for approval, eliminates the ability of the Planning Commission to adjust based on evolving conditions.

We recognize that the tower separation issue is one that the Planning Commission will consider separate from the adequacy of the Plan's DEIR. We felt it important to make clear that the DEIR does allow for the Phase II project at 505 Brannan Street, and that the Commission has the ability to determine whether and how to apply the tower separation rule at Plan adoption. Thank you.

Very truly yours,

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O-CSN-1

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RE: Comments of Central SoMa Neighbors and SFBlu on Central SoMa Plan
DEIR SCH NO. 2013042070
SUPPORT FOR MID-RISE ALTERNATIVE (Reduced Height Alternative)

Dear President Hillis, Honorable Planning Commissioners, and Ms. Gibson:

I. INTRODUCTION

I am writing on behalf of the Central SoMa Neighbors (CSN) and SFBlu concerning the draft environmental impact report (DEIR) for the Central SoMa Plan. CSN and SFBlu (collectively, "Neighbors") urge the Planning Commission to adopt the Reduced Height Alternative, (known as the Mid-Rise Alternative in the Central Corridor Plan). The Mid-Rise Alternative would allow for a dramatic increase in residential and office development in the area, while still maintaining building heights of 130 feet or less (with some exceptions at transit hubs), thus retaining a pedestrian scale, livability, access to light, air and open space, and creating a family-friendly neighborhood. By contrast, the High-Rise alternative (identified simply as the "Plan" in the DEIR ("Plan" or "Project")), would create vastly higher building heights of up to 350 feet, which would be out-of-scale with a mixed-use residential neighborhood, casting shadows, blocking

O-CSN-1.1
AL-3

views, creating wind tunnels and essentially transforming the neighborhood into a second financial district. As longtime residents of Central SoMa, the Neighbors urge the Planning Commission to adopt the Mid-Rise Alternative since it protects neighborhood character, while allowing for almost as much job growth and housing as the High-Rise Alternative.

O-CSN-1.1 (cont'd.)

Central SoMa Neighbors (CSN) is a community organization composed of residents of the Central SoMa neighborhood. CSN is dedicated to preserving and enhancing the unique character of Central SoMa. CSN seeks to: 1. Help preserve and enhance the character of Central SoMa with its diversity of buildings and architecture; 2. Work towards making Central SoMa a more livable, mixed-use and pedestrian-friendly neighborhood; 3. Advocate for livability - residents need access to light, air, parks, and public open spaces; 4. Ensure the area is affordable and accessible, with the right balance of housing, office space and retail.

SFBlu is a homeowners association whose residents live at 631 Folsom Street. As longtime residents of Central SoMa, the Neighbors are committed to ensuring a safe, livable, family-friendly neighborhood. We are very much in favor of development and planning for sustainable growth that preserves the character of what this neighborhood is becoming --- a mixed use residential neighborhood where businesses of varied sizes and types can thrive; where people have the opportunity to live in an environmentally sustainable manner; and where the unique existing historic architectural resources are retained and renewed. To accomplish its full potential the neighborhood requires more development, which if properly overseen is something we welcome. However, the type of development outlined in the current Plan is quite likely to retard the current transformation of this neighborhood. Rather than developing into high density residential and mixed use neighborhood stretching from Mission Bay to downtown, the current plan proposes to cut the Central SoMa neighborhood off from the neighborhoods to the south and essentially isolate it.

O-CSN-1.2
LU-3

The Mid-Rise (Reduced Height) Alternative is superior to the High-Rise Alternative in almost every respect. It will create a family-friendly environment with access to light and air. It will create less traffic congestion, and therefore less air pollution and related health effects, and less traffic-related pedestrian injuries. It will allow tall buildings, but clustered near BART on the north side and CalTrain on the south side of the neighborhood, thereby encouraging use of public transportation. The Mid-Rise Alternative would also have reduced greenhouse gas (GHG) impacts since recent research shows that mid-rise buildings are generally more energy efficient than high-rise. By contrast, the High-Rise alternative includes extremely tall buildings (350 feet) on Harrison Street, between Second and Third Streets, which is not close to the CalTrain or BART stations, but is close to the Bay Bridge freeway ramps – thereby encouraging automobile commuting rather than public transit. This contradicts the Plan itself, which “would seek to retain the character of the mid-rise district, limiting the presence of high-rises to areas near transit stations.” (DEIR, p. IV.B-34).

O-CSN-1.3
AL-3

The Mid-Rise Alternative allows for almost as much growth as the High-Rise Alternative. The Initial Study for the Central SoMa Plan (p. 81) shows that the Mid-Rise Alternative is projected to add 52,300 new jobs by 2040, while the High-Rise option is projected to add 56,400 new jobs. The difference in the additional population increments is even smaller, 22,700 versus 23,400 (a 3% difference). Although the DEIR presents slightly different projections, there is still only about a 12-14% difference between the Reduced Height Alternative and the Plan (population growth of 21,900 versus 25,500; job growth of 55,800 versus 63,600). (DEIR p. VI-2, VI-16, IV-6). Thus, the Mid-Rise Alternative would achieve about 90% of the jobs and housing growth, while maintaining the character of Central SoMa as a mid-rise community with access to light and air, avoiding wind-tunnels, and promoting a more family-friendly environment.

Indeed, in 2013 when the Plan was known as the Central Corridor Plan, City Planning staff articulated all of the right reasons for supporting the Mid-Rise Alternative. The Central Corridor Plan stated:

O-CSN-1.3 (cont'd.)

> Urban design experience shows that people feel most comfortable on urban streets where the height of buildings is between ¾ and 1 ¼ times the width of the street, creating an "urban room" that has a pleasing, but not overwhelming, sense of enclosure and intimacy. The Plan proposes that the base height limits along all major streets in the Plan area should be 85 feet, lowering to 65 feet toward the western edge of the Plan area and in historic areas, such as the South End and near South Park. While in some areas the Plan proposes to allow buildings to rise above the 85-foot base height (generally to 130 feet), these upper stories would be required to set back by at least 15 feet in order to maintain the perception of the lower streetwall…. This scale is also consistent with both the traditional form and character of SoMa's significant commercial and industrial buildings as well as aligning with the desire for larger floorplate, open floorplan, mid-rise buildings most desired by contemporary new economy companies.[1]
>
> PRINCIPLE 2: The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk.
>
> The South of Market sits at a critical location in the city's landscape. SoMa is a large expanse of flat land at the center of the east side of the City, sitting as an important balance and counterpoint to the dramatic hills that surround it, including the man-made "hill" of the downtown high-rise district, creating a dramatic amphitheater.

[1] Central Corridor Plan, p. 30.

> With relatively low buildings in comparison to the hills and high-rises around it, the South of Market allows expansive and cherished views to extend across it to and from the surrounding hills, districts and the major features of the region beyond. In order to preserve this essential characteristic and preserve views across the area, height limits taller than 130 feet are generally kept to the southern portion of the Plan Area (Brannan Street southward), limited in distribution and widely spaced. It is important to note that mid-rise buildings are not necessarily synchronous with low densities… Because the number of potential buildings taller than 130 feet is limited to strategic locations adjacent to transit stations and their locations generously spaced, these buildings will be prominent from all directions and serve as local landmarks.[2]

O-CSN-1.3 (cont'd.)

The Neighbors agree entirely with the opinions set forth by City Planning Staff in 2013 in the Central Corridor Plan. "**The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk**." The Mid-Rise Alternative creates an urban neighborhood "that has a pleasing, but not overwhelming sense of enclosure and intimacy." The Mid-Rise Alternative achieves almost all of the housing and job growth, while maintaining a family-friendly, livable neighborhood. We urge the Planning Commission to direct staff to revise the DEIR to select the Mid-Rise (Reduced Height Alternative) as the environmentally preferred alternative, consistent with the staff opinions set forth in the Central Corridor Plan only three short years ago.

In the alternative, the Neighbors request that the City consider an alternative that would modify the proposed Plan to eliminate the proposed changes that would allow extremely tall buildings in the block bounded by I-80 and Folsom and Second and Third Streets (including the tallest buildings on Harrison that go up to 350 feet). These buildings are inconsistent with the Plan's own goals to limit taller buildings to areas near BART and CalTrain. These properties are close to neither BART nor CalTrain, but are at the foot of the Bay Bridge access ramps. Development would therefore encourage automobile usage, not public transit, violating the fundamental Project goals. These properties should be limited to no more than 130 feet, which would still allow for substantial development on the properties, but maintain the mid-rise character of the neighborhood.

O-CSN-1.4

AL-1

The City should also consider creating a park at 350 Second Street. This property is currently a parking lot, and provides a prime opportunity for the City to address the acknowledged need for more parks and open space in the area. In the alternative, development on this parcel should be limited to no more than 130 feet since it is close to neither BART nor CalTrain.

O-CSN-1.5

PD-8

[2] Id. p. 32.

After reviewing the DEIR, together with our team of expert consultants, it is evident that the document contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the DEIR fails as an informational document and fails to impose feasible mitigation measures to reduce the Project's impacts. The Neighbors request the City address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approval of the Project. The Neighbors have submitted expert comments from:

O-CSN-1.6
GC-5

- Urban Planner Terrell Watt, AICP (Exhibit A);
- Environmental Scientists Matthew Hagemann, P.G., C. Hg., and Jessie Jaeger (Exhibit B);
- Traffic Engineer Daniel T. Smith, PE (Exhibit C), and
- Wildlife Biologist Shawn Smallwood, Ph.D. (Exhibit D).

All of these experts conclude that the Plan has numerous impacts that are not adequately analyzed or mitigated in the DIER. The expert comments are submitted herewith and incorporated by reference in their entirety. Each of the comments requires separate responses in the Final EIR. For these reasons, a revised DEIR should be prepared prior to Project approval to analyze all impacts and require implementation of all feasible mitigation measures.

II. BACKGROUND

The Central SoMa Plan (formerly, Central Corridor Plan) is a comprehensive plan for the area surrounding much of southern portion of the Central Subway transit line. The Plan Area includes roughly 230 acres that comprise 17 city blocks, as well as the streets and thoroughfares that connect SoMa to its adjacent neighborhoods: Downtown, Mission Bay, Rincon Hill, and the Mission District. The Plan Area is bounded by Second Street on the east, Sixth Street on the west, Townsend Street on the south, and by an irregular border that generally jogs along Folsom, Howard and Stevenson Streets to the north (see DEIR, Figure II-1, Central SoMa Plan Area Boundaries, in Chapter II, Project Description).

O-CSN-1.7
PD-6

The Plan would fundamentally transform the Central SoMa area. It would ***triple*** the resident population of the area from a current population of 12,000 to 37,500[3] -- an increase of 25,500 additional residents. It would more than ***double*** employment in the area from a current level of 45,600 jobs to 109,200 -- an increase of 63,600 additional jobs. (DEIR, pp. IV-6, IV-5).

[3] Actual current population is closer to 10,000, so the Plan will almost quadruple resident population. This points out the importance of using an accurate baseline population number.

For at least three years, the City presented a plan to the public that extended from Market Street to Townsend and from Second Street to Sixth Street. The plan was called the Central Corridor plan. The plan proposed a Mid-Rise option, in which almost all buildings would be capped at no more than 130 feet or less. The plan also included a High-Rise option. Then, in late 2016, without explanation, the City drastically altered the plan, lopping off 11 blocks at the north from Folsom to Market (with a narrow exception from Fifth to Sixth Street). Critically, at the same time the City dropped the Mid-Rise option and included only the High-Rise option in the analysis. The Mid-Rise Option was relegated to a small section at the back of the alternatives analysis of the DEIR, and renamed the "Reduced-Height Alternative." The City released the DEIR for the completely new project just before the Christmas and New Year holidays, on December 14, 2016.

O-CSN-1.7 (cont'd.)

III. LEGAL STANDARD

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR"). *See*, *e.g.*, Pub. Res. Code § 21100. The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Comms. for a Better Env't v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1). "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs*. (2001) 91 Cal. App. 4th 1344, 1354 ("*Berkeley Jets*"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines §15002(a)(2). If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or

substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub.Res.Code ("PRC") § 21081; CEQA Guidelines § 15092(b)(2)(A) & (B).

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added), quoting, *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 391 409, fn. 12. A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 722; *Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist.* (1997) 60 Cal. App. 4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946.

IV. THE DEIR INCLUDES AN INADEQUATE BASELINE.

The DEIR fails to adequately describe baseline conditions in the Plan area. In several areas there is no baseline analysis at all. In others, the baseline data is far out of date, from 2010. 2010 data is inherently unrepresentative since the City and nation was in the midst of the worst recession since the great depression. Therefore, using 2010 baseline data will inherently bias the entire DEIR analysis.

Every CEQA document must start from a "baseline" assumption. The CEQA "baseline" is the set of environmental conditions against which to compare a project's anticipated impacts. *Communities for a Better Environment v. So Coast Air Qual. Mgmnt. Dist*. (2010) 48 Cal. 4th 310, 321. Section 15125(a) of the CEQA Guidelines (14 C.C.R., § 15125(a)) states in pertinent part that a lead agency's environmental review under CEQA:

O-CSN-1.8

GC-2

> "…must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time [environmental analysis] is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant."

(See, *Save Our Peninsula Committee v. County of Monterey* (2001) 87 Cal.App.4th 99, 124-125 ("*Save Our Peninsula*.") As the court of appeal has explained, "the impacts of the project must be measured against the 'real conditions on the ground.'" (*Save Our Peninsula*,87 Cal.App.4th 99, 121-123.) As the court has explained, using such a skewed baseline "mislead(s) the public" and "draws a red herring across the path of

public input." (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711.)

SoMa is among the most ethnically and economically diverse neighborhoods in the City. The neighborhood is home to 15% of the City's minority and women owned businesses, and 8% of the City's green businesses, which is significant given that the area makes up only 1% of the City's land area.[4] The neighborhood has a slightly higher level of racial diversity than the City as a whole, with about 60% of the population being people of color.[5] Although the median household income is slightly higher than the City average, the neighborhood also has one of the highest levels poverty with 31% of the population living at or below 200% of the poverty threshold.[6]

The neighborhood faces extreme environmental challenges. As the San Francisco Department of Public Health (DPH) stated in a 2012 report:

> due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality in the City, with 13% of households living in an area exposed to greater than 10ug/m3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million.[7]

O-CSN-1.8 (cont'd.)

Asthma and chronic obstructive pulmonary disease hospitalizations are approximately twice as high in Central SoMa as in the rest of the City.[8]

The neighborhood has one of the highest incidences of pedestrian injuries in the City. As DPH stated, "The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8)."[9] The neighborhood also faces "amongst the highest violent and property crime rates in the City. During that time period, the number of assaults per 1,000 residents was 210 in the plan area and 44 for the City as a whole. Likewise, the property crime rate was 900 in the Plan area and 177 for the whole City."[10]

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[4] San Francisco Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 6 (Nov. 30, 2012) (Exhibit F).
[5] Id. p. 21.
[6] Id. p. 3.
[7] Id. p. 3.
[8] Id. p. 22.
[9] Id. p. 3.
[10] Id. p. 4.

Finally, the neighborhood faces a severe lack of open space and parks. The same DPH report stated:

> Public infrastructure areas that the Plan area performs more poorly in include public health facilities and parks and open space. The Recreational Area Access Score assesses relative access to park acreage at any point in the City. Here again the Plan area was one of the lowest performers. Currently 67% of residents live within 1/2 mile of a public recreational facility compared to 91% for the City as a whole. Additionally, only 16% of residents are within 1/4 mile of a community garden compared to 26% across the City.[11]

O-CSN-1.8 (cont'd.)

Thus, while Central SoMa is a robust, ethnically and economically diverse community, it also faces serious challenges in terms of a lack of open space, high levels of pollution, pedestrian safety and extreme traffic congestion. Solving these problems is the key to making the neighborhood livable and family friendly. Very little of this critical baseline information is included in the DEIR, making the document inadequate as a public information document.

Urban Planner Terrell Watt, AICP, explains that the DEIR's baseline data is out of date in many respects, for population, jobs-housing balance, public services and other impacts. (Watt Comment pp. 7-8).

V. THE EIR AND INITIAL STUDY HAVE AN INCONSISTENT AND INADEQUATE PROJECT DESCRIPTION.

A. Initial Study is Inadequate Because it Describes an Entirely Different Project than in the DEIR.

O-CSN-1.9

PD-6

The Initial Study is patently inadequate because it describes an entirely different project from the Plan set forth in the DEIR. The Initial Study must accurately describe the Project in order to identify impacts to be analyzed in the EIR. The Initial Study fails to perform this task because it does not describe the Plan at all. The Initial Study was prepared in 2014. It describes a rectangular project area that extends from Market Street to Townsend and from Second Street to Sixth Street. The Plan set forth in the DEIR is entirely different, with most of the three blocks from Market Street to Folsom excluded from the Plan area. Clearly the Plan will have entirely different impacts than the project described in the Initial Study in all respects, including, but not limited to, traffic, air quality, pedestrian safety, jobs-housing balance, etc. A new initial study is required to analyze the Project actually proposed by the City and to identify impacts requiring analysis in an EIR. The DEIR relies on the Initial Study to conclude that eleven environmental impacts are less than significant. This makes no sense. The City

[11] Id. p. 4.

may not rely on an Initial Study prepared for one project to conclude that a very different project has less than significant impacts. (See, Terrell Watt, AICP, Comments).

The purpose of an initial study is to briefly describe the proposed project and its impacts, and to identify significant impacts requiring analysis in an EIR. 14 CCR §15063. The initial study must contain an accurate description of the proposed project. 14 CCR §15063(d), 15071(a); *Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180. For example, in *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (2013), the court found an initial study to be inadequate because it did not disclose the number of football games to be held at a proposed stadium and it was therefore impossible to calculate the amount of traffic that would be generated by the project. ("Without a reasonable determination of the expected attendance at Hoover evening football games on completion of the Project, District may be unable to adequately compare the baseline attendance to expected attendance in determining whether there is a fair argument the Project may have a significant impact on traffic and/or parking.n22 (Guidelines, §§ 15125, subd. (a), 15126.2, subd. (a); *Communities*, at p. 320 & fn. 5.)")

O-CSN-1.9 (cont'd.)

The project description must include a description of the environmental setting of the Project. A CEQA document "must include a description of the environment in the vicinity of the project, as it exists before the commencement of the project, from both a local and a regional perspective." 14 CCR § 15125; see *Environmental Planning and Info. Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354. "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient [CEQA document]." *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (initial study must describe baseline conditions).

"[T]he Guidelines contemplate that "only one initial study need be prepared for a project. If a project is modified after the study has been prepared, the [lead] agency need not prepare a second initial study." *Gentry v. City of Murrieta*, 36 Cal. App. 4th 1359, 1384 (1995), citing, 1 Kostka & Zischke, supra, § 6.15, at p. 263; see also *Uhler v. City of Encinitas* (1991) 227 Cal. App. 3d 795, 803, disapproved on other grounds in *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal. App. 4th 1597, 1603; Guidelines, § 15063, subd. (a), 15070. However, when changes are made to a project after the initial study, the agency must have substantial evidence to show that the changes are not significant. *Building Code Action v. Energy Resources Conservation & Dev. Com*., 102 Cal. App. 3d 577, 592 (1980). The City lacks substantial evidence to support its conclusion that a second initial study is not required.

1. **The DEIR Project Has a Vastly Different Geographic Scope, Populations and Jobs Projections, and Other Elements than the Initial Study.**

In this case, the 2014 Initial Study does not describe the Project at all. It describes an entirely different project with different project boundaries that is 11 square blocks larger than the Project set forth in the EIR. The project described in the Initial Study clearly has a different baseline than the Project set forth in the EIR, including population, traffic, existing office space, transit ridership, pedestrian safety history, etc. The project described in the Initial Study will also have different impacts in all respects from the Project set forth in the EIR. The Initial Study therefore fails to perform its basic function to describe the Project and its impacts and to identify issues requiring study in the EIR.

Urban Planner Terrell Watt, AICP, describes major differences between the various iterations of the project description. (Watt Comment, p. 5). Growth assumptions in the DEIR, Initial Study and Central SOMA Plan are vastly different:

> Table IV-1, Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ("buildout year" or "planning horizon"). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. DEIR at page IV-5.
>
> Growth projected in the Initial Study includes up to 13,200 housing units (IS at page 85) and 56,400 new jobs (IS at page 81). In contrast, the Central SOMA Plan states: "With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing." Central SOMA Plan at page 7. The Financial Analysis of San Francisco's Central Soma Plan[12] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: "The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years."

O-CSN-1.9 (cont'd.)

Clearly, the population, jobs and growth projections are entirely inconsistent throughout the environmental analysis. Will the Plan results in 7,500 housing units (Central SOMA Plan, p.7), or 14,400 (DEIR, p. IV-5), or 13,200 (IS, p. 85)? Will it create 40,000 new jobs (Financial Analysis), or 63,600 jobs (DEIR, p. IV-5), or 56,400 jobs (IS,

[12] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

p. 81)? Since these figures are fundamental to analysis of almost all other impacts (air pollution, traffic, public services, etc.), this wildly inconsistent project description renders the entire CEQA analysis inadequate. The City simply cannot rely on an Initial Study that assumed 56,400 new jobs, to conclude that a Plan that creates 63,600 new jobs has insignificant impacts.

2. The DEIR Project Has Entirely Different Goals than the Initial Study.

Also, the project described in the Initial Study has very different project goals. The Initial Study project has five project goals:

O-CSN-1.9 (cont'd.)

1. Support transit-oriented growth, particularly workplace growth, in the Central SoMa area.
2. Shape the Central SoMa's urban form recognizing both City and neighborhood contexts.
3. Maintain the Central SoMa's vibrant economic and physical diversity.
4. Support growth with improved streets, additional open space, and other elements of "complete communities."
5. Create a model of sustainable growth.

(Central SOMA Plan Initial Study, p.3, http://sfmea.sfplanning.org/2011.1356E_IS.pdf).

By contrast, the DEIR Project has eight very different goals:

1. Increase the capacity for jobs and housing;
2. Maintain the diversity of residents;
3. Facilitate an economically diversified and lively jobs center;
4. Provide safe and convenient transportation that prioritizes walking, bicycling, and transit;
5. Offer an abundance of parks and recreational opportunities;
6. Create an environmentally sustainable and resilient neighborhood;
7. Preserve and celebrate the neighborhood's cultural heritage; and
8. Ensure that new buildings enhance the character of the neighborhood and the city.

(Central SOMA DEIR, p. S-2, http://sfmea.sfplanning.org/CentralSoMaPlanDEIR_2016-12-14.pdf).

Nowhere does the DEIR explain why the Project goals were so dramatically changed. Nor does the DEIR explain why the Project boundaries were so drastically altered. Clearly, the two projects are entirely different given that the basic project goals differ. A new Initial Study is therefore required to properly describe the Project and its impacts and to identify issues for analysis in a recirculated draft EIR.

3. The DEIR Eliminates the Mid-Rise Option that was Favored by the Central Corridor Plan.

The DEIR also differs from the 2013 Draft Central Corridor Plan in that it "eliminate[s] the 'mid-rise' height limit option (Option A); this option is considered in this EIR as the Reduced Heights Alternative." (DEIR p. II-4). The Mid-Rise Option limited building heights to no more than 130 feet throughout most of the plan area. By contrast, the DEIR Project allows building heights of 350 feet or more at many areas that were formerly limited. This is a drastic change from the Initial Study and Central Corridor Plan since those prior documents strongly favored the Mid-Rise Option. Indeed, in 2013 when the Plan was known as the Central Corridor Plan, City Planning staff articulated all of the right reasons for supporting the Mid-Rise Alternative. The Central Corridor Plan stated:

O-CSN-1.9 (cont'd.)

> Urban design experience shows that people feel most comfortable on urban streets where the height of buildings is between ¾ and 1 ¼ times the width of the street, creating an "urban room" that has a pleasing, but not overwhelming, sense of enclosure and intimacy. The Plan proposes that the base height limits along all major streets in the Plan area should be 85 feet, lowering to 65 feet toward the western edge of the Plan area and in historic areas, such as the South End and near South Park. While in some areas the Plan proposes to allow buildings to rise above the 85-foot base height (generally to 130 feet), these upper stories would be required to set back by at least 15 feet in order to maintain the perception of the lower streetwall…. This scale is also consistent with both the traditional form and character of SoMa's significant commercial and industrial buildings as well as aligning with the desire for larger floorplate, open floorplan, mid-rise buildings most desired by contemporary new economy companies.[13]
>
> PRINCIPLE 2: ***The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk***.
>
> The South of Market sits at a critical location in the city's landscape. SoMa is a large expanse of flat land at the center of the east side of the City, sitting as an important balance and counterpoint to the dramatic hills that surround it, including the man-made "hill" of the downtown high-rise district, creating a dramatic amphitheater.
>
> With relatively low buildings in comparison to the hills and high-rises around it, the South of Market allows expansive and cherished views to extend across it to and from the surrounding hills, districts and the major features of the region

[13] Central Corridor Plan, p. 30.

beyond. In order to preserve this essential characteristic and preserve views across the area, height limits taller than 130 feet are generally kept to the southern portion of the Plan Area (Brannan Street southward), limited in distribution and widely spaced. It is important to note that mid-rise buildings are not necessarily synchronous with low densities… Because the number of potential buildings taller than 130 feet is limited to strategic locations adjacent to transit stations and their locations generously spaced, these buildings will be prominent from all directions and serve as local landmarks.[14]

O-CSN-1.9 (cont'd.)

4. Initial Study and DEIR Use Out-of-Date Baseline Data.

Also, the 2014 Initial Study uses out-of-date baseline data. Population, housing, traffic and other data used for the baseline analysis in the Initial Study was taken in 2010. Of course, 2010 was the height of the last recession. As a result, much of this data does not represent actual current baseline conditions, in which traffic, population, air pollution, and other impacts are all much higher. CEQA requires that the baseline reflect actual current conditions on the ground, not an unrepresentative time period, such as the greatest recession since the great depression. *Communities for a Better Environment v. So Coast Air Qual. Mgmnt. Dist*. (2010) 48 Cal. 4th 310, 321; *Save Our Peninsula Committee v. County of Monterey* (2001) 87 Cal.App.4th 99, 124-125 ("Save Our Peninsula.") As the court of appeal has explained, "the impacts of the project must be measured against the 'real conditions on the ground.'" *Save Our Peninsula*, 87 Cal.App.4th 99, 121-123. As the court has explained, using such a skewed baseline "mislead(s) the public" and "draws a red herring across the path of public input." *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711.

O-CSN-1.10

GC-2

Urban Planner Terrell Watt, AICP, explains that baseline data for employment, housing, population, public services, jobs-housing balance, and many other factors are either absent or out of date.

5. City Staff Refused to Grant an Extension of the Comment Period Despite Massive Project Revisions and Two Federal Holidays.

O-CSN-1.11

GC-3

Exacerbating this problem is the fact that for at least three years, City staff led the public to believe that the project was as described in the Initial Study. In particular, the 2013 Central Corridor plan document strongly favored the Mid-Rise Alternative over the High-Rise Alternative, and described a project extending all the way to Market Street. Then, just a week before the holidays, on December 14, 2016, the City released the DEIR for a short 60-day comment period, for the first time unveiling the very different Project in the DEIR. CEQA does not countenance such "bait-and-switch"

[14] Id. p. 32.

tactics which serve only to confuse and mislead the public and short-circuit the public process embodied in CEQA. "An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles* (1977), 71 Cal.App.3d 185 (rejecting an EIR that changed the project description over the course of the CEQA review process). The City has done the opposite – radically changing the project description after years of processes and public meetings in which an entirely different project was presented to the public. Despite this sleight of hand, the City flatly refused any extension of the public comment period, despite admitting that the situation met all of the City's criteria for an extension, particularly given that the comment period fell over both the Christmas and New Year's holidays. The City's Environmental Review Officer responded to three separate requests for extension by stating:

O-CSN-1.11 (cont'd.)

> The Planning Department has identified a number of situations that may warrant longer public review' periods, such as those including projects affecting multiple sites in various locations, or an area larger than a single site; or in situations where multiple federally recognized holidays occur within a DEIR's 45-day the public review period. Both situations apply to the Central SoMa Plan DEIR.

(Letter from Lisa M. Gibson, San Francisco Environmental Review Officer (Feb. 3, 2017). Despite admitting that the criteria for an extension had been met, the City proceeded to reject the extension request.

The City makes a mockery of CEQA and the public process. "Public participation is an essential part of the CEQA process." (CEQA Guidelines §15201). "Environmental review derives its vitality from public participation." (*Ocean View Estates Homeowners Assn. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400). By dramatically altering the Project after years of public review, on the eve of the holiday season, and then refusing to extend the public comment period, the City "mislead(s) the public" and "draws a red herring across the path of public input." *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; *Woodward Park Homeowners v. City of Fresno* (2007) 150 Cal.App.4th 683, 708-711.

VI. THE PROJECT IS FATALLY INCONSISTENT WITH THE GENERAL PLAN AND OTHER APPLICABLE PLANNING DOCUMENTS.

The DEIR incorrectly concludes that the Project is consistent with the General Plan and other applicable planning documents. In fact, the proposed Plan is plainly inconsistent with these planning documents, resulting in significant adverse environmental impacts.

O-CSN-1.12

PP-4

The City must treat its analysis of conflicts with the General Plan seriously and land use decisions must be consistent with the plan. (CEQA Guidelines, App. G, Evaluation of Environmental Impacts, Item 6; Guidelines § 15125(d); Gov. Code §

65860(a)) The General Plan is intended to be the "constitution for all future developments," a "charter for future development," that embodies "fundamental land use decisions that guide the future growth and development of cities and counties." (*Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors of El Dorado County* (1998) 62 Cal.App.4th 1334, 1335; *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531,54; *City of Santa Ana v. City of Garden Grove* (1979) 100 Cal.App.3d 521,532) The "propriety of virtually any local decision affecting land use and development depends upon consistency with applicable general plan and its elements." (*Citizens of Goleta Valley v. Board of Supervisors of County of Santa Barbara* (1990) 52 Cal.3d 553, 570) The consistency doctrine has been described as the "linchpin of California's land use and development laws; it is the principal which infuses the concept of planned growth with the force of law." *Corona-Norco Unified School District v. City of Corona* (1993) 17 Cal.App.4th 985, 994.

O-CSN-1.12 (cont'd.)

A project's impacts may be deemed significant if they are greater than those deemed acceptable in a general plan or other applicable planning documents. (*Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416). A significant impact on land use and planning would occur if the project would "[c]onflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect." (CEQA Guidelines Appendix G, § IX(b))

According to the CEQA Guidelines, "environmental effects" include direct and indirect impacts to land use and planning. Where the plan or policy was adopted to avoid negative environmental effects, conflicts with the plan or policy constitutes a significant negative impact. (*Oro Fino Gold Mining Corp. v. Co. of el Dorado* (1990) 225 Cal.App.3d 872, 881-882; *see also Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4; *County of El Dorado v. Dept. of Transp*. (2005) 133 Cal.App.4th 1376; CEQA Guidelines, App. G., § IX(b)). Thus, under CEQA, a project results in a significant effect on the environment if the project is inconsistent with an applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating one or more of these environmental effects.

The DEIR fails to conduct a complete and forthright consistency analysis with the General Plan and other applicable planning documents. The DEIR must be revised to analyze inconsistencies identify appropriate mitigations or set the foundation for a finding of overriding considerations.

The Plan is inconsistent with Policy 3.5 of the General Plan, which states, "Ensure that growth will not outpace improvements to transit of the circulation system." (DEIR P. III-9). The DEIR admits that the Plan would "result in substantial delays to a number of MUNI routes serving the area," (DEIR, p. IV.D-49), and "Development under the Plan … would result in a substantial increase in transit demand that would not be

accommodated by local transit capacity, and would cause a substantial increase in delays resulting in adverse impacts on local and regional transit routes." (DEIR, p. IV.D-43). This impact to transit is not only a significant impact under CEQA, it is prohibited by the General Plan. The DEIR's conclusion that the Plan does not conflict with this General Plan Policy is arbitrary and capricious.

The Plan is inconsistent with the Urban Design Element of the General Plan, which states:

> Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development; and
>
> Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction

O-CSN-1.12 (cont'd.)

(DEIR p. III-10). The Plan allows buildings of 350 feet or more in an area that the City admits is a mid-rise neighborhood. As noted in the Central Corridor Plan, such tall buildings are inconsistent with the mid-rise character of the neighborhood. The City stated in the Central Corridor Plan, at page 32, "The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk." Having made these statements in the Central Corridor Plan, the City cannot not simply ignore them. The court in the case *Stanislaus Audobon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144 rejected a county's argument that a revised initial study prepared by the county which contradicted the findings of the first initial study had not "relegated the first initial study to oblivion." *Id.* at 154. The court stated, "We analogize such an untenable position to the ***unringing of a bell.*** The first initial study is part of the record. The fact that a revised initial study was later prepared does not make the first initial study any less a record entry nor does it diminish its significance, particularly when the revised study does not conclude that the project would not be growth inducing but instead simply proceeds on the assumption that evaluation of future housing can be deferred until such housing is proposed." (*Id*. at 154 (emphasis added)). The City cannot conclude that a project may have significant impacts and then, when such admission is no longer convenient, simply change its conclusion to better suit its needs. The City conclusion of "no inconsistencies" with the General Plan (DEIR, p. III-10) are refuted by its own statements in the Central Corridor Plan.

The Plan is inconsistent with the Recreation and Open Space Element of the General Plan, Policy 1.9: Preserve sunlight in public open spaces. (DEIR, p. III-11). The DEIR admits that the Plan will create new shadow on several parks under the jurisdiction of the Recreation and Park Department, including South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several public open spaces. (DEIR, p. III-11). For example the DEIR admits that the Plan will create new shadows on the only Rec & Park property in the Plan area, South Park, and "could

increase shadow on portions of South Park during early morning and late afternoon hours from the spring equinox to the fall equinox (March through September). (DEIR, p. IV.H-35). In other words, the Plan will cast shadows on South Park for half of the year! Similarly, the DEIR admits that the Plan will cast shadows on the heavily used privately owned public open space (POPOS) located at 303 Second Street from noon "through much of the afternoon," and shading up to one-third of the POPOS. (DEIR p. IV.H-38).Given these admissions, the DEIR's finding that the Plan is somehow consistent with the General Plan Policy to "preserve sunlight in public open spaces" is arbitrary and capricious and lacks substantial evidence. Casting additional shadows for half of the year simply cannot be considered consistent with the policy of "preserving sunlight in public open spaces."

O-CSN-1.12 (cont'd.)

The Plan is also inconsistent with the General Plan Objective 9: Reduce transportation-related noise, and Policy 11.1, Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. (DEIR p. III-12). The DEIR admits that "Development under the Plan, including the proposed street network changes, would generate noise that would result in exposure of persons to noise in excess of standards in the San Francisco General Plan or Noise Ordinance (Article 29 of the Police Code), and would result in a substantial permanent increase in ambient noise above existing levels." (DEIR, p. S-71). Thus, the Plan will increase transportation-related noise and place new uses in areas that exceed noise guidelines, in direct violation of the General Plan. The DEIR's conclusion of General Plan consistency is therefore arbitrary and capricious.

The Plan is plainly inconsistent with the Western SoMa Plan, yet the DEIR inexplicably concludes that the Plan would "not be demonstrably inconsistent with the Western SoMa Plan." (DEIR, p. III-8). Most obviously, the Western SoMa Plan Policy 1.2.4 is to "Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street." (DEIR, p. III-6). The Plan is flatly inconsistent with this Policy, thereby resulting in a significant environmental impact that is not addressed in the DEIR.

A revised DEIR is required to acknowledge, address and mitigate these plan inconsistencies.

VII. THE DEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE SIGNIFICANT IMPACTS OF THE PLAN.

O-CSN-1.13

GC-5

At its core, CEQA requires the lead agency to identify all significant adverse impacts of a project and adopt all feasible mitigation measures or alternatives to reduce those impacts. 14 Cal. Code Regs. § 15002(a)(1). A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 722]; *Galante Vineyards v. Monterey Peninsula Water Management*

Dist. (1997) 60 Cal. App. 4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946). The DEIR fails to meet these basic requirements. O-CSN-1.13 (cont'd.)

A. The Plan will have Significant Adverse Traffic Impacts that are not Disclosed or Analyzed in the DEIR.

1. The Plan will Increase Employee VMT, Resulting in a Significant Traffic Impact Under SB 743.

O-CSN-1.14

TR-3

The Plan will place thousands of cars each day into an area that already has unacceptable levels of traffic congestion. At rush hour, traffic is at a standstill in the Plan area. The Plan will add over 63,000 new jobs and 25,000 new residents to the area – more than doubling the number of jobs and tripling the number of residents in the area. (DEIR, p. IV-6). While many of these workers and residents may take public transit, there can be no dispute that many will drive cars, thereby adding to already unacceptable levels of traffic. The DEIR glosses over this obvious fact and makes the preposterous conclusion that the Plan will have less than significant traffic impacts. This conclusion simply fails the straight-face test. Anyone who has spent any time on roadways in this area will recognize that tripling the population of the area will have significant traffic impacts.

The DEIR relies on the recently passed SB 743 (Pub.Res.Code § 21099(b)(1)) for its counterfactual conclusion of not traffic impacts. However, even under the vehicle miles travelled (VMT) approach set forth in SB 743, the Plan will have significant traffic impacts. The SB743 regulations, 14 Cal.Code Regs. §15064.3, specify that a land use plan may have a significant impact on transportation if it is not consistent with the relevant sustainable community strategy (SCS). To be consistent with the SCS, the development must lead to VMT equal to or less than the VMT per capita ***and*** VMT per employee specified in the SCS. Plan Bay Area is the SCS (DEIR, p. VI.D-36), and it sets VMT target per capita at 10% below the 2005 Bay Area average. However, it does not set any target for employee VMT. (DEIR, p. IV.D-21, IV.D-36) Therefore, the city cannot claim that the development meets employee VMT targets in the SCS -- there are none. Even worse, the DEIR concludes that the plan will ***increase*** employment VMT from 8.2 to 8.7 in 2012 and from 6.8 to 7.1 in 2040. (DEIR p. IV.D-38). "With Plan implementation, VMT per capita would … increase slightly in the office category." (DEIR, p. IV.D-38). This should be no surprise since the Plan creates 63,000 new jobs, but only 25,000 new residents, so about 40,000 of the new employees will have to commute long distances. Since the plan will ***increase*** employee VMT, it has a significant traffic impacts even under the new VMT methodology set forth in SB 743. As a result, the City' conclusion that the Plan has less than significant traffic impacts is arbitrary and capricious and the City has failed to proceed in a manner required by law. The City must acknowledge a significant traffic impact in a revised DEIR, analyze the

traffic impact, and implement all feasible mitigation measures and alternative to reduce this impact and consider all feasible alternatives.

Also, as discussed by Traffic Engineer Daniel T. Smith, PE, the Plan will drastically increase VMT in the Plan area. Mr. Smith explains:

> DEIR Table IV-1 indicates that in the baseline (2010) condition, the Central SoMA population was 12,000, that in 2040 without the Project it would be 28,200, and in 2040 with the Project it would be 37,500. The same table also indicates that in the baseline year employment in Central SoMa was 45,600, that in 2040 without the Project it would be 72,800 and that in 2040 with the Project employment would be 109,200 jobs. At the VMT per capita rates disclosed in DEIR Table IV.D-6, the following would be total VMT generated in Central SoMa:
>
> | | Baseline | 2040 No Project | 2040 With Project |
> |---|---|---|---|
> | Population | 25,200 | 50,760 | 60,000 |
> | Employment | 373,920 | 495,040 | 775,320 |
> | Total | 399,120 | 545,800 | 935,320 |
>
> As can be seen from the above compilations, the 2030 No Project scenario generates almost 37 percent more net VMT than the Baseline; **the 2040 With Project scenario generates over 134 percent more net VMT than the Baseline and over 71 percent more than the 2040 No Project Scenario.** Since the public knows from information presented in this DEIR and from other recent DEIR's for projects having transportation effects on the Central SoMa area that there are already problems impacting motor vehicle traffic, bicyclists, pedestrians, the safety of all of the aforementioned, and transit operations. In that situation adding development to the area that generates 134 percent more than existing uses and 71 percent more than development to 2040 under existing plans and zoning is significantly impactful on transportation

(Smith Comment, p. 2). Since the Plan will increase VMT, the City must conclude that it will have significant impacts even under SB 743.

O-CSN-1.14 (cont'd.)

2. The Plan will have Highly Significant Traffic Impacts.

Traffic Engineer Daniel T. Smith, P.E. shows that the Plan will have highly significant traffic impacts and will create massive delays and traffic congestion in the plan area. Mr. Smith concludes (Smith Comment pp. 3-4):

O-CSN-1.15

TR-4

- With the Project traffic and the Howard/Folsom one-way street configuration option, in the AM peak, intersections experiencing delay levels at LOS E or worse (55 seconds or more average delay per vehicle) would increase from 3 of the 36 studied under the existing condition to 21 of 36. In the PM peak, with the

Project and the Howard/Folsom one-way street configuration, the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 39 of 80 with the Project traffic and subject street configuration

- With the Howard/Folsom two-way street configuration option, in the AM peak, the number of intersections operating at LOS E or worse would increase from 3 of 36 in the existing condition to 17 of 36 with the plan and the subject street configuration. In the pm peak the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 37 of 80 with Project traffic and the two way street configuration.
- As to the freeway ramp analysis, 8 of the 11 ramps analyzed operate at vehicle densities of 35 passenger cars per mile per lane (volumes reflecting breakdown conditions) in the AM and/or PM peak in the existing condition. With the addition of Project related traffic and the proposed street network changes, 10 of the 11 ramps would operate at vehicle densities of 35 passenger cars per mile per lane in the AM and/or Pm peak hour.

O-CSN-1.15 (cont'd.)

3. The Traffic Analysis Uses an Improper Baseline.

As discussed above, CEQA requires the agency to use a baseline that represents real conditions on the ground at the time of CEQA review. Mr. Smith concludes that the DEIR fails to use a representative traffic baseline. The DEIR relies on traffic baseline data from 2011 and earlier. This data reflects a recessionary period. It does not reflect much higher traffic currently found in the area.

O-CSN-1.16

GC-2

4. The Plan Will Have Significant Adverse Impacts to Emergency Vehicle Access.

Mr. Smith concludes that the Plan will have significant adverse impacts to emergency vehicle access that are not disclosed or analyzed in the DEIR. (Smith Comment, p. 7). The DEIR asserts without foundation that although traffic congestion would occur, that the California Vehicle Code requires that other motor vehicles get out of the way of emergency vehicles and because emergency vehicles primarily use arterial streets where there is purportedly room to get out of the way of emergency vehicles, despite the fact that the DEIR admits there would be increased traffic congestion with the Project, it asserts without sound foundation that there would be no significant impact on emergency vehicle traffic. This assertion is inconsistent with the information in the DEIR's traffic impact analysis at DEIR pages IV.D-41 through 43 which indicate that:

O-CSN-1.17

TR-12

- With the Project, 10 of 11 freeway ramps serving the Project area would be at "breakdown levels" during the AM and/or PM peak periods. Breakdown levels on the on ramps causes extensive queuing on City surface streets that would impair emergency vehicle traffic even on arterials because other drivers may not have

> the room to comply with the Vehicle Code and get out of the way quickly. "Breakdown levels" on the off ramps involves queues onto the freeway mainlines. The confined ramps provide motorists little opportunity to comply with the vehicle code and get out of the way and motorists at the critical ramp exit points will not even know that an emergency vehicle is coming until it has slowly worked its way toward the head of the exit queue.

- With the Project, up to 21 of the 36 study area intersections that were analyzed for the AM peak hour and up to 39 of the 80 study area intersections that were analyzed for the PM peak hour are reported to experience highly deficient delay conditions. At these traffic delay levels that imply significant queuing, even on arterial width roadways, traffic is likely to be too congested to comply with the Vehicle Code mandate to get out of the way of emergency vehicles.

O-CSN-1.17 (cont'd.)

The DEIR's unsubstantiated and conclusory statements about emergency vehicle access impacts of the Project must be revised and made consistent with findings made elsewhere in the DEIR.

5. The Plan will have Significant Parking Impacts that are Not Disclosed or Mitigated in the DEIR.

Parking impacts are significant under CEQA. In *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1051 (2013), the court rejected the City of San Francisco's position that parking impacts are not significant impacts under CEQA, holding, "Therefore, as a general rule, we believe CEQA considers a project's impact on parking of vehicles to be a physical impact that could constitute a significant effect on the environment." "To the extent the lack of parking affects humans, that factor may be considered in determining whether the project's effect on parking is significant under CEQA." *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1053.

O-CSN-1.18

TR-11

The Plan will have significant parking impacts. The DEIR admits that the Plan will create a shortfall of parking of 15,500 parking spaces. (DEIR, p. IV.D-77). The DEIR states:

> there could be a shortfall in parking spaces provided relative to the projected demand (i.e., a shortfall of about 15,550 parking spaces). This shortfall could be greater if development projects provide less than the maximum permitted parking spaces. It is anticipated that a portion of the shortfall would be accommodated on-street, particularly the overnight residential parking demand, and a portion of the shortfall could potentially be accommodated off-street in public parking facilities serving the daytime non-residential parking demand (e.g., the SFMTA Fifth & Mission/Yerba Buena Garage). As a result of the parking shortfall, some

> drivers may circle around the neighborhood in search of parking, which would increase traffic congestion on the local street network.

Id. Despite these statement, the DEIR concludes that parking impacts would be less than significant. (DEIR, p. IV.D-78). This conclusion simply does not logically follow from the DEIR's own analysis. As such it is arbitrary and capricious.

O-CSN-1.18 (cont'd.)

6. The Traffic Analysis Fails to Analyze Cumulative Impacts.

Traffic Engineer Smith concludes that the traffic analysis fails to include many reasonably foreseeable future projects, such as Pier 70 in the nearby Dogpatch neighborhood, and many others. These projects will have cumulative traffic impacts together with the Project, which are not analyzed or mitigated in the DEIR.

O-CSN-1.19

CU-3

B. The Plan will have Significant Adverse Air Quality Impacts that are not Disclosed or Analyzed in the DEIR.

As discussed by environmental consultants, Matthew Hagemann, C.Hg., and Jessie Jaeger, B.S., or Soil Water Air Protection Enterprise (SWAPE), the air quality analysis is woefully inadequate. SWAPE states:

O-CSN-1.20

AQ-1

> The DEIR concludes that the Plan would have a less than significant air quality impact (p. IV.F-33). This conclusion, however, is incorrect for several reasons. First, the air quality analysis conducted within the DEIR is based on outdated baseline data that do not accurately reflect current traffic, air quality, pedestrian safety, and population within the Plan area. Second, the DEIR fails to account for all major development projects currently being considered within the area. As a result, the Plan's net increase in criteria air pollutants within the area, as well as it's cumulative air quality impact, are misrepresented. Due to these reasons, we find the DEIR's air quality analysis and resultant significance determination to be inadequate, and require that an updated DEIR be prepared to adequately evaluate the Plan's air quality impact. (Exhibit B, p.1).

While the DEIR admits that individual projects built pursuant to the Plan may have significant impacts, (DEIR, p. IV.F-34), it fails to acknowledge that these individual projects are made possible only because of the Plan and it is therefore the Plan itself that has significant impacts, as well as the individual projects. In essence, the City acknowledges individual impacts of specific projects, while ignoring cumulative impacts of the Plan.

1. Air Quality Baseline Analysis is Inadequate.

O-CSN-1.21

GC-2

First the air quality analysis cannot be adequate if it uses an erroneous baseline. *CBE v. SCAQMD, supra*. The DEIR fails to disclose that the San Francisco Department

of Public Health has determined Plan area has among the worst air quality in the City, due primarily to extreme traffic congestion. An SFDPH 2012 report states:

> due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality in the City, with 13% of households living in an area exposed to greater than 10ug/m3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million.[15]

Asthma and chronic obstructive pulmonary disease hospitalizations are approximately twice as high in Central SoMa as in the rest of the City.[16] Almost the entire Plan area is in an Air Pollution Exposure Zone (APEZ), meaning that airborne cancer risks exceed 100 per million. (DEIR, Figure IV.F-1). Without this critical baseline information, the DEIR analysis is meaningless. *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*., 215 Cal. App. 4th 1013, 1049 (Cal. App. 4th Dist. 2013) ("Without a reasonable determination of the expected attendance at Hoover evening football games on completion of the Project, District may be unable to adequately compare the baseline attendance to expected attendance in determining whether there is a fair argument the Project may have a significant impact on traffic and/or parking.n22 (Guidelines, §§ 15125, subd. (a), 15126.2, subd. (a); *Communities*, at p. 320 & fn. 5.)")

O-CSN-1.21 (cont'd.)

In *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d at 718, the court concluded that an EIR inadequately considered an air pollution (ozone) cumulative impact. The court said: "The [ ] EIR concludes the project's contributions to ozone levels in the area would be immeasurable and, therefore, insignificant because the [cogeneration] plant would emit relatively minor amounts of [ozone] precursors compared to the total volume of [ozone] precursors emitted in Kings County. The EIR's analysis uses the magnitude of the current ozone problem in the air basin in order to trivialize the project's impact." The court concluded: "The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but ***whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin***." (Emphasis added). The *Kings County* case was reaffirmed in *Communities for a Better Environment v. Cal. Res. Agency*, 103 Cal.App.4th at 116, where the court rejected cases with a narrower construction of "cumulative impacts."

As in Kings County, given the already extreme air pollution problems facing the Plan area, the Project's air quality impacts are even more significant. The DEIR glosses over this issue by failing to acknowledge the air pollution baseline.

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[15] Id. p. 3.
[16] Id. p. 22.

2. Plan Exceeds Applicable CEQA Significance Thresholds.

The DEIR erroneously concludes that the Plan will have less than significant air quality impacts. (DEIR, p. IV.F-33). The DEIR bases this conclusion on the allegation that growth in VMT will be less than growth in population. Id. However, as discussed above, employee VMT will actually increase under the Plan. Therefore, this conclusion is contradicted by the facts and is arbitrary and capricious.

O-CSN-1.22

AQ-1

a. DEIR Violates SB 743 by Basing Air Quality Impacts on VMT.

SB 743, expressly states that even if VMT is reduced (which it is not), the agency must still analyze air quality impacts and pedestrian safety impacts, among others. Pub. Res. Code §21099(b) states:

> (3) This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.[17]

The City has done precisely what is prohibited by SB 743. The City concludes (erroneously) that since the Plan reduces VMT, it does not have significant air pollution impacts. SB 743 prohibits this type of analysis and requires an independent analysis of air quality impacts. Therefore, the City has failed to proceed in a manner required by law and has thereby abused its discretion.

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[17] OPR Draft Regulations for SB 743, p. III:15 (Jan. 20, 2016) state:

> Models can work together. For example, agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location. However, in doing so, agencies should be careful to avoid double counting if the sketch model includes other inputs or toggles that are proxies for trip length (e.g. distance to city center). Generally, if an agency changes any sketch model defaults, it should record and report those changes for transparency of analysis. Again, trip length data should come from the same source as data used to calculate thresholds, to be sure of an "apples-to-apples" comparison.

b. Plan Has Highly Significant Air Quality Impacts Related to Criteria Air Pollutants.

The DEIR acknowledges that the BAAQMD has established CEQA significance thresholds for air pollution, and that these thresholds apply to the Plan. (DEIR, p. IV.F.1; IV.F-7; IV.F-35).

O-CSN-1.23

AQ-1

- Under BAAQMD CEQA Guidelines, a CEQA project with more than 510 apartments are condominiums will have significant emissions of the zone precursor, reactive organic gases (ROGs). (DEIR, p. IV.F-35). The Plan will result in 14,400 new housing units in the Plan area – 28 times above the BAAQMD CEQA significance threshold!
- Under the BAAQMD CEQA Guidelines, a project with more than 346,000 square feet of office space will have significant emission of the ozone-precursor, nitrogen oxides (NOx). (DEIR, p. IV.F-35). The Plan will allow 10,430,000 square feet of office space – 30 times above the BAAQMD CEQA Threshold.

When an impact exceeds a duly adopted CEQA significance threshold, as here, the agency abuses its discretion if it refuses to acknowledge a significant impact. Indeed, in many instances, such air quality thresholds are the only criteria reviewed and treated as dispositive in evaluating the significance of a project's air quality impacts. *See, e.g. Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 960 (County applies BAAQMD's "published CEQA quantitative criteria" and "threshold level of cumulative significance"). *See also Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 110-111 ("A 'threshold of significance' for a given environmental effect is simply that level at which the lead agency finds the effects of the project to be significant"). The California Supreme Court recently made clear the substantial importance that a BAAQMD significance threshold plays in providing substantial evidence of a significant adverse impact. *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 327 ("As the [South Coast Air Quality Management] District's established significance threshold for NOx is 55 pounds per day, these estimates [of NOx emissions of 201 to 456 pounds per day] constitute substantial evidence supporting a fair argument for a significant adverse impact"). The City has abused its discretion by failing to disclose the Plan's significant criteria air pollutant impacts. A recirculated DEIR is required to disclose this impact and propose all feasible mitigation measures.

c. Plan Has Highly Significant Air Quality Impacts Related to Toxic Air Contaminants.

O-CSN-1.24

AQ-2

Almost the entire Plan area is already listed as an Air Pollution Exposure Zone (APEZ), meaning air pollution-related cancer risk already exceeds 100 per million. (DEIR Figure VI.F-1). Under BAAQMD CEQA significance thresholds, any increase in cancer risk above 10 per million is considered significant. (DEIR, p. IV.F.23). The DEIR admits that "as a result of Plan-generated traffic … excess cancer risk within the Air Pollutant Exposure Zone would increase by as much as 226 in a million and PM-2.5 concentrations would increase by up to 4.54 ug/m3 at individual receptor points. These levesl substantially exceed the thresholds identified in the Approach and Analysis subsection." (DEIR p. IV.F.-48). In other words, the Plan will cause cancer risk to almost triple in the Plan area, from 100 per million to 326 per million. The increase of 226 per million exceeds the CEQA significance threshold by 22 times. Of particular concern to the Neighbors is the fact that the property at 631 Folsom, is currently not with the APEZ. (DEIR Figure VI.F-1). However, with Plan implementation, the property will exceed the cancer risk threshold and it will be re-designated as part of the APEZ. (DEIR, Figure IV.F-3). This is a particular concern to the Neighbors because the building is not equipped with high efficiency air filtration (MERV-13), and the DEIR includes no mitigation measure to require retrofitting of existing buildings with filtration.

O-CSN-1.24 (cont'd.)

d. The DEIR Contains Inadequate Air Pollution Mitigation and Alternatives.

While the DEIR acknowledges that the Plan has significant impacts related to toxic air contaminants (TACs), it does not impose all feasible mitigation measures to reduce such impacts. The DEIR contains only four weak mitigation measures to reduce air quality impacts: 1) electrical hook-ups for diesel trucks at refrigerated warehouses; 2) low-VOC paints; 3) best available control technology for diesel back-up generators; and 4) "other measures" to reduce air pollutant emissions.

O-CSN-1.25

i. DEIR Improperly Relies on Deferred Air Mitigation.

AQ-2

The fourth mitigation measure is a clear example of deferred mitigation that is prohibited by CEQA. CEQA requires mitigation measures to be clearly set forth in the EIR so that the public may analyze them and their adequacy. "Other" undefined measures provides not specificity. Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency's decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. Guidelines, section 15126.4(a)(1)(B) states: "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."

"A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307.) "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92 (Communities).)

The fourth mitigation measure is a clear example of deferred mitigation prohibited by CEQA. A new DEIR is required to clearly identify specific mitigation measures that will be required to reduce air pollution impacts.

ii. DEIR Fails to Analyze or Require all Feasible Mitigation Measures.

O-CSN-1.25 (cont'd.)

There are numerous feasible mitigation measures that should be required to reduce the Plan's air quality impacts. The California Attorney General has published a list of feasible measures to reduce greenhouse gas emissions from projects and area plans. (Addressing Climate Change at the Project Level, California Attorney General's Office, Available at http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, Exhibit E). These same measures would reduce the Plans emissions of NOx, ROGs and TACs. All of the measures in the Attorney General document should be analyzed in a revised DEIR and imposed a mandatory mitigation measures. These measures include, but are not limited to:

- Energy efficiency audits of existing buildings.
- Energy efficiency upgrades to existing buildings not otherwise required by law, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization (perhaps targeted to specific communities, such as low-income or senior residents).
- Programs to encourage the purchase and use of energy efficient vehicles, appliances, equipment and lighting.
- Programs that create incentives to replace or retire polluting vehicles and engines.
- Programs to expand the use of renewable energy and energy storage.
- Preservation and/or enhancement of existing natural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.
- Improvement and expansion of public transit and low- and zero-carbon transportation alternatives.
- Requiring solar photo-voltaic panels on all new and existing buildings.

- Require Energy Star Appliances in all new buildings.
- Require energy efficient lighting in all new buildings, particularly LED.
- Require all new buildings to be LEED certified.
- Require solar hot water heaters.
- Require water-efficiency measures.
- Require energy storage facilities to store solar energy.
- Require electric vehicle charging stations to encourage use of the clean cars.

O-CSN-1.25 (cont'd.)

All of these measures are feasible and should be analyzed in a revised DEIR.

C. The Plan will have Significant Adverse Visual Impacts that are not Disclosed or Analyzed in the DEIR.

The Plan will have significant adverse visual impacts because it conflicts with height and bulk prevailing in the area. As discussed above, the Plan is inconsistent with the Urban Design Element of the General Plan, which states:

> Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development; and
>
> Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction

(DEIR p. III-10). The Plan allows buildings of 350 feet or more in an area that the City admits is a mid-rise neighborhood. This is not only inconsistent with the General Plan, but also with the Plan's own Goal 8.3: "Reinforce the character of Central SoMa as a mid-rise district with tangible 'urban rooms.'" (DEIR, p. II-23). The DEIR states, "some observers could be more keenly aware of any increase in building height or overall density, and these observers could find these changes substantially disruptive." (DEIR, p. IV-B.32). The DEIR states that the "Plan would seek to retain the character of the mid-rise district, limiting the presence of high-rises to areas near transit stations," (DEIR, p. IV.B-34), yet by allowing 350 buildings on Second and Harrison, the Plan violates this principle.

O-CSN-1.26
AE-2

As noted in the Central Corridor Plan, such tall buildings are inconsistent with the mid-rise character of the neighborhood. The City stated in the Central Corridor Plan, at page 32, "The predominant character of SoMa as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk." The Central Corridor Plan also stated:

> Given the amount of high-rise space recently enabled through the Transit Center District Plan and goals to build on and complement the character of SoMa, this Plan does not envision high rise development as a major component of the Central Corridor Plan. Rather, it promotes the kind of mid-rise development that

> is more in line with SoMa's current character and can also enable the large floorplate work spaces that are in high demand, yet difficult to find and secure, in central City locations.
>
> In general, the mid-rise heights set by the plan provide for the same, and in some cases even more, density that would be provided with taller buildings. The large floor-plates possible on large development sites, combined with heights ranging from 8 to 12 stories, enables a significant amount of density. Conversely, the combination of necessary bulk limitations, tower separation requirements for high rise buildings and the realities of designing elegant tall buildings that maximize light, air and views to both tenants and the neighborhood, limits the amount of incremental additional development possible with a tower prototype. For instance, on a 100,000 square foot site, a mid-rise building at 130 feet in height would yield more development space than two 200-foot towers constructed above an 85-foot base on the same site.
>
> However, to enable the option for more high-rise buildings, the Plan does include a High Rise Alternative, which amplifies height limits in certain areas, expanding opportunities for buildings taller than 130 feet.

O-CSN-1.26 (cont'd.)

Central Corridor Plan, p. 116. Having made these statements in the Central Corridor Plan, the City cannot not simply "unring the bell." *Stanislaus Audobon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144. The DEIR's conclusion that the Plan has no significant visual impacts is arbitrary and capricious and ignore the conflicts with the General Plan. (DEIR, p. IV.B-33).

By allowing very tall buildings throughout the Plan area, the Plan conflicts with the Urban Design Element, and creates a significant aesthetic impact on the neighborhood. This impact must be disclosed and mitigated in a revised DEIR. The most obvious was to reduce this impact is for the City to adopt the Reduced Height (Mid-Rise) alternatives.

D. The Plan will have Significant Adverse Growth-Inducing Impacts that are Inadequately Analyzed in the DEIR.

CEQA requires that an EIR include a detailed statement setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code Section 21100(b)(5). A proposed project is either directly or indirectly growth inducing if it: (1) fosters economic or population growth or requires additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. CEQA Guidelines Section 15126.2(d). While growth inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., traffic, air pollution, etc.) may be significant and adverse. In such cases,

O-CSN-1.27

OC-3

the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project. The analysis required is similar in some respects to the analysis required to analyze impacts associated with population and housing.

Urban Planner Terrell Watt, AICP, explains that the DEIR contains a discussion of Growth Inducement at Section V.D. The discussion acknowledges the proposed zoning changes under the Project would expand the Plan Area's capacity for growth through a planning horizon year of 2040, during which time up to an additional 14,500 residential units and up to an additional 63,600 jobs could be accommodated in the Plan Area. The discussion provides no analysis of the Project's potential to induce growth in accordance with CEQA, nor does the discussion reach any conclusions as to the significance of growth inducing impacts instead relying on the assertion that the growth allowed by the Project is simply an accommodation of growth projected for the region.

Watt states:

O-CSN-1.27 (cont'd.)

> There is no question the Project will allow substantial growth in the Central SOMA neighborhood; more than an increase of 450 percent for jobs and at least 300 percent for housing. Due to the Project's high employment to housing ratio regardless of which jobs growth assumption, the Project will result in additional demand for housing in the Project area or beyond. In addition, substantial new non-residential and residential growth will require additional public services, likely including expansion and therefore construction of facilities in the neighborhood or adjacent neighborhoods. Yet the DEIR neither discloses or analyzes these impacts. CEQA requires that if new construction of housing will occur to accommodate the Project's employees or services expanded, then the EIR must analyze the environmental impacts of that construction. The appropriate components for an adequate analysis include: (1) estimating the amount, location and time frame for growth that may result from the implementation of the Project (e.g., additional housing); (2) considering whether the new population would place additional demands on public services such as fire, police, recreation, emergency, health, childcare or schools; (3) applying impact assessment methodology to determine the significance of secondary or indirect impacts as a result of growth inducement; and (4) identifying mitigation measures or alternatives to address significant secondary or indirect impacts. CEQA Guidelines Appx. G Section XIII(a). The DEIR must be revised to provide this analysis.

E. The DEIR's Analysis of Population, Employment and Housing Impacts is Inadequate.

O-CSN-1.28

PH-3

The DEIR concludes that population, employment and housing impacts of the Plan will be less than significant. (DEIR Appendix B, Initial Study at page 82, DEIR in

reliance on the Initial Study at page I-2). As discussed by Urban Planner Terrell Watt, AICP, this conclusion is untenable and not supported by substantial evidence. Watt explains:

> Instead of providing an adequate analysis of these impacts based on the current Project, the DEIR refers to the discussion of Population and Housing in the Initial Study in reaching its conclusion that impacts will be less than significant. There are many reasons this approach is flawed. First, accurate and consistent existing and projected population, housing and job growth are essential facts to support this conclusion. The Project addressed in the Initial Study and the DEIR are different and therefore the Initial Study cannot adequately analyze the Project as currently proposed. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with both direct and indirect population growth in the area will be less than significant is not supported by analysis, facts or evidence as required. The Project (Plan) clearly will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. The Initial Study states that the Project (Plan) allows up to 56,400 new jobs by 2040 and an increase in population of 23,400. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study. DEIR Appendix B, Initial Study at page 85.[18] Despite this substantial increase in jobs, residents and housing, the Initial Study dismisses impacts as less than significant based on the assertion the growth in within projected growth for the City as a whole and that the Plan itself "would not result in direct physical changes to population or housing." DEIR Appendix B, Initial Study at page 80. This is simply wrong. The Project (Plan) by allowing substantial development in the area including development projects proposed in reliance on the Plan and "that would be allowed under the Plan" will result in changes to the physical environment; changes that must be analyzed in the DEIR. (DEIR at page IV-8 to IV-10). The argument that the Project will result in less than significant impacts because growth is within regional and/or City-wide growth projections is contrary to CEQA's requirement to analyze the significant impacts of a Project against existing conditions (setting) and for the project area. By any measure, the increase in growth as a result of the adoption of the Project is substantial and the numerous impacts associated with substantial new growth of jobs and housing significant as well.
>
> ***
>
> The additional of 25,000 new residents and 63,000 jobs will certainly increase need for a full range of services including schools, day care, police, fire, medical

O-CSN-1.28 (cont'd.)

[18] It is noteworthy these growth assumptions are vastly different than presented in the Central SOMA Plan, DEIR, Financial Analysis and policy papers. See discussion of Growth Inducement in this letter for examples of the vastly different descriptions of growth under the Project.

and more. This increased demand would also further induce businesses to expand and new businesses would crop up to serve the larger population. This would require new employees and draw new residents to the area, who in addition to the direct employment generated by the Project, would also need housing. Neither DEIR nor Initial Study analyze these impacts. In addition, the Project includes Plan objectives implemented through zone changes to favor non-residential development over other kinds of growth and favoring office space and hotels. DEIR at II-13. The result of favoring non-residential over residential development is likely to be an even greater than disclosed jobs housing imbalance. The direct and indirect impacts of this growth must be disclosed and analyzed in a revised and recirculated DEIR.

O-CSN-1.28 (cont'd.)

F. The Plan will have Significant Adverse Open Space Impacts that are not Disclosed or Analyzed in the DEIR.

The DEIR admits that the Plan area suffers from an extreme lack of open space. South Park is the only Rec and Park property in the Plan area. (DEIR, p. II-31). However, the Plan creates almost no new open space area. Worse, it degrades existing open space areas by casting shadows on existing parks and POPOS throughout the Plan area, in violation of the General Plan. (See discussion above). Therefore the DEIR's conclusion that the Plan has no adverse open space impacts is arbitrary and capricious.

O-CSN-1.29

RE-1

The DEIR should be revised to propose specific new open space areas. One prime opportunity for a new open space area is the parking lot located at 350 Second Street. The DEIR should consider other potential open space areas and parks, and also new POPOS throughout the area. This would support the Plan's own Objective, 5.2, "Create new public parks." (DEIR, p. II-31).

The DEIR should also require implantation of the Reduced Height Alternative as a way to reduce shadow impacts on South Park and other public open spaces in the Plan area.

G. The Plan will have Significant Adverse Shadow Impacts that are not Disclosed or Analyzed in the DEIR.

The DEIR erroneously concludes that the Plan does not have significant shadow impacts. (DEIR, p. IV.H-21). This finding ignores the Plan's inconsistency with the General Plan. As discussed above, The Plan is inconsistent with the Recreation and Open Space Element of the General Plan, Policy 1.9: Preserve sunlight in public open spaces. (DEIR, p. III-11). The DEIR admits that the Plan will create new shadow on several parks under the jurisdiction of the Recreation and Park Department, including South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several public open spaces. (DEIR, p. III-11). For example the DEIR admits that the

O-CSN-1.30

SH-2

Plan will create new shadows on the only Rec & Park property in the Plan area, South Park, and "could increase shadow on portions of South Park during early morning and late afternoon hours from the spring equinox to the fall equinox (March through September). (DEIR, p. IV.H-35). In other words, the Plan will cast shadows on South Park for half of the year! Similarly, the DEIR admits that the Plan will cast shadows on the heavily used privately owned public open space (POPOS) located at 303 Second Street from noon "through much of the afternoon," and shading up to one-third of the POPOS. (DEIR p. IV.H-38). O-CSN-1.30 (cont'd.)

Given these conflicts with the General Plan, the DEIR's finding that the Plan has no significant shadow impacts is arbitrary and capricious. The Reduced Height Alternative would reduce this impact and is feasible and would achieve all project goals.

H. The Plan will have Significant Adverse Pedestrian Safety Impacts that are not Disclosed or Analyzed in the DEIR.

The DEIR erroneously concludes that the Plan would have less than significant impacts related to pedestrian safety. (DEIR, p. IV.D-57). This conclusion is arbitrary and capricious and lacks substantial evidence. The Plan would triple the population and number of jobs in the Plan area, adding 25,000 new residents and 63,000 new jobs. This increase alone will increase the number of vehicles and pedestrians in the area, directly increasing the number of conflicts leading to pedestrian safety issues (accidents).

O-CSN-1.31

As a threshold matter, the DEIR fails to analyze the already severe pedestrian safety problem in the area that forms the CEQA baseline. The neighborhood has one of the highest incidences of pedestrian injuries in the City. As DPH stated, "The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8)."[19] Tripling the number of pedestrians and increasing the number of vehicles will clearly increase pedestrian injuries. TR-9

The table on pages IV.D-58-59 of the DEIR clearly shows that the number of pedestrian at certain intersections in the Plan area will increase by as much as 6 times – 600%. For example the number of pedestrians at Fourth and King Streets will increase from a current level of 246 at peak hour to 1680. (DEIR, p. IV.D-58). Several other intersections will see increases in pedestrian traffic ranging from 2 to 7 times. At the same time, the Plan will drastically increase traffic congestion. The DEIR states, "The average delay per vehicle at the study intersections would increase with the addition of vehicle trips associated with development under the Plan… more vehicles

[19] Id. p. 3.

would use Mission, Harrison, Fifth, and Sixth Streets, thereby increasing congestion on these streets." (DEIR, p. IV.D-42). Increasing both pedestrian traffic and vehicle congestion is a recipe for increased pedestrian injuries. The DEIR conclusion to the contrary defies logic and is arbitrary and capricious. (See, SWAPE comment, p. 4-5). As pointed out by SWAPE, pedestrian safety impacts will be much worse than set forth in the DEIR because the document fails to consider all reasonably foreseeable projects, such as Pier 70, and 72 other specific project, all of which will add traffic to the area. Id.

Traffic Engineer Daniel T. Smith, PE, concludes that the Plan will have significant impacts on pedestrian and bicycle safety that are not disclosed or analyzed in the DEIR. Mr. Smith concludes that the Plan will drastically increase vehicle, bicycle and pedestrian traffic in the Plan area. As a direct result, it will increase risks to pedestrian safety. The EIR's conclusion to the contrary is untenable. Mr. Smith states:

> All these hazards clearly increase with the increase of incidence of conflicts, a product of motor vehicle, bike, and pedestrian volumes. These are ultimately a function of the intensity of resident and employment population in the Project area. The DEIR is flat wrong in concluding that increased potential for conflict does not represent a hazard in the study area, especially when the areas of conflict are also areas of undisclosed increases in traffic congestion that intensify the failure to perceive the conflict or induce behavior that results in crashes.
>
> The DEIR is further unreasonable and unsupported in its assertion on page IV.D-41 that street network changes would reduce the potential for conflicts to the extent that it would reduce the incidence of conflict to levels such that would make the traffic hazards of implementation of the plan less than significant. It has conducted no analysis of conflict incidence with and without the Plan Project and with and without the Project's purported roadway improvements. In fact, it has not relied in any way on the statistical records of accidents by location, type, movement pattern, and participant actions and impairments that are readily available to the City[20]. The entire analysis on this topic is inadequate and must be revised and recirculated in draft status. (Smith Comment, pp. 6-7).

O-CSN-1.31 (cont'd.)

I. The Plan will have Significant Adverse Displacement Impacts that are not Disclosed or Analyzed in the DEIR.

O-CSN-1.32

OC-1

The DEIR erroneously concludes that displacement is not an environmental impact under CEQA. (DEIR, p. V-10). As a result, the DEIR does not analyze this impact. As discussed by Urban Planner Terrell Watt, AICP, the Plan is likely to result in

[20] We refer to the Statewide Integrated Traffic Records System (SWITRS) in which the California Highway Patrol receives all traffic reports from all jurisdictions in the state and produces summaries by jurisdiction, by road segment and intersection location, by types of vehicle involved, movements, and causal factors including operator impairments or road deficiencies.

the displacement of large numbers of low and moderate income residents of the Plan area. These residents will be forced to move elsewhere, perhaps replacing short current commutes with long commutes to distant suburbs. This is an environmental impact that must be analyzed under CEQA.

CEQA requires the lead agency to determine whether the "environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly," (PRC § 21083(b)(3), (d)), and to "take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached." See PRC §21000 et seq.

CEQA Guidelines Appendix G, Section XII provides that a project will have significant impacts where it will:

- Induce substantial population growth or concentration of population in an area, either directly (for example, by proposing new housing or businesses), or indirectly (for example, through extension of roads or other infrastructure);
- ***Displace substantial numbers of existing housing*** necessitating the construction of replacement housing elsewhere; or
- ***Displace substantial numbers of people***, necessitating the construction of replacement housing elsewhere. See CEQA Guidelines Appendix G, Section XII.

O-CSN-1.32 (cont'd.)

Therefore, contrary to the DEIR's position, displacement is an environmental impact that must be analyzed under CEQA. See also, See Kalama D. Harris, Attorney General, "Environmental Justice at the Local and Regional Level," May 8, 2012, http://oag.ca.gov/sites/all/files/pdfs/environment/ej_fact_sheet_final_050712.pdf. (Exhibit E).

Here, the Plan is likely to displace numerous residents and commuters who currently live, work, commute, and recreate in the area. These residents will move to other areas, resulting in longer commutes and suburban sprawl. This impact must be analyzed in a revised DEIR. Mitigation measures should be considered, such as requiring additional low income housing.

Urban Planner Terrell Watt, AICP, concludes that the Plan will displace low-income current residents. Watt states:

> The Project will inevitably lead to the displacement of low and moderate income residents because of the incentives provided through zoning and other mechanisms for new non-residential development in the Project area. Currently over 10,000 people live in the Central SOMA neighborhood or Project area in approximately 7800 housing units. These residents are among the most ethically

and economically diverse in the City with about 60% of residents people of color.[21] Although the median household income is slightly higher than the City average, the neighborhood has one of the highest levels of poverty with 31% of the population living at or below 200% of the poverty threshold.[22] Yet, the DEIR concludes that the Project (Plan) would not displace a large number of housing units or necessitate construction of replacement housing outside the Plan area finding this impact less than significant. DEIR Appendix B, Initial Study at page 86. The DEIR reaches this conclusion despite acknowledgement that the Project (Plan) could require the demolition of existing housing units within the Plan Area. The basis of the DEIR's conclusion is in short:

> "From the perspective of the City's housing stock, the loss of housing units as a result of development under the Plan would be offset by the production of up to approximately 13,200 net new housing units (Initial Study page 86) within the Plan area in addition to residential development elsewhere in San Francisco as has been occurring and is expected to occur in the future, in addition to the fees paid for the jobs/housing linkage program and Inclusionary Affordable Housing." DEIR Appendix B, Initial Study at pages 86-87.

O-CSN-1.32 (cont'd.)

The Initial Study contradicts this statement at page 85, noting that the project demand for housing created by the Project would be about 19,900 units, far surpassing the potential addition of about 11,700 units projected to be created in the Plan area by 2040. The current Project is projected to produce fewer housing units – approximately 7,500 -- resulting in an even larger gap between new employees in the Project area and new housing units. There is no question the Project will generate a demand for housing beyond that proposed by the Project. A revised DEIR must acknowledge this impact and provide further evidence housing need will be met and where.

For these reasons the approach the DEIR takes to analysis of this potential impact falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance.

J. The Plan will have Significant Adverse Public Service Impacts that are not Disclosed or Analyzed in the DEIR.

O-CSN-1.33

PS-2

The DEIR concludes that the Plan will not have significant public service impacts on police, fire protection, and other public services. (DEIR, p. S-46). The DEIR states:

[21] SF Dept of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, page 6 (11-30-12).
[22] Id. p. 21

> Development under the Plan and proposed street network changes would not increase the demand for police service or fire protection service such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. (DEIR, p. S-46).

The DEIR relies on the Initial Study for this conclusion. However, as discussed above, the project described in the Initial Study was entirely different from the Plan. It therefore provides no basis for the DEIR's conclusion.

This conclusion defies reason and is arbitrary and capricious. The Plan will triple the resident population if the area, and more than double the number of workers – adding 25,000 permanent residents and 63,000 workers. This is essentially like adding a population the size of a medium suburb to the City. It is preposterous to conclude that these 90,000 new workers and residents will not require any police, fire or other social services.

O-CSN-1.33 (cont'd.)

Urban Planner Terrell Watt explains, that the Plan will have highly significant public service impacts. The Initial Study acknowledges that specific development projects allowed under the Plan and associated increases in population and land use intensity would result in an increased demand for public services noting that the Southern Station (in 2013) receives approximately 25 % of the City's call for service. (Initial Study at page 120). The Central SOMA Neighborhood (Project area) faces "amongst the highest violent and property crime rates in the City[23]. There is no question the addition of over 63,000 new jobs and 23,400 residents will result in significant demand for additional police and fire personnel and likely facilities and equipment. In addition, increased congestion on the Project area roads will likely result in reduced response times unless additional resources are provided in the area (e.g., sub-stations, other). A revised analysis of these impacts must be prepared and recirculated in a new DEIR.

K. The DEIR Fails to Adequately Mitigate Significant Adverse Impacts to Public Transit.

O-CSN-1.34

TR-13

The DEIR admits that:

> Transportation and Circulation, growth pursuant to the Plan would result in Muni ridership that would exceed Muni's capacity utilization standard on one corridor crossing the southeast screenline, as well as on two corridors crossing Plan-specific cordon lines. As described in Chapter II, Project Description, the Plan would also result in transit delay on a number of Muni lines, due to increased congestion. (DEIR, p. III-9).

[23] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

The DEIR admits that the Plan would have significant and unavoidable impacts to public transit, and that "substantial increase in transit demand that would not be accommodated by local transit capacity." (DEIR, p. IV.D-43).

Despite admitting this impact, the DEIR improperly defers mitigation. The DEIR states that "during the design phase, the SFMTA shall review each street network project ... and incorporate feasible street network design modifications." (DEIR, p. IV.D-53). The DEIR also states that the City will "establish fee-based sources of revenue such as parking benefit district," and shall "establish a congestion-charge scheme for downtown San Francisco." (Id.) None of these mitigation measures are defined in the least. There is no way for the public to review the adequacy of these measures. They are classic deferred mitigation that is prohibited under CEQA. (See section above on deferred mitigation).

O-CSN-1.34 (cont'd.)

In addition, the "fee-based" mitigation has been held inadequate under CEQA, unless the specific source of the fee is identified and the specific measures to be funded are set forth in the EIR. The DEIR fails both of these tests. Mitigation fees are not adequate mitigation unless the lead agency can show that the fees will fund a specific mitigation plan that will actually be implemented in its entirety. *Napa Citizens for Honest Gov. v. Bd. Of Supervisors* (2001) 91 CallApp.4th 342 (no evidence that impacts will be mitigated simply by paying a fee); *Anderson First Coal. v. City of Anderson* (2005) 130 Ca.App.4th 1173 (traffic mitigation fee is inadequate because it does not ensure that mitigation measure will actually be implemented); *Kings Co. Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692. But see, *Save Our Peninsula Comm v. Monterey Co.* (2001) 87 Cal.App.4th 99 (mitigation fee allowed when evidence in the record demonstrates that the fee will fund a specific mitigation plan that will actually be implemented in its entirety). *California Native Plant Society v. County of El Dorado et al.* (2009) 170 Cal. App. 4th 1026, held that the fee program had to have gone through CEQA review for an agency to say that the payment of the fee alone is adequate CEQA mitigation.

The DEIR fails to describe any specific mitigation measures to reduce the acknowledged impact to public transit, and fails to specify what measures will be funded. A revised DEIR is required to provide specific mitigation measures to reduce the Plan's transit impacts.

L. The Plan will have Significant Biological Impacts Related to Bird Strikes that are Inadequately Analyzed in the DEIR.

O-CSN-1.35

BI-1

The DEIR concludes that the Plan will not have significant biological impacts. Wildlife biologist, Dr. Shawn Smallwood, Ph.D. concludes that the DEIR's conclusion ignores substantial evidence and that the Plan will have significant impacts on several species. (Smallwood Comment). In particular, placing large number of buildings,

particularly tall buildings, in the Plan area will result in thousands of bird deaths due to building collisions.

First, Dr. Smallwood concludes that the DEIR uses an improper baseline. The Initial Study an DEIR conclude that there will be insignificant impacts because the area is already urbanized. Dr. Smallwood points out that many protected species live in urbanized areas, and will have conflicts with the tall buildings proposed by the Plan. The DEIR ignores these impacts. The Initial Study relies on the California Natural Diversity Database to conclude that many species are not present in the area. Dr. Smallwood points out that the database is only used to confirm the presence of species, not the absence. Dr. Smallwood points out that the eBird database confirms the presence in the area of several protected bird species, including yellow warbler, brown pelican, and California gull, as well as multiple other species protected by the International Migratory Bird Treaty Act. A review of eBird also reveals the use of the area by many species of bird, including additional special-status species such as double-crested cormorant, tricolored blackbird, Peregrine falcon and Cooper's hawk. The eBird records reveal what any biologist should expect of San Francisco, and that is the use of the peninsula as a migration route by many species of bird. Building glazed or glass-facaded high-rises in the middle of this migration route will obviously destroy many migrating birds, and those birds not colliding with the buildings will have to exert extra energy during migration to fly around the buildings. Dr. Smallwood concludes that thousands of birds will be killed by collisions with buildings proposed to be built under the Plan, as well as by house cats owned by residents. These impacts are neither analyzed nor mitigated in the DEIR.

O-CSN-1.35 (cont'd.)

Dr. Smallwood concludes that while the San Francisco bird ordinance is laudatory, it is not sufficient to mitigate the bird-strike impact to less than significant. This impact should be analyzed in a revised DEIR to determine feasible mitigation measures and alternatives. A plainly feasible alternative would be to limit the number of very tall buildings, or to adopt the Reduced Height alternative.

M. DEIR Fails to Adequately Analyze Cumulative Impacts.

The DEIR has a patently inadequate cumulative impact section because it fails to consider the Plan's impacts together with almost 72 other projects that are reasonably foreseeable in the area. Clearly, the Plan's impacts will be much more significant when viewed together with these 72 other projects. SWAPE identifies 72 projects that are not accounted for in the DEIR, including the massive Pier 70 project, which will be in very close proximity to the Plan area (Dogpatch). Failure to analyze these cumulative projects renders the DEIR inadequate. (SWAPE Comment, p. 6-8).

O-CSN-1.36

CU-3

An EIR must discuss significant cumulative impacts. CEQA Guidelines section 15130(a). This requirement flows from CEQA section 21083, which requires a finding that a project may have a significant effect on the environment if "the possible effects of

a project are individually limited but cumulatively considerable. . . . 'Cumulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." **"**Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA Guidelines section 15355(a). "[I]ndividual effects may be changes resulting from a single project or a number of separate projects." CEQA Guidelines section 15355(a).

"The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." *Communities for a Better Environment v. Cal. Resources Agency ("CBE v. CRA")*, (2002) 103 Cal.App.4th 98, 117. A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable probable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b).

O-CSN-1.36 (cont'd.)

As the court stated in *CBE v. CRA,* 103 Cal. App. 4th at 114:

> Cumulative impact analysis is necessary because the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.

(Citations omitted).

In *Friends of Eel River v. Sonoma County Water Agency,* (2003) 108 Cal. App. 4th 859, the court recently held that the EIR for a project that would divert water from the Eel River had to consider the cumulative impacts of the project together with other past, present and reasonably foreseeable future projects that also divert water from the same river system. The court held that the EIR even had to disclose and analyze projects that were merely proposed, but not yet approved. The court stated, CEQA requires "the Agency to consider 'past, present, and probable future projects producing related or cumulative impacts . . . .' (Guidelines, § 15130, subd. (b)(1)(A).) The Agency must interpret this requirement in such a way as to 'afford the fullest possible protection of the environment.'" *Id.*, at 867, 869. The court held that the failure of the EIR to analyze the impacts of the project together with other proposed projects rendered the

document invalid. "The absence of this analysis makes the EIR an inadequate informational document." *Id.,* at 872.

O-CSN-1.36 (cont'd.)

A revised DEIR is required to consider the impacts of the Plan together with other reasonably foreseeable projects, including Pier 70.

VIII. THE DEIR ALTERNATIVES ANALYSIS IS LEGALLY DEFICIENT.

The DEIR's alternatives analysis is legally deficient because it fails to acknowledge that the Reduced Height Alternative is the environmentally superior alternative. The Reduced Height Alternative would reduce almost all of the Plan's significant impacts, while still achieving all of the Plan's objectives. It is therefore the environmentally superior alternative.

An EIR must describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. "An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making." (*Laurel Heights I*, 47 Cal.3d at 404.) An EIR must also include "detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Id*. at 405.)

O-CSN-1.37

One of CEQA's fundamental requirements is that the DEIR must identify the "environmentally superior alternative," and require implementation of that alternative unless it is infeasible. (14 Cal.Code Regs. §1526.6(e)(2); Kostka & Zischke, *Practice Under the California Environmental Quality Act* §15.37 (Cont. Educ. Of the Bar, 2008).) Typically, a DEIR identifies the environmentally superior alternative, which is analyzed in detail, while other project alternatives receive more cursory review.

AL-2

The analysis of project alternatives must contain an accurate quantitative assessment of the impacts of the alternatives. In *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733-735, the court found the EIR's discussion of a natural gas alternative to a coal-fired power plant project to be inadequate because it lacked necessary "quantitative, comparative analysis" of air emissions and water use.

A "feasible" alternative is one that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (Pub. Res. Code § 21061.1; 14 Cal. Code Regs. § 15364.) California courts provide guidance on how to apply these factors in determining whether an alternative or mitigation measure is economically feasible.

The lead agency is required to select the environmentally preferable alternative unless it is infeasible. As explained by the Supreme Court, an environmentally superior alternative may not be rejected simply because it is more expensive or less profitable:

> The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.

(*Citizens of Goleta Valley v. Bd. of Supervisors* (1988) 197 Cal.App.3d 1167, 1180-81; *see also*, *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322 (county's approval of 80 unit hotel over smaller 64 unit alternative was not supported by substantial evidence).)

The expert consultants at SWAPE conclude that the Reduced Heights Alternative is environmentally superior in that it reduces almost all of the Plan's significant impacts while still achieving all project goals. (SWAPE Comment, pp. 9-10). SWAPE includes a chart of impacts:

O-CSN-1.37 (cont'd.)

A summary of the impacts and percent reduction (if applicable) the Alternative would result in are provided in the table below.

Reduced Heights Alternative Impact Reductions	
Impact	**Percent Reduction from Proposed Plan**
Transit Ridership	*(8%)*
Pedestrian and Bicycle Operations	*(8%)*
Pedestrian Crowding in Crosswalks	*Significantly Reduced*
Bicycle Travel	*Significantly Reduced*
Demand for Off-Street Freight Loading Spaces	*Significantly Reduced*
On-Street Commercial Loading Spaces	*Significantly Reduced*
Curb Space for Passenger Loading/Unloading Zones	*Significantly Reduced*
Parking Demand	*(10%)*
Construction Activities	*Significantly Reduced*
Emissions of Criteria Air Pollutants, Greenhouse Gases (GHGs), and Traffic-Generated Toxic Air Contaminants (TACs)	*Significantly Reduced*

We have prepared the analysis below showing that the Reduced Heights Alternative is environmentally superior to all other alternatives. The chart relies on the DEIR's own conclusions for each impact.

DEIR: S-55		CENTRAL SOMA	NO PROJECT ALT by 2040	REDUCED HEIGHT	MODIFIED TODCO	LANDUSE VAR Excludes Residential Uses	LANDUSE ONLY Excludes street network

O-CSN-1.37 (cont'd.)

							changes
JOBS + HOUSING	HOUSEHOLDS	14,400	9,200	12,400	12,700	12,900	14,400
	RESIDENTS	25,500	16,300				25,500
	JOBS	63,600	27,200	55,800	56,700	66,200	63,600
	TOTAL FLOOR AREA	31.7M SqFt	17.7M SqFt	27.6M SqFt	28.2M SqFt	30.5M SqFt	31.7M SqFt
GOALS	ABILITY TO MEET OBJECTIVES	ALL	SOME	MOST	MOST	MOST	MOST
LAND USE	PHYSICAL DIV OF COMMUNITY	LTS	=	=	=	=	=
	LAND USE CONFLICT	SUM	<	=	=	=	<
	CUM. LAND USE CONFLICT	SUM	<	=	=	=	<
AESTHETICS	VISUAL CHARACTER	LTS	<	=	=	=	=
	VIEWS / VISTAS	LTS	<	=	=	=	=
	LIGHT / GLARE	LTS	<	=	=	=	=
	CUM. AESTHETICS	LTS	<	=	=	=	=
CULTURAL	HISTORICAL RESOURCES	SUM	<	=	<	=	=
	HISTORICAL RESOURCES	LTS	NI	=	<	=	<
	HISTORICAL RESOURCES	LTSM	<	=	=	=	=
	ARCHEOLOGICAL RESOURCES	LTSM	<	=	=	=	=
	TRIBAL CULTURAL RESOURCES	LTSM	<	=	=	=	=
	PALEONTOLOGICAL RESOURCES	LTS	<	=	=	=	=
	HUMAN REMAINS	LTS	<	=	=	=	=
	CUM. HISTORICAL RESOURCES	SUM	<	=	=	=	=
	CUM. HISTORICAL RESOURCES	LTS	NI	=	<	=	<
	CUM. ARCH. RESOURCES	LTSM	<	=	=	=	=
	CUM. PALEONTOLOGICAL RES	LTS	<	=	=	=	=

O-CSN-1.37 (cont'd.)

TRANSPORTATION + CIRCULATION	VMT	LTS	<	<	<	=	>
	TRAFFIC HAZZARDS	LTS	<	<	<	=	>
	TRANSIT	SUM	<	<	<	=	=
	PEDESTRIANS	SUM	<	<	<	=	=
	BICYCLISTS	LTS	>	=	=	=	>
	LOADING	SUM	<	<	=	=	=
	PARKING	LTS	<	<	<	=	=
	EVERGENCY VEHICLE ACCESS	LTSM	<	<	<	=	<
	CONSTRUCTION	SUM	<	<	<	=	<
	CUM. VMT	LTS	<	<	<	=	>
	CUM. TRAFFIC HAZZARD	LTS	<	<	<	=	>
	CUM. TRANSIT	SUM	<	<	<	=	=
	CUM. PEDESTRIANS	SUM	<	<	<	=	=
	CUM. BICYCLISTS	LTS	>	=	=	=	>
	CUM. LOADING	SUM	<	<	<	=	=
	CUM. PARKING	LTS	<	<	<	=	=
	CUM. EMERGENCY VEH. ACCESS	LTSM	<	<	<	=	<
	CUM. CONSTRUCTION	LTS	<	<	<	=	<
NOISE + VIBRATION	TRAFFIC NOISE	SUM	<	<	<	=	<
	CONSTRUCTION NOISE	SUM	<	<	<	<	=
	CONSTRUCTION VIBRATION	LTSM	<	<	<	<	=
	CUM TRAFFIC NOISE	SUM	<	<	<	<	<
AIR QUALITY	CONFLICT WITH CLEAN AIR PLAN	LTS	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (PLAN)	LTS	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (DEV)	SUM	<	<	<	<	=
	CRITERIA AIR POLLUTANTS (CONSTR)	LTSM	<	<	<	<	=
	PM2.5 + TACS (OPERATIONA	SUM	<	<	<	<	=

O-CSN-1.37 (cont'd.)

	L)						
	PM2.5 + TACS (CONSTRUCTION)	LTSM	<	<	<	<	=
	ODORS	LTS	<	=	=	=	=
	CUM. CRITERIA AIR POLLUTANTS	SUM	<	<	<	<	=
	CUM. PM2.5 + TACS	SUM	<	<	<	<	=
WIND	WIND	SUM	<	<	<	=	=
	CUM. WIND	LTS	<	<	<	=	=
SHADOW	SHADOW	LTS	<	<	=	=	=
	CUM. SHADOW	LTS	<	<	<	=	=
HYDROLOGY + WATER QUALITY	FLOODING	LTS	=	=	=	=	=
	CUM. WASTEWATER	LTS	=	=	=	=	=
	CUM. FLOODING	LTS	=	=	=	=	=

Since the Reduced Heights Alternative reduces most Project impacts, while achieving almost all Project goals, the DEIR is arbitrary and capricious for failing to identify the Reduced Heights Alternative as environmentally superior.

IX. A REVISED DRAFT EIR MUST BE PREPARED AND RECIRCULATED FOR PUBLIC COMMENT.

Recirculation of an EIR prior to certification is required "when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (cf. Guidelines, § 15162, subd. (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (cf. Guidelines, § 15162, subd. (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt (cf. Guidelines, § 15162, subd. (a)(3)(B)(3), (4)); or (4) ***that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless***." *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal. 4th 1112, 1130, citing *Mountain Lion Coalition v. Fish & Game Comm'n* (1989) 214 Cal.App.3d 1043.

O-CSN-1.38

GC-5

The DEIR is so fundamentally and basically inadequate, that recirculation of a new draft EIR will be required to allow the public to meaningfully review and comment on the proposed project.

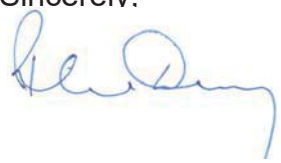
X. CONCLUSION.

The DEIR is woefully inadequate. A revised and recirculated draft EIR will be required to remedy the myriad defects in the document. The revised draft EIR should identify the Reduced Height (Mid-Rise) Alternative as the environmentally superior alternative, and consider it on equal footing to the Plan, as was done in the Central Corridor Plan. The City should also consider an alternative that limits building height to no more than 130 feet in the block bounded by I-80 and Folsom, and Second and Third Streets, and places a park at the current parking lot located at 350 Second Street. This modification will make the Plan much more consistent with the goals to limit tall buildings to the area near CalTrain and BART, while maintaining the mid-rise character of the rest of the neighborhood, and increasing much needed open space.

O-CSN-1.39

AL-3

Sincerely,



Richard Toshiyuki Drury
LOZEAU | DRURY LLP
Counsel for Central SoMa Neighbors and SFBlu

EXHIBIT A

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February 13, 2017

Richard Drury
Lozeau Drury, LLP
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RE: Comments on Draft Environmental Impact Report for Proposed Central SOMA Plan, State Clearinghouse No. 2013042070

Dear Mr. Drury,

At your request, I have reviewed the Draft Environmental Impact Report ("DEIR") for the Proposed Central SOMA Plan ("Project" or "Plan").[1] My review focused on the DEIR's treatment of:

- Population, Employment and Housing
- Growth Inducement
- Shadows
- Open Space, Parks and Recreation
- Public Services
- Plan/Policy Consistency

In preparing these comments, I have reviewed the following information:

1. Draft Environmental Impact Report for the Central Soma Plan
2. Draft Environmental Impact Report Appendices
3. Draft Central SOMA Plan and Policy Papers
4. Financial Analysis of San Francisco's Central SOMA Plan

After carefully reviewing the DEIR for the Project including its Appendices, proposed Central SOMA Plan, and relevant policy papers, and Financial Analysis, I have concluded the DEIR fails in numerous respects to comply with CEQA and to fulfill CEQA's fundamental mandate. As

O-CSN-1.40
GC-5

[1] See Appendix A for Watt Qualifications

described below, the DEIR violates this law because it fails to analyze adequately the significant environmental impacts of the Project or propose sufficient mitigation measures in the form of Plan policies, provisions and land use designations to address those impacts. Where, as here, the EIR fails to fully and accurately inform decision-makers and the public of the environmental consequences of proposed actions, it does not satisfy the basic goals of the statute. Because of the DEIR's numerous and serious inadequacies, the City of San Francisco must revise and recirculate the document to permit an adequate understanding of the environmental issues and potential solutions (mitigation and alternatives). Consideration should also be given to preparing a revised NOP and Initial Study prior to a revised DEIR because the 2014 Initial Study is patently inadequate and describes a completely different project from the Plan set forth in the DEIR.

O-CSN-1.40 (cont'd.)

I. Context and Introduction

The Project (Plan) is described in many different documents and in each differently. Thus, it is difficult to fully understand the Project and impossible for the DEIR to adequately analyze the Project. Making it even more challenging to get a clear understanding of the Project are the numerous plan provisions that provide flexibility for future development of the Project Area such as transfer of development rights and state density bonus law as well as other considerations that could allow more development in the Area than reflected in the Project description or impact discussions. For these and other reasons below, there is no complete, stable and finite description of the Project (Plan) to guide the DEIR's analysis of impacts.

O-CSN-1.41

PD-6

What is clear, despite the vastly different and changing Project descriptions throughout the Project record, is that the Project is expected to bring up to 63,600 jobs and up to 7,500 housing units to the Central SOMA Neighborhood over the next 25 years, doubling the employment population and tripling the resident population.[2] What is clear, is the Project will seriously exacerbate the Project area's and City's severe jobs-housing imbalance; an imbalance made worse by the fact that San Francisco now serves as a "bedroom community" for the Peninsula cities and San Jose.[3] What is clear is the Project's myriad community benefits are not certain and even if certain, will not offset the impacts of the Project. What is also clear is that the Project calls for extending the Financial District type High Rise development to the neighborhood -- not limited just to the sites adjacent to transit centers and hubs – resulting in significant impacts including traffic congestion, shadows, declining air quality and displacement,

O-CSN-1.42

PM-4

[2] Assuming population figures provided in the DEIR, the Project would triple the resident population of 12,000 to 37,500; possibly quadruple as resident population may be closer to 10,000. The Project would more than double the employment in the area from a current level of approximately 45,600 jobs to 109,200 jobs. DEIR at page IV-6 and IV-5.

[3] Between 2000 and 20016, San Francisco reportedly added 88,000 new jobs and only 37,000 new housing units, many of which were not suited for families or accessible to the local workforce due to high prices and rents. Mayor's Office of Housing. During the same period, San Francisco has experienced an increase in high wage residents who commute daily to the Peninsula cities and Silicon Valley, furthering increasing the gap in San Francisco housing available to the local workforce.

among other impacts. Many of Project's stated goals[4] and anticipated results[5] are laudatory. However, the Project lacks the necessary policies, provisions and land use and designations to ensure those goals and results are in fact the outcome of adoption of the Project.[6]

At stake is one of the most diverse and vital neighborhoods in San Francisco. It is at the Area Plan stage that CEQA requirements fulfilled correctly can have the best result. Deferring further analysis and mitigation to project by project evaluation simply does not work for issues such as Plan Consistency, Population and Housing and Public Services, where it is at the planning stage appropriate and feasible mitigation must be made certain.

O-CSN-1.42 (cont'd.)

The DEIR's flaws are described in detail below. It is important to note here that the Project (Area Plan) is also flawed. As described the Plan as proposed departs from clear City policy, and although this Plan will guide development for 25 years until 2040, it fails to recognize rapidly changing times or present policy direction to deal with changes.[7] Examples of omissions in the Plan include but are not limited to the rapid increase in UBER, LYFT and other ride sharing services that have swamped our roads and provided an alternative to transit, the loss of families due to spiraling costs of housing and competition from high wage sectors, rapid increase in high wage jobs displacing existing jobs but also creating demand for services including a dramatic rise in delivery services and related fulfillment centers. In addition, the Plan does not take into consideration leading edge substantive policy solutions emerging from City Hall such as a required mix of housing units with a fixed minimum percent family "sized." Within the plans 25-year horizon, the City will also see self-driving cars and other vehicles. Some of these changes – including the advent of self-driving cars – could accelerate the reduction in land needed for vehicles and parking. These are but a few of the changes that have been occurring and are accelerating that must be addressed in the Area Plan. The City should pause both to revise the DEIR and to re-engage the public and experts and get this plan right.

II. The Project Violates the California Environmental Quality Act

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[4] increase capacity for jobs and housing, maintain diversity of residents, prioritize walking, biking and transit, offer abundance of parks and recreational opportunities, preserve the neighborhoods cultural heritage, ensure new buildings enhance the character of the neighborhood. Central SOMA Plan at page 6.

[5] 33 percent of total units produced after the Plan adoption are affordable, no net loss of PDR, space for services, cultural preservation, etc. Central SOMA Plan at page 7.

[6] Such as reducing heights except adjacent to major transit hubs, certainty for production of affordable housing in the neighborhood prior to, or concurrent with job growth (policy link for certain number of housing units before jobs), certainty for more than one significant new park, emergency access improvements in place rather than deferred to a future street design, and the like.

[7] For example, substantive policy changes by the Board of Supervisors are taking aim at ensuring the City is for all families – "Family Friendly SF." Between 2005 and 2015, 61 percent of the 23,200 new units of market rate housing were studios and one bedrooms. SF Planning Department. The proposed Central SOMA Plan does not include policies with a required unit mix. A revised Plan that will purportedly guide growth until 2040 should start out being leading edge and a family friendly goal and implementing policies would be an essential component of that revised Plan.

A. The DEIR Provides an Incomplete and Inconsistent Description of the Project and the Project Setting (Baseline)

A fundamental requirement of CEQA is that an EIR contain an accurate and complete project description. Without a complete project description, an agency and the public cannot be assured that all the project's environmental impacts have been revealed and mitigated. Further, CEQA and the CEQA Guidelines mandate that an EIR include a description of the "physical environmental conditions . . . from both a local and a regional perspective. . . Knowledge of the regional setting is critical to the assessment of environmental impacts." CEQA Guidelines Section 15125(a) and (c). This requirement derives from the principle that without an adequate description of the project's local and regional context, the EIR – and thus the decision-makers, agencies and public who rely on the EIR – cannot accurately assess the potentially significant impacts of the proposed Project.

The Project in this case is the Central SOMA Plan (formerly the Central Corridor Plan), which purports to be a comprehensive plan for the area including important local and regional transit lines and hubs connecting Central SOMA to adjacent neighborhoods including Downtown, Mission Bay, Rincon Hill, Mission District as well as the broader region via freeways and the light rail that will link to the Caltrain Depot. The Plan's goals are laudatory including Central SOMA becoming a sustainable neighborhood, accommodating anticipated population and job growth, providing public benefits including parks and recreation, respecting and enhancing neighborhood character, preserving the neighborhoods cultural heritage, and maintaining the diversity of residents. DEIR at page S-1 and Goals S-2. Unfortunately, the Projects approach to achieving these goals -- including but not limited to emphasizing office uses, increasing heights throughout the neighborhood, and removing restrictions in the current Central Corridor Plan, accepting in-lieu and community benefits fees instead of requiring new parks, affordable housing and essential services and infrastructure be provided in the Plan Area concurrent with or prior to non-residential and market rate development -- will result in significant impacts to the Central SOMA Neighborhood and take the community farther from these goals.

O-CSN-1.43

PD-6

1. Incomplete and Inconsistent Project Description

CEQA requires an EIR to be based on an accurate, stable and finite project description: "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles* (1977), 71 Cal.App.3d 185. The DEIR lacks a complete and consistent description of the Project in numerous respects.

First, the DEIR relies on the Initial Study for the analysis of 11 environmental topics even though the DEIR and Initial Study contain two distinctly different descriptions of the Project. The Initial Study was published on February 12, 2014 (Appendix B to the DEIR). According to the DEIR, based on the Initial Study, the Project (Plan) could not result in significant environmental impacts for the following topics:

- Population and Housing
- Greenhouse Gas Emissions
- Recreation
- Utilities and Service Systems (except for wastewater treatment and storm drainage addressed in the DEIR)
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality (except for sewer system operations and sea level rise addressed in the DEIR)
- Hazardous Materials
- Mineral and Energy Resources
- Agricultural Resources

O-CSN-1.43 (cont'd.)

See DEIR at page I-2. Based on the Initial Study, the DEIR provides no further substantive analysis of these impacts despite significant changes to the Project (Plan) summarized below.

The DEIR explains:

> "Because the Initial Study analysis was based on a previous draft of the Plan circulated for review in 2013, the current 2016 draft of the Plan has been reviewed to ensure the Initial Study's conclusions reached on the 2013 draft remain valid. No new information related to the draft 2016 Plan has come to light that would necessitate changing any of the Initial Study's significance conclusions reached for the 11 topics that would be less than significant or less than significant with mitigation measures, which are included in the topical sections of Chapter IV, Environmental Setting, Impacts and Mitigation Measures, of this EIR. **As such, no further environmental analysis of these Initial Study topics is required in this EIR." [emphasis added].**

This approach is fatally flawed since the 2014 Initial Study does not describe the current proposed Project (Plan) that is the subject of the DEIR. In addition to completely different project boundaries,[8] the Initial Study describes an entirely different project with respect to baseline (setting) than the current Project (Plan), and Project in terms of growth, employment and housing. Baseline data in the Initial Study is woefully out of date with respect to population and housing, traffic, air pollution as well as regional conditions. Also, the project described in the Initial Study has very different project goals. The Initial Study project has five goals:

1. Support transit-oriented growth, particularly workplace growth, in the Central Soma area.

[8] The Initial Study describes a rectangular project area that extends from Market Street to Townsend and from Second Street to Sixth Street. The Central SOMA Plan and DEIR exclude about 11 square blocks and therefore completely different assumptions concerning growth and development, among other fundamental differences in Project description.

2. Shape the Central SoMa's urban form recognizing both City and neighborhood contexts.
3. Maintain the Central SoMa's vibrant economic and physical diversity.
4. Support growth with improved streets, additional open space, and other elements of "complete communities."
5. Create a model of sustainable growth.

By contrast, the DEIR Project has eight goals:

1. Increase the Capacity for Jobs and Housing
2. Maintain the Diversity of Residents
3. Facilitate an Economically Diversified and Lively Jobs Center
4. Provide Safe and Convenient Transportation that Prioritizes Walking, Bicycling and Transit
5. Offer an Abundance of Parks and Recreational Opportunities
6. Create an Environmentally Sustainable and Resilient Neighborhood
7. Preserve and Celebrate the Neighborhood's Cultural Heritage
8. Ensure that New Buildings Enhance the Character of the Neighborhood and the City

O-CSN-1.43 (cont'd.)

The Project's described respectively in the Initial Study and DEIR are entirely different given that the basic project goals are plainly different in respects that implicate substantively different physical and policy objectives.

Second and compounding the situation is that almost no two descriptions of the Project are the same in the documents in the Project record (e.g., Central SOMA Plan, DEIR, Initial Study, Policy Papers, Financial Analysis). Topical sections of the DEIR thus are based on inconsistent descriptions of the Project. Examples include, but are not limited to, the growth assumptions that are essential to accurately analyzing Project impacts across all environmental topics. Growth assumptions in the DEIR, Initial Study, Central SOMA Plan and Financial Analysis are vastly different:

> Table IV-1 [DEIR], Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ("buildout year" or "planning horizon"). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. DEIR at page IV-5.
>
> Growth projected in the Initial Study includes up to 13,200 housing units (IS at page 85) and 56,400 new jobs (IS at page 81). In contrast, the Central SOMA Plan states: "With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing."

Central SOMA Plan at page 7. The Financial Analysis of San Francisco's Central Soma Plan[9] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: "The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years."

Different growth assumptions are but one example of vastly different Project description information throughout the DEIR record. A revised DEIR must be completed with topical discussions based on a complete, finite and stable description of the Project. Ideally, the revised DEIR would be preceded by a revised NOP and Initial Study so that all descriptions of the Project in the record are the same.

O-CSN-1.43 (cont'd.)

Finally, the Project Description section of the DEIR is incomplete and lacks details critical to supporting adequate impact analyses including but not limited to information about the type of housing and jobs the Project will allow. To compensate for the lack of detail, some topical discussions essentially create Project description details to support analysis. Examples include the spatial representation of growth in the Shadow analysis, TAZ detail in the Transportation section and the prototypical development projects invented in the Financial Analysis. These more detailed topical representations of the Project also vary from one another. A revised DEIR with a complete description of the Project is essential to support revised topical analyses. The revised Project description should also describe in detail the policy and financial (community benefits) proposals in the Plan that the DEIR and Initial Study rely on to reach conclusions concerning impact significance. For example, the DEIR and Initial Study conclude that impacts associated with displacement of units and households will be less than significant based on a suite of affordable housing programs that purportedly will offset what otherwise would be a significant impact. (e.g., Project Area tailored fees, offset requirements, among others included in the proposed community benefits program for the Project and in the Plan). These are not described in the Project description, nor is there any analysis to demonstrate exactly how these programs and fees will result in mitigating Project impacts associated with growth inducement and jobs-housing imbalance, among other significant impacts of the Project.

2. The DEIR Includes an Inadequate Baseline

O-CSN-1.44

GC-2

The DEIR fails to adequately describe baseline conditions in the Plan Area, including information about the Project area and regional setting. Setting or environmental baseline information is as essential to adequately disclosing and analyzing project-related and cumulative impacts as a complete and consistent Project description. Without adequate and complete information

[9] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

about the setting, it is not possible to determine whether the Project improves or makes worse existing environmental conditions.

Examples of regional baseline setting information that is missing from the DEIR includes but is not limited to the following.

a. Affordable, Workforce and Family Friendly Housing

The DEIR must analyze the potential for the Project to displace existing housing, create demand for additional housing and displace people requiring construction of replacement housing elsewhere. To perform this analysis, it is essential the DEIR include in the description of the Project baseline (setting) details concerning existing affordable units, including deed restricted housing, family housing, senior housing and housing affordable to the workforce[10] in the Project area. Information concerning affordable housing in the Project area is incomplete, consisting only of the following:

> "The Plan area contains approximately 7,800 residential units, approximately 6,800 households, and a population of approximately 12,000 people, according to Planning Department data. This accounts for just two percent of the City's total number of households. According to the Plan, South of Market and the Plan area in particular, are home to a large amount of deed restricted affordable housing; about 15 percent of the housing is deed-restricted for low income residents, compared to 4.5 percent citywide." DEIR Appendix B, Initial Study at page 78.

O-CSN-1.44 (cont'd.)

Without current and complete information about the existing housing stock in the Project Area, the DEIR cannot adequately analyze the Project's impact on affordable, workforce, senior and family friendly housing and households and conclusions concerning the significance of Project-related and cumulative impacts cannot be supported by facts and evidence. The DEIR must be revised to include this and other baseline information.

b. Existing Jobs-Housing Balance and Fit with the Project Area, City and Region

The DEIR must analyze the potential for the Project to make worse the existing imbalance of jobs and housing in the Project area as well as the City and region. Finding the right jobs-housing balance has long been an important concern for urban planners and an important policy consideration for general and area plans. More recently, attention has turned to jobs-housing fit – the extent to which housing price and rent is well matched to local job salary and quality. Both the Initial Study and DEIR are silent on the matter of jobs housing fit and fail to adequately address the issue of jobs housing balance. The DEIR should be revised to describe the existing job-housing balance and fit for the Project area, adjacent planning areas, the City

[10] Workforce housing is housing at the lower end of market rate serving households with up to 200% of median income and often referred to as the "missing middle" or gap in affordable housing in San Francisco. Voters recently approved funding to build more housing, including for the SF workforce.

and region. Updated baseline information must include a description of changes in demand for housing in San Francisco due to the choice by Peninsula and Silicon Valley employees to reside in San Francisco and relevant to the DEIR's analysis, how this change is increasing housing costs, increasing competitive for scarce housing stock and displacing existing residents. This information is not only necessary to adequately analyze environmental topics such as displacement and Project demand for new housing, but it is also essential to determining the extent to which the Project will increase commuting, traffic and vehicle miles traveled. Therefore, without this information, the full impacts associated with air quality and greenhouse gas emissions, among other impacts cannot be adequately analyzed and conclusions concerning the significance of Project-relation and cumulative impacts cannot be supported by facts and evidence. The DEIR must be revised to include this and other baseline information.

O-CSN-1.44 (cont'd.)

c. Public Services

The DEIR must analyze the Project's impacts on a wide array of essential public services, including but not limited to fire, police, emergency, health-care, child-care as well as schools. Neither the DEIR nor the Initial Study contain the information needed to support an adequate analysis of the Project's impacts to public services. Information about public services is out of date and incomplete. For example, the scant information on police and fire services dates back to 2012 and 2013, and lacks any information about the City's service standards, existing capacity and unmet needs. See DEIR Appendix B, Initial Study at pages 118 and 119. A great deal has changed in a very few years since the incomplete baseline information on services was presented in the Initial Study due to rapid growth in the City post-recession that has not been accounted for in the Initial Study setting information concerning services. The DEIR must be revised to include this and other baseline information. Without this information, adequate analysis of the Project's impacts is impossible and conclusions concerning impact significance cannot be supported by facts and evidence.

B. The DEIR's Analysis of, and Mitigation for, the Impacts of the Project Are Inadequate

O-CSN-1.45

GC-5

The discussion of a project's environmental impacts is at the core of an EIR. See CEQA Guidelines Section 15126(a). As explained below, the DEIR's analysis of the Project's environmental impacts are deficient under CEQA because the DEIR fails to provide the necessary facts and analysis to allow the City and the public to make informed decisions about the Project, mitigation measures and alternatives. An EIR must contain facts and analysis, not just bare conclusions. A conclusion regarding the significance of an environmental impact that is not based on analysis of the relevant facts fails to fulfill CEQA's information mandate.

Additionally, an EIR must identify feasible mitigation measures to mitigate significant environmental impacts. CEQA Guidelines Section 15126.4. Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation

measures available which would substantially lessen the significant environmental effects of such projects. . . .” Pub. Res. Code Section 21002.

O-CSN-1.45 (cont'd.)

As explained below, the DEIR fails to provide decision-makers and the public with detailed, accurate information about the full breadth of the Project’s potentially significant impacts with respect to growth inducement, population and housing, shadows, parks and recreation, public services and plan consistency. The DEIR’s cumulative analysis of these impacts is also deficient. Where the DEIR fails to adequately analyze the Project-related impacts, the cumulative analysis cannot be adequate. Further, the DEIR does not identify and analyze feasible mitigation measures that would reduce or avoid such impacts.

1. The DEIR’s Analysis of the Project’s Growth-Inducing Impacts is Flawed

CEQA requires that an EIR include a detailed statement setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code Section 21100(b)(5). A proposed project is either directly or indirectly growth inducing if it: (1) fosters economic or population growth or requires additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. CEQA Guidelines Section 15126.2(d). While growth inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., displacement of households, demand for additional housing and services, traffic, air pollution, etc.) may be significant and adverse. In such cases, the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project. The analysis required is similar in some respects to the analysis required to analyze impacts associated with population and housing.

O-CSN-1.46

OC-3

The DEIR contains a discussion of Growth Inducement at Section V.D. The discussion acknowledges the proposed zoning changes under the Project would expand the Plan Area’s capacity for growth through a planning horizon year of 2040, during which time up to an additional 14,500 residential units and up to an additional 63,600 jobs could be accommodated in the Plan Area.[11] The discussion provides no analysis of the Project’s potential to induce growth in accordance with CEQA, nor does the discussion reach any conclusions as to the significance of growth inducing impacts instead relying on the assertion that the growth allowed by the Project is simply an accommodation of growth projected for the region.[12]

The DEIR presents growth assumptions at page IV-5 as follows:

[11] Growth directly allowed by the Project is equivalent in scale to a new town, small suburb or city. Under no reasonable interpretation could the growth proposed by the Project be considered insignificant and therefore, by extension, the impacts of that growth – on services, housing demand, air quality, etc. -- are also significant.

[12] It goes without saying that even if the growth reflects projected growth for the region, that growth had the potential to significantly impact the Project area; impacts not adequately considered or analyzed in the regional plans and accompanying environmental documents.

"Citywide growth forecasts prepared by the Planning Department are part of the basis of the analysis in this EIR. The Department regularly updates citywide growth forecasts that are based on Association of Bay Area Governments' (ABAG) regional projections of housing and employment growth. The Department allocates the regional growth forecasts to 981 Traffic Analysis Zones (TAZs) in San Francisco by first accounting for in-city growth that is already anticipated (both individual projects and planning efforts) in the so-called development pipeline, subtracting pipeline growth from the City's share of the regionally forecast growth, and allocating the residual amount of ABAG-forecast growth on the basis of weighting factors developed from analysis of both development capacity and existing development. **To establish baseline numbers for the Plan, the Planning Department relied on a 2010 Dun & Bradstreet database for employment numbers and the 2010 Census and the Department's Land Use Database for existing housing units. It is noted that the growth forecasts for the No Project condition (2040 Baseline) and for the Plan differ somewhat from those shown in the Initial Study due to modifications to the Plan since the Initial Study was published.** Footnote 60**.**

O-CSN-1.46 (cont'd.)

Table IV-1, Summary of Growth Projections, presents the population and employment growth assumed in the Plan Area between 2010 (the base year for the analysis) and 2040 ("buildout year" or "planning horizon"). This growth amounts to approximately 14,400 additional households, approximately 25,500 additional residents and about 63,600 additional jobs under the Plan. It is noted that a certain amount of development and growth in the Plan Area would be expected to occur even without implementation of the Plan. In many cases, existing development does not reach its full potential under current building height limits, and those parcels could be developed regardless of future changes in land use policies and zoning controls. Development that could occur without project implementation is shown in the table below under the No Project scenario." DEIR at page IV-5.

Footnote 60 explains: "Since publication of the Initial Study, Plan development assumptions have been modified to add development capacity to a portion of the block bounded by Bryant, Fifth, Brannan, and Sixth Streets (location of the San Francisco Flower Mart) and allow for approximately 430 units of affordable housing at Fifth and Howard Streets. In addition, development forecasts were adjusted to move the approved 5M Project and the under-construction Moscone Center Expansion from Plan-induced growth to cumulative growth. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study."
[DEIR at page IV-5]

Vastly different growth assumptions are presented elsewhere in the Central SOMA Plan, DEIR, Appendices and Policy Papers. For example, the Central SOMA Plan states: "With adoption of the Central SOMA Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The Plan therefore represents an increase in development capacity of 450 percent for jobs and 300 percent for housing." Central SOMA Plan at page 7.

The Financial Analysis of San Francisco's Central Soma Plan[13] (December 2016) is based on different growth assumptions than presented in DEIR, Initial Study and Plan: "The vision of the Central Soma Plan is to create a sustainable and vital neighborhood in the area immediately surrounding the Central Subway (expected to open in 2019) in San Francisco's South of Market District. The Plan is projected to bring 40,000 jobs and 7,500 housing units to the area over the next 25 years."

The is no question the Project will generate substantial growth in the Central SOMA neighborhood; more than an increase of 450 percent for jobs and at least 300 percent for housing. Due to the Project's high employment to housing ratio, regardless of which jobs growth assumption is used, the Project will result in additional demand for housing in the Project area or beyond. In addition, substantial new non-residential and residential growth will require additional public services, likely including expansion and therefore construction of facilities in the neighborhood or adjacent neighborhoods of a myriad of services. Yet the DEIR neither discloses or analyzes these impacts. CEQA requires that if new construction of housing will occur to accommodate the Project's employees or services expanded, then the EIR must analyze the environmental impacts of that construction. The appropriate components for an adequate analysis include: (1) estimating the amount, location and time frame for growth that may result from the implementation of the Project (e.g., additional housing); (2) considering whether the new population would place additional demands on public services such as fire, police, recreation, emergency, health, childcare or schools; (3) applying impact assessment methodology to determine the significance of secondary or indirect impacts as a result of growth inducement; and (4) identifying mitigation measures or alternatives to address significant secondary or indirect impacts. CEQA Guidelines Appx. G Section XIII(a). The DEIR must be revised to provide this analysis and based on this analysis, to revise other environmental analyses including but not limited to population and housing, transportation, air quality, among other topics where impacts are derived in part from direct and indirect growth assumptions.

O-CSN-1.46 (cont'd.)

2. The DEIR's Analysis of and Mitigation for the Project's Population, Employment and Housing Impacts is Inadequate

O-CSN-1.47

PH-3

The DEIR's approach to analysis of population and housing does not adequately analyze Project-related impacts associated with changes that would occur with Project (Plan) implementation to the population, including employment and residential growth. Instead of actually analyzing the Project's impacts related to population and housing, the DEIR, in reliance on the Initial Study, asserts that all impacts both direct and indirect will be less than significant. Neither the DEIR or the Initial Study contain facts or evidence to support this conclusion. The result is a lack

[13] The Financial Analysis is intended to implement the Plan's public benefits and as such it is of critical importance it be based on a stable and finite Project description that is consistent throughout the Plan, DEIR and other related documents. That is not the case and as such, a revised DEIR and revised policy papers and financial analyses must be completed based on a consistent, stable, complete and finite Project description.

of information about the actual severity and extent of impacts associated with significant growth in population, jobs and housing. For a Project (Plan) that will guide development of the Area for 25 years (until 2040) and likely be the basis of streamlined permitting for development projects (see e.g., DEIR at page 1-7), it is especially important that the DEIR comprehensively identify and analyze its impacts on growth, population, housing and employment.

In reaching the conclusion that impacts related to population and housing are less than significant, the DEIR points to the following documents: Initial Study (DEIR Appendix B at pages 77 to 88); DEIR Chapter II, Project Description; and Section IV.A Land Use and Land Use Planning. DEIR at page I-3. The Initial Study notes that the population growth accommodated in the Plan could result in physical changes related to transportation, air quality, noise and public services and utilities, as well as other environmental resource areas and suggests these impacts are addressed in the respective environmental topic sections, but finds impacts to be less than significant.

O-CSN-1.47 (cont'd.)

In determining impact significance associated with growth in population, employment and housing, CEQA requires analysis of the following topics (see Appendix B, Initial Study at page 77):

- Would the project induce substantial population growth in the area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?
- Would the project displace substantial number of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?
- Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

In addition to these questions, the DEIR must also answer the question would the project result in a greater imbalance between jobs and housing, including jobs housing fit,[14] to address potentially significant impacts associated with increased vehicle miles traveled (greenhouse gas, air quality, traffic, etc.), as well as to analyze the potential for the Project to generate increased demand for housing, services and infrastructure.

The DEIR's analysis of these potential impacts associated with population, employment and housing is inadequate for all of the following reasons.

[14] Jobs-Housing fit means the extent to which housing prices or rents are matched to the local job salary ranges. Jobs-Housing balance provides a general sense of how in or out of balance housing to fit the local workforce may be. Jobs-Housing fit provides an essential and more granular sense of whether – even if in balance – local employees are able to reside locally or must commute long distances for housing affordable to them and their families. Without jobs-housing fit information, readily available using Census and other data, it is not possible for the DEIR to adequately analyze many Project-related and cumulative impacts including demand for new housing and vehicle miles traveled, among others.

First, as described above, there is no consistent, stable and finite Project description as to the growth allowed by the Project. For this topic, the DEIR relies on the Initial Study for analysis. Here, as noted above, the Initial Study is based on a different Project in terms of Project Area boundary, allowed growth and other project details. Discussions in the Initial Study are based on out date, inconsistent and incomplete setting (environmental baseline) information including but not limited to information about the number of existing housing units and affordable housing units, the number and type of jobs in the Project area, as well as other information necessary for an adequate analysis of impacts associated with population and housing. For these reasons alone, a revised DEIR must evaluate the impacts of the Project with respect to population and housing and identify mitigation for impacts as they are likely significant.

Second, the DEIR errs in relying on the Initial Study's discussion of impacts related to population and housing as the required analysis of these impacts. The Initial Study fails to adequately consider the direct and indirect environmental impacts from the Project's increased housing and job creation. The Initial Study's discussion of impacts related to population and housing is incomplete and conclusory in specific respects as described by impact topic below.

O-CSN-1.47 (cont'd.)

- Would the project induce substantial population growth in the area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?

The DEIR concludes that development under the Project would not induce substantial population growth, either directly or indirectly and therefore this impact is Less than Significant. DEIR Appendix B, Initial Study at page 82, DEIR in reliance on the Initial Study at page I-2.

The basis for this conclusion is that although development under the Project (Plan) would result in greater development density within the Plan area compared to existing zoning, the development projects that could be proposed and approved pursuant to the proposed zoning controls would accommodate population and job growth already identified for San Francisco, and projected to occur within City boundaries, and thus would not induce substantial population growth, either directly or indirectly. DEIR Appendix B, Initial Study at page 82. According to the Initial Study:

> "Regardless of the scenario and associated population projections, none of the Plan options or variants would stimulate new population or job growth within San Francisco that is not already projected to occur by regional growth forecasts and regional air quality planning efforts. For San Francisco, this includes a projected increase of approximately 101,000 households and 191,000 jobs during the period from 2010 to 2040 (see Growth Anticipated in Local and Regional Plans, above). The Plan policies would not trigger the need for roadway expansions or result in the extension of infrastructure into previously unserved areas. Rather by allowing for more density

within the Plan area, and accommodating growth that is projected to occur within San Francisco, development under the plan would have the effect of alleviating development pressure elsewhere in the City and promoting density in the already urbanized and transit-rich Plan area. Therefore, the Plan would not induce substantial population growth beyond that anticipated by regional forecasts, either directly or indirectly, and this impact would be less than significant." DEIR Appendix B, Initial Study at page 84.

Instead of providing an adequate analysis of these impacts based on the current Project, the DEIR refers to the discussion of population and housing in the Initial Study in reaching its conclusion that impacts will be less than significant. There are many reasons this approach is flawed. First, accurate and consistent existing and projected population and housing and job growth are essential facts to support this conclusion. The Project addressed in the Initial Study and the DEIR are different and therefore the Initial Study cannot adequately analyze the Project as currently proposed. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with both direct and indirect population growth in the area will be less than significant is not supported by analysis, facts or evidence as required. The Project (Plan) clearly will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. The Initial Study states that the Project (Plan) allows up to 56,400 new jobs by 2040 and an increase in population of 23,400. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study. DEIR Appendix B, Initial Study at page 85.[15] Despite this substantial increase in jobs, residents and housing, the Initial Study dismisses impacts as less than significant based on the assertion the growth in within projected growth for the City as a whole and that the Plan itself "would not result in direct physical changes to population or housing." DEIR Appendix B, Initial Study at page 80. This is simply wrong. The Project (Plan) by allowing substantial development in the area including development projects proposed in reliance on the Plan and "that would be allowed under the Plan" will result in changes to the Project Area's physical environment; changes that must be analyzed in the DEIR and were not analyzed in City-wide or regional plans or related environmental documents. (DEIR at page IV-8 to IV-10). The argument that the Project will result in less than significant impacts because growth is within regional and/or City-wide growth projections is contrary to CEQA's requirement to analyze the significant impacts of a Project against existing conditions (setting) and for the project area. By any measure, the increase in growth as a result of the adoption of the Project is substantial and the numerous impacts associated with substantial new growth of jobs and housing significant as well.

O-CSN-1.47 (cont'd.)

A revised analysis must be completed and recirculated with the following elements:

[15] It is noteworthy these growth assumptions are vastly different than presented in the Central SOMA Plan, DEIR, Financial Analysis and policy papers. See discussion of Growth Inducement in this letter for examples of the vastly different descriptions of growth under the Project.

- A complete, stable and consistent description of the Project in terms of growth allowed and broken out by potential new housing units, housing affordability, potential new households, population and employment (employment by general category of job and employees by general salary range), among other information necessary to undertake the analysis. To resolve the inconsistencies and confusion between the Initial Study and DEIR, a revised NOP/IS should be recirculated in advance of a new Draft EIR.
- Complete, consistent and up to date baseline (setting information) including but not limited to existing population and demographical information, housing, housing affordability, deed restricted units, type of units (e.g., senior, family, other) households, population and employment (by general category of jobs; e.g., service, tech, and general salary ranges).[16]
- Analysis of the impacts associated with growth of housing, population and employment within the Project Area in terms of both direct (new homes or businesses) and indirect impacts (demand for infrastructure or services). The California Courts have established a framework for considering population-related impacts. When analyzing these impacts, and EIR should identify the number and type of housing units that persons working in the project area can be anticipated to require, and identify the probable location of those units. The EIR also should consider whether the Project includes sufficient services and public facilities to accommodate the anticipated increase in population. If it is concluded that the Project area lack sufficient units and/or services, the EIR should identify that fact and explain that action will need to be taken and what that action entails so that indirect impacts can be disclosed and analyzed. Once the EIR determines the action needed to provide sufficient housing, services and public facilities, CEQA then requires an examination of the environmental consequences of such action.

O-CSN-1.47 (cont'd.)

A complete analysis of population growth thus requires two distinct and logical steps. First, an EIR must accurately and completely estimate the population growth that a project would cause, both directly and indirectly. Specifically, in this case, the DEIR must estimate the population growth accommodated by the new housing and the number of employees the Project will require as compared with existing baseline conditions, including whether those employees are likely to be new to the area and region and generally what the types of employment and commensurate salary ranges may be.[17] Guidelines Appx. G Section XII(a) directing analysis of whether project would induce substantial population growth. The DEIR also must consider the

[16] All available by census and other readily accessible data sources.

[17] The Central SOMA Plan provides parameters for new development that provide a clear sense of the type of new growth in employment that will result from Plan adoption. That is how the Financial Analysis prepared by Seifel Consulting, Inc., was able to derive detailed prototypical developments for the Plan Area based on the Central SOMA Plan. This same approach needs to be taken to developing a complete Project description.

growth that a project would indirectly cause, whether through stimulating the local economy so that new employment opportunities draw new population or by providing infrastructure that allows new residential construction. Guidelines Section 15126.2(d) ("Discuss the ways in which the proposed project could foster economic or population growth. . . . ").

Step two in analyzing the impacts of population growth is to consider the environmental impacts of serving that estimated new direct and indirect population. Thus, the EIR must not only evaluate whether a project would induce substantial growth, but also whether such growth would require construction of new housing, infrastructure or services, including roadway improvements for emergency vehicle passage,[18] child care and schools. Guidelines Appx. G Section XII(a). (c). If new construction will occur, then the EIR must analyze the environmental impacts of that construction. The EIR must also consider whether the new population would place demands on public services, including schools and roads. Guidelines Appx. G Section XIII(a). The EIR than must consider the environmental impacts of providing such facilities if they are necessary.

O-CSN-1.47 (cont'd.)

Here the Initial Study relied on by the DEIR for the analysis failed to consistently and accurately estimate and analyze direct and indirect population growth caused by the Project. The DEIR does not disclose that the Project would also indirectly induce additional people to move to the area, which could result in additional potentially significant environmental impacts. In fact, as described in detail above, the Project description fails to provide consistent and complete information about the Project's population, employment and housing. Nonetheless, the Initial Study and DEIR conclude that Project impacts associated with population and housing will be less than significant.

This is too simplistic a conclusion, as no single factor determines whether a project will indirectly trigger population growth. For example, in this case, the population increase would almost certainly require new and expanded services and would inject new money into the local economy inducing additional growth and development. A larger population in this neighborhood, would surely increase demand on schools and generate increased demand for restaurants, grocery stores, medical care and the like that do not currently exist to serve the planned growth. The additional of 25,000 new residents and over 63,000 jobs will certainly increase need for a full range of services including schools, day care, police, fire, medical and more. This increased demand would also further induce businesses to expand and new businesses would crop up to serve the larger population and businesses. This would require new employees and draw new residents to the area, who in addition to the direct employment generated by the Project, would also need housing. Neither DEIR nor Initial Study analyze these

[18] The DEIR defers the plan for emergency vehicle access to a future design of roadway projects and review by SFFD and SFPD. A Project Area-wide and complete design of roadway projects necessary to serve the development allowed by the Plan must be completed and analyzed in a revised DEIR. Deferring this essential element of the Project until later renders unlikely the City's ability to create the necessary emergency vehicle access to overcome the increased traffic congestion the Project will create.

impacts. In addition, the Project includes Plan objectives implemented through zone changes to favor non-residential development over other kinds of growth and favoring office space and hotels[19]. DEIR at II-13. The result of favoring non-residential over residential development is likely to be an even greater than disclosed jobs-housing imbalance and jobs-housing fit. The direct and indirect impacts of this growth must be disclosed and analyzed in a revised and recirculated DEIR.

The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. Examples of the kinds of mitigation that should be considered include, but are not limited to, the following:

O-CSN-1.47 (cont'd.)

- In combination with strict policies prohibiting displacement of senior, deed restricted and affordable housing, and lowering the total allowable amount of new non-residential uses (e.g., cap on non-residential uses), addition of policies and programs requiring affordable housing to be built concurrent with or prior to new non-residential development in the Project Area (examples include provisions in the Treasure Island and Shipyard projects, among other local and regional policy and regulatory examples).
- Approval and implementation of the Project Area street network plan to serve the Project and review and approval by SFFD and SFPD prior to new development allowed under the Plan proceeding. This should be completed and included in a revised DEIR.
- SFFD and SFPD service reviews and plans to accommodate the proposed growth completed and approved prior to new non-residential development allowed by the Plan occurring.
- Policy, program and regulation(s) in place for a required housing mix in all new residential projects to provide family housing prior to new development allowed by the Plan. The policy and program should be completed and included in a revised DEIR.

[19] Hotels notorious for lower paying hospitality jobs; jobs that currently are difficult to fill in San Francisco due to the astronomically high housing costs and lack of sufficient housing. The revised DEIR must analyze the Project-related and cumulative impacts associated with the projected increase in San Francisco of hospitality and service jobs since it is the workforce associated with these lower paying jobs that likely will be traveling the farthest from work and home. There is currently no analysis of this in the DEIR.

- Up to three new sites identified and acquired for new parks prior to new development and fees assured for development of those parks. At least one new park under construction concurrent with or prior to new development allowed under the Plan.
- Reduction of the amount of new employment under the Plan through among other revisions, adoption of the reduced height alternative and prohibition of high rises except where immediately adjacent to transit hubs. A cap should also be placed on total new employment until plan expiration in 2040.

These and other feasible mitigation measures must be identified in a revised DEIR to address the significant population, employment and housing impacts of the Project and cumulative development on the Project area. A revised Financial Analysis should accompany the revised Plan and DEIR setting forth costs associated with housing, services and other community benefits of the Project and laying out a revised approach to funding implementation of these Project elements.

O-CSN-1.47 (cont'd.)

- Would the project create demand for additional housing, necessitating the construction of housing?

The DEIR concludes that development under the Project (Plan) would not generate housing demand beyond projected housing forecasts. DEIR Appendix B, Initial Study at page 84. In reaching this conclusion, the DEIR changes the question to include "beyond projected housing forecasts" and therefore fails to respond to the key question – would the project create demand for additional housing – thereby avoiding the required analysis.

The basis for the Initial Study's (and DEIR's) conclusion that demand for new housing is less than significant is twofold: First the plan would not result in physical effects directly and second, the plan merely accommodates planned growth. According to the Initial Study:

> "As a regulatory program, the Plan would not result in direct physical effects but rather would result in new planning policies and controls to accommodate additional jobs and housing." DEIR Appendix B, Initial Study at page 84. "The goal of the Plan is to accommodate regional growth projections for San Francisco and to shape and accommodate regional growth to projections for San Francisco and to shape and direct that growth toward appropriate locations. Because San Francisco is a regional job center, and because the Plan area is near regional transit lines, the Plan area represents one of the locations appropriate for new office development. As described below, the potential housing demand generated by expected office development would be offset by new housing development forecast both within the Plan area and for the City as a whole, as well as through the City's affordable housing programs." DEIR Appendix B, Initial Study at pages 84-85.

"Overall, the conservatively estimated housing demand resulting from Plan-generated employment would be accommodated by increases in housing supply, primarily within the Plan area and elsewhere in San Francisco, and the impact would be less-than-significant." DEIR Appendix B, Initial Study at page 86.

Instead of providing an adequate analysis of these impacts based on the current Project (Plan), the DEIR simply defers to the discussion of population and housing in the Initial Study.

There are many reasons the DEIR's approach to the analysis of housing demand generated by the Project (Plan) is flawed. First, accurate and consistent existing and projected population, housing and job growth figures are essential facts to support this conclusion. Yet, the Initial Study and DEIR contain vastly different figures as discussed in this letter. See e.g., Table 4, 5 and 6 in the Initial Study and Table IV-1 in the DEIR at page IV-6. Second, the conclusion that impacts associated with employment growth and associated demand for housing in the Project area will be less than significant is not supported by analysis, facts or evidence as required. To the contrary, the Project (Plan) will add significantly to the population and employment of the Project area, changing the character of the area and increasing the jobs to housing imbalance. Specifically, the Project (Plan) allows over 56,400[20] new jobs by 2040 and an increase in population of 23,400. Source Initial Study. New housing units under the Project (Plan) total approximately 13,200 according to the Initial Study (page 85) and 7,500 housing units according to the DEIR. Thus, there is no question the Project (Plan) will result in much more job growth than housing, exacerbating an already extreme jobs-housing imbalance in both the Project area and the City and Region, causing workers to commute farther and in turn increasing vehicle miles traveled above that described in the DEIR. Increased vehicle miles in turn will result in greater demand for transit, increased traffic congestion, air pollution and greenhouse gas emissions. A revised DEIR must analyze these impacts.

O-CSN-1.47 (cont'd.)

A revised analysis in a dedicated DEIR section called must be completed and recirculated with the following elements:

- A complete, stable and consistent description of the Project in terms of growth in housing, housing affordability, deed restricted units, households, population and employment (by general category of job), among other information necessary to undertake the analysis. To resolve the inconsistencies and confusion between the Initial Study and DEIR, a revised NOP/IS should be recirculated in advance of a new Draft EIR.
- Complete, consistent and up to date baseline or setting information including but not limited to existing population and demographical information, housing, housing affordability, deed restricted units, households, population and employment (by general category of jobs; e.g., service, tech, salary ranges, etc.).

[20] The Central SOMA Plan allows even more jobs – 63,600 – rendering the jobs-housing imbalance even greater than described in the Initial Study.

- Description of existing job-housing fit and projected jobs-housing fit under the Project (Plan) based on a breakdown of new jobs (employment) in terms of general type and salary ranges and existing and projected housing rents and prices.
- Analysis of the impacts associated with new employment generated demand for housing within the Project area. This analysis must be based on facts and evidence.

The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. In this case, it is clear the Project will generate significant demand for housing beyond that allowed by the Project in the Plan Area. The revised DEIR must address how much new housing will be needed to accommodate new employees and their families? Where will that housing need be met either in existing housing or new housing? If new housing is needed, which it likely is, where will that new housing be constructed – in the Project Area or beyond? What are the physical environmental impacts associated with construction of the new housing? Will indirect or induced growth from the Project result in a demand for additional housing, beyond that required to house new Project employees? If so, where will that housing be located? And so on. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. See above discussion of feasible mitigation measures that should be considered in a revised DEIR.

O-CSN-1.47 (cont'd.)

- Would the project displace substantial number of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?

The Project will inevitably lead to the displacement of low and moderate income residents because of the incentives provided through zoning and other mechanisms for new non-residential development in the Project area. Currently over 10,000 people live in the Central SOMA neighborhood or Project area in approximately 7800 housing units. These residents are among the most ethnically and economically diverse in the City with about 60% of residents people of color.[21] Although the median household income is slightly higher than the City average, the neighborhood has one of the highest levels of poverty with 31% of the population living at or below 200% of the poverty threshold.[22] Yet, the DEIR concludes that the Project (Plan) would not displace a large number of housing units or necessitate construction of replacement housing outside the Plan area finding this impact less than significant. DEIR Appendix B, Initial Study at page 86. The DEIR reaches this conclusion despite

O-CSN-1.48

OC-1

[21] SF Dept of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, page 6 (11-30-12).
[22] Id. p. 21

acknowledgement that the Project (Plan) could require the demolition of existing housing units within the Plan Area. The basis of the DEIR's conclusion is in short:

> "From the perspective of the City's housing stock, the loss of housing units as a result of development under the Plan would be offset by the production of up to approximately 13,200 net new housing units (Initial Study page 86) within the Plan area in addition to residential development elsewhere in San Francisco as has been occurring and is expected to occur in the future, in addition to the fees paid for the jobs/housing linkage program and Inclusionary Affordable Housing." DEIR Appendix B, Initial Study at pages 86-87.

The Initial Study contradicts this statement at page 85, noting that the project demand for housing created by the Project would be about 19,900 units, far surpassing the potential addition of about 11,700[23] units projected to be created in the Plan area by 2040. The current Project is projected to produce fewer housing units – approximately 7,500 -- resulting in an even larger gap between new employees in the Project area and new housing units. There is no question the Project will generate a demand for housing beyond that proposed by the Project. A revised DEIR must acknowledge this impact and provide further evidence housing need will be met and where and depending on where, the impact associated with the development of that new housing.

O-CSN-1.48 (cont'd.)

The Initial Study also argues that the potential number of units that could be displaced by the Project (Plan) **as too speculative** and not necessary to concluding impacts would be less than significant, reasoning that the Plan is intended to promote additional density along with Planning Code requirements for replacement and conservation would offset displaced units, a. DEIR Appendix B, Initial Study at page 87. The number of units or range of units potentially displaced by the Project is not speculative. In fact, the information exists to determine the possible range of housing units in the Project area that could be displaced as demonstrated by detailed modeling supporting the shadow discussion in the DEIR and the equally detailed development scenarios presented in the Financial Analysis. Subsequent development projects that "would occur under the Plan" listed at pages IV-8 to IV-10 plus cumulative projects listed at IV-11 to IV-12 also provide a basis for determining the potential range of units displaced by the adoption and implementation of the Project.

For these reasons the approach the DEIR takes to analysis of this potential impact falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance. A revised analysis in a dedicated DEIR section must be completed and recirculated with the following elements:

- A map and text displaying the location, number and affordability (e.g., affordable, deed restricted and senior) housing units in the Project area. This information should disclose the number of affordable units that could revert to

[23] The Central SOMA Plan would create only 7,500 housing units.

market rate due to limited duration of the affordability of those units under agreement or other terms.

- An overlay of proposed zoning indicating potential incentive new development overlap or conflict with existing housing units.
- An analysis of potential (worst case) displacement of units broken down by market rate, affordable and deed restricted based on the two inputs above. In addition, estimate of the total number of residents potentially displaced.
- Description of how specifically City planning policies and code provisions would result in avoidance (conservation) or replacement of units displaced by new development and neighborhood gentrification due to a likely rise in the number of high income wage earners occupying the new jobs.

O-CSN-1.48 (cont'd.)

The DEIR's failure to adequately evaluate the Project's impacts on population, employment and housing constitutes a serious flaw. In this case, it is clear the Project will displace housing in the Project area. The revised DEIR must address how much, where and whether housing displaced is affordable or serving special needs. The revised DEIR must also describe specifically how these units will be replaced if displaced and where. The DEIR should be revised to include a comprehensive analysis of these impacts and identify effective and enforceable mitigation for those impacts that are determined to be significant. In addition, a revised DEIR must identify feasible mitigation measures to address the likely significant impacts associated with the demand for new housing affordable to the new workforce and with the provision of new services. See above discussion of feasible mitigation measures that should be considered in a revised DEIR.

3. The DEIR's Analysis of and Mitigation for Public Services Impacts is Inadequate

Instead of actually analyzing the Project's impacts on public services, in reliance on the Initial Study, the DEIR concludes that the Project (Plan) impacts to public services including police, fire and schools will be less than significant. DEIR Appendix B, Initial Study at pages 118 to 124, DEIR at page I-2. As stated above, the DEIR errs in relying on the Initial Study for the analysis of public service impacts since the Project described in the Initial Study is materially different than that described in the DEIR. Nonetheless, neither the Initial Study or the DEIR contain facts or analysis to support the conclusion that across the board, impacts to public services will be less than significant. The result is a lack of information about the severity and extent of the Project's impacts on public services including police, fire, emergency services, child care and health services, among others.

O-CSN-1.49

PS-2

The Initial Study acknowledges that specific development projects allowed under the Plan and associated increases in population and land use intensity would result in an increased demand for public services noting that the Southern Station (in 2013) receives approximately 25 % of the City's call for service. Initial Study at page 120. This level of calls for service has likely gone up since 2013 due to growth in and around the Project area.

The Initial Study's conclusion that impacts to police, fire and emergency services is circular, incomplete and unsupported by analysis and facts. Without any analysis of the need for additional fire, police or emergency services, the Initial Study concludes:

> "…development under the Plan would not result in the need for new or physically altered police protection facilities, and this impact would be less than significant. The potential significant effects of any new or physically altered fire facilities are analyzed in other sections of this Initial Study or will be further analyzed and included in the EIR." DEIR Appendix B, Initial Study at page 121.

The Initial Study notes that the SFFD conducts ongoing assessments of its service capacity and response times and would continue to do so in response to projected growth over the lifetime of the Plan; as another excuse for excluding meaningful analysis. The limited discussion in the Initial Study also ignores the likely significant impacts to these services associated with increased traffic congestion noting that facilities are in the district and presumably unaffected by traffic gridlock.

This approach falls short of CEQA's requirements for analysis, facts and evidence to support conclusions concerning impact significance. A revised analysis in a new DEIR section must be completed and recirculated with the following elements:

O-CSN-1.49 (cont'd.)

- Setting (baseline) information including up to date calls and response times for police, fire and emergency services as well as the SFFD and SFPD's standards for personal per capita, equipment and facilities. This description should include a current assessment of the capacity of these services and assessment of unmet demands for services, facilities and funding.
- Accurate project description information including but not limited to the growth in population by residents and employment allowed by the Project and a breakdown of the types of development projected as service needs vary by development type.
- A clear articulation of the City's adopted standards for all public services impacted by the Project (e.g., acceptable response times, personnel per population, etc.).
- Based on projections for new development under the Project, projected increases in calls, types of call based on proposed development and associated need for additional personnel and facilities based on adopted and recognized standards.

The Central SOMA Neighborhood (Project area) faces "amongst the highest violent and property crime rates in the City[24]. – characterize the crime. There is no question the addition of over 63,000 new jobs and 23,400 residents will result in significant demand for additional police and fire personnel and likely facilities and equipment. In addition, increased congestion on the Project area roads will likely result in reduced response times unless additional

[24] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

resources are provided in the area (e.g., sub-stations, additional personnel, equipment and equipment storage, emergency lanes and pull outs, etc.).[25] A revised analysis of these impacts must be prepared and recirculated in a new DEIR and feasibility mitigation measures identified.

O-CSN-1.49 (cont'd.)

4. The DEIR Errs in Concluding Project Potential Shadow Effects Will Be Less than Significant

The Central SOMA Neighborhood (Project area) is currently characterized by mid-rise buildings affording the neighborhood good natural sunlight and light as compared with the Financial District. The changes proposed by the Project (Plan) allow for approximately eight towers between 200 and 400 feet in height, five buildings of 160-feet in height and six of 130 feet in height as well as others ranging from 200 to 350 feet in height. Developments of 100% affordable housing could achieve greater heights by right using the State's affordable housing density bonus. DEIR at 11-22. According to the Central Soma Plan and DEIR: "The proposed height limits are intended to minimize shadow impacts on South Park, Yerba Buena Gardens, and the Bessie Carmichael School schoolyard." DEIR at page II-23.

O-CSN-1.50

SH-2

Unlike many other topics where the DEIR relies on the Initial Study, in this case, the DEIR addresses the Project's potential shadow effects on publicly accessible areas, including public parks, publicly accessible private open spaces, and sidewalks using computer modeling and detailed graphics displaying shading in DEIR Section IV.H..[26] The conclusion reached concerning shadow impacts is as follows:

> "…development pursuant to the Plan would not create new shadow in a manner that substantially affects the use of existing outdoor recreation facilities or other public areas. Additionally, the specific massing and design of a subsequent development project would be reviewed to determine whether the project could have shadow impacts not identified

[25] The DEIR's discussion of Cumulative Emergency Vehicle Access Impacts is instructive. DEIR at page IV.D-108. The discussion acknowledges the traffic congestion in the Project Area and that the Project and cumulative development will make it worse: "Development under the Plan and the proposed street network changes would contribute considerably to these significant impacts on emergency vehicle access." DEIR at IV.D-108. The DEIR errs in concluding an Emergency Vehicle Access Consultation would mitigate these impacts. The consultation is deferred to the future and requires review of each street network project to be sure that private vehicles would not be precluded from yielding right of way to emergency vehicles. That plan must be completed now, reviewed and approved as part of a revised DEIR and not deferred until there is no longer flexibility to improve the road system to allow for emergency vehicle access and movement as needed. Such improvements may require additional physical space, pull-outs and other modifications to address an already dire situation due to existing congestion, the DEIR admits will be made worse by the Project plus cumulative projects.

[26] It is instructive that the analysis is qualitative. Specifically, according to the DEIR, the analysis is qualitative and not quantitative since quantitative analysis is typically required for analysis of individual buildings under section 295 or as part of a project specific review. DEIR at page IV.H-11. A revised DEIR should provide quantitative analysis of the Project as well since numerous specific development projects listed in the DEIR will proceed with Plan adoption.

at this programmatic level of analysis. Therefore, the impact would be less than significant." DEIR at page IV.H-38.

The DEIR's own analysis supports a different conclusion. Specifically, the DEIR's modeling clearly indicates that the Project will result in significant shading of South Park, Victoria Manalo Draves Park and Gene Friend Recreation Center, as well as several other public open spaces and neighborhood sidewalks. See for example, Figures IV.H-13 and 14 showing shadow on South Park during most of the day during seasons of shorter day length [when sunlight in the limited open spaces in this neighborhood is even more important]. The DEIR states in this regard:

> "During the seasons of shorter day length and longer mid-day shadows, the Plan could result in an increase in shadow on South Park during most of the day. At the winter solstice, small bits of new shadow could be added to shadow from existing buildings over various parts of the park throughout the day, as shown in Figure IV.H-13 and Figure IV.H-14."

O-CSN-1.50 (cont'd.)

Contrary to the model results and description of the impact above, the DEIR finds the new shadows, despite coverage of one of the few public open spaces, of limited extent and therefore less than significant. This conclusion is laughable given the clear proof in the DEIR that the Project will cast shadows on South Park for nearly half the year. These impacts are compounded by the fact that the neighborhood is so underserved by public parks and recreation spaces.

Similarly, the extent and duration of shadows cast on public sidewalks will increase as taller buildings are developed, as shown in DEIR Figures IV.H-2 through Figure IV.H-10. Casting shadows for nearly half the year clearly requires a conclusion of significant impact warranting consideration of mitigation and alternatives. Mitigation and alternatives that must be considered to reduce these impacts include but are not limited to:

- Adoption of the reduced height alternative and prohibition of high rises except where immediately adjacent to transit hubs.
- Lower height limits on sites where shadow impacts are shown by the DEIR's analysis to extend into existing open space, park and recreation areas.

5. The DEIR Errs in Concluding Impacts to Open Space and Recreation Will Be Less Than Significant

O-CSN-1.51

RE-2

The Central SOMA Plan area has very limited public open spaces and facilities. While a robust, ethnically and economically diverse community, Central SOMA faces serious challenges in terms of lack of open space and recreational opportunities. Currently 67% of residents live within ½ miles of a public recreational facility compared to 91% for the City as a whole[27]. South Park is

[27] SF Department of Public Health, Environmental Health, Sustainable Communities Health Assessment: Central Corridor Plan, p. 4.

the only large-scale open space in the Plan Area and the only Recreation and Park Department property. While there are open spaces adjacent to the Area including Yerba Buena Gardens, the uneven distribution of open spaces and lack of them leaves the area underserved. The General Plan Recreation and Open Space Element (ROSE), adopted in 2014, identifies portions of the Plan Area as in need of new open space. DEIR at page II-31.

The DEIR relies on the Initial Study for the required analysis of impacts to open space and recreation. DEIR at page I-2. According to the Initial Study, development under the Plan would have an adverse environmental impact if it were to cause the deterioration of existing recreational resources through increased use or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. DEIR Appendix B, Initial Study at page 104. The Initial Study notes that any existing unmet demand for parks and recreational resources that currently exist in the Plan area is not in and of itself considered to be a significant impact on the environment noting that the Plan area is deficient in these resources. Id.

O-CSN-1.51 (cont'd.)

Based on the Project's proposed network of new open spaces, including POPOS, and a potential new park,[28] the Initial Study concludes that impacts to open space and recreational resources will be less than significant. This conclusion is unsupported by facts, analysis and evidence. The Initial Study briefly alludes to the City's minimum standards for open space and recreational resources per capita, but nowhere in the Initial Study or DEIR is there a quantitative analysis of the need for new open space and recreational resources based on the substantial growth in employee, resident and tourist populations in the area. Given the current lack of adequate resources, growth not accompanied by adequate new development of parks and recreational resources is clearly a significant impact of the Project. Moreover, the Project's proposed new open spaces is far from sufficient to accommodate the new growth based on the City's own standards. A revised DEIR must analyze the Projects quantitative impacts on parks, open space and recreational resources. Feasible mitigation measures should also be identified including the addition of more than one substantial new park in the Central SOMA area. If such facilities are not identified now at the Area Plan stage, it will be too late to identify potential sites and determine how costs of implementation can be shared by new development. The revised DEIR must also include an adequate analysis of the physical environmental impacts associated with construction of new facilities and cannot defer this analysis to a later project specific environmental analysis.

6. The Project is Inconsistent with the General Plan and Other Applicable Planning Documents

O-CSN-1.52

PP-4

The DEIR must include a complete and forthright analysis of the Projects consistency with the General Plan and other applicable planning documents, ordinances and regulations.

[28] It is far from clear that the proposed new park will ever be a reality. New development should be conditioned on certainty for all essential services to accommodate growth, not limited to new parks and recreational resources.

Inconsistencies between the Project and the General Plan or other applicable planning documents that were enacted to protect the environment may constitute significant impacts in themselves and can also be evidence of other significant impacts that must be analyzed in the DEIR. In addition, where a Project is inconsistent with the General Plan it may not be lawfully adopted or approved.

In this case, after discussing only some of the applicable plans, the DEIR incorrectly concludes across the board that the Project will not substantially conflict with any of the plans, policies or other provisions discussed, noting that the Planning Commission and Board of Supervisors would review the Plan for consistency with the General Plan and consider possible amendments to achieve conformity. See DEIR Chapter III and page III-1.

Some examples of the Project's glaring inconsistency with the General Plan include, but are not limited to, the following:

Plan Provision	Inconsistency
Urban Design Element, General Plan: Policy 3.5: Relate the height of building to important attributes of the city pattern and to the height and character of existing development; and Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction. DEIR at page III-10	The DEIR incorrectly concludes the Project would not conflict with the objectives and policies of the Urban Design Element. There is a clear inconsistency between the Project and the Urban Design Element. The Project (Plan) allows building of 350 feet or more in a neighborhood that is currently mid-rise and planned to remain mid-rise in the Central Corridor Plan. According to the Central Corridor Plan, "[t]he predominant character of Soma as a mid-rise district should be retained, and the presence of high-rises reduced by limiting their distribution and bulk." Central Soma Plan at page 32. Holding up this policy direction in the Central Soma Plan are numerous reasons mid-rises rather than high rises are a better fit for the neighborhood and would result in fewer significant impacts. The DEIR's assertion the Project would not be inconsistent with the General Plan (DEIR at page III-10) is undermined by the statements and facts in the Central Corridor Plan and its supporting documents.
Recreation and Open Space Element Policy 1.9: Preserve sunlight in pubic open	The DEIR incorrectly concludes the project will not conflict with this policy.

O-CSN-1.52 (cont'd.)

spaces. DEIR at page III-II.	There is a clear inconsistency between the Project and this Policy as documented by the DEIR section on Shadows. Specifically, the DEIR states that the Project will create new shadow on several parks in the area. DEIR at page III-II; see also discussion of Shadow section in this letter). In addition, the DEIR Figures show significant new shadows on public streets and POPOS. DEIR pages IV.H-35, IV.H-38, Figures in Section IV.H of the DEIR. Based on evidence in the DEIR, the DEIR incorrectly concludes the Project will no conflict with this Policy.
Western SOMA Plan Policy 1.2.4: Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street." DEIR at page III-6 As well as other provisions of the Western SOMA Plan	The DEIR incorrectly concludes that the Project would not be demonstrably inconsistent with the Western Soma Plan. DEIR at page III-8. The Project is clearly inconsistent with this policy and therefore clearly inconsistent.
Eastern SOMA Plan	The DEIR incorrectly states that the Project would not be demonstrably inconsistent with the East Soma Plan in part because the applicable parcels in the Plan would be incorporated into the Central Soma Plan. The Project's preference for employment (non-residential) uses is in stark contrast to the objectives (1.2 and 1.2) of the Eastern Soma Plan. Moreover, the Project's proposed substantial growth in employment without a commensurate plan for housing will put significant pressure on the East Soma Plan for additional housing growth not anticipated by the Plan.

O-CSN-1.52 (cont'd.)

A revised DEIR must include expanded and forthright analysis of the Projects potential inconsistencies with all applicable plans including voter approved propositions, San Francisco's Urban Design Guidelines and the newly adopted TDM Ordinance. Where an inconsistency with a Plan or policy would result in an environmental impact (e.g., shadows, public services,

housing demand), those impacts must be analyzed in the appropriate sections of the revised DEIR in a manner consistent with the policy analysis.

O-CSN-1.52 (cont'd.)

C. The DEIR Must be Recirculated

Decision makers and the public cannot possibly assess the Project's impacts through the present DEIR which is riddled with omissions, errors and inconsistencies. Among other fundamental deficiencies, the DEIR repeatedly understates the Project's significant environmental impacts and therefore fails to formulate feasible mitigation to reduce these impacts. To resolve these issues, the City must prepare a revised DEIR that would necessarily include substantial new information.

O-CSN-1.53

GC-5

Sincerely,



Terry Watt, ACIP

Appendix A: Terry Watt Qualifications

Appendix A

Terry Watt Qualifications

Terry Watt, AICP

Terry Watt Planning Consultants

1937 Filbert Street - San Francisco, CA 94123

terrywatt@att.net Cell: 415-377-6280

Terry Watt, AICP, owns Terry Watt Planning Consultants. Ms. Watt's firm specializes in planning and implementation projects with a focus on regionally-significant land use and conservation work that advances sustainable development patterns and practices. Prior to forming her own consulting group, she was the staff planning expert with the environmental and land use law firm Shute, Mihaly & Weinberger. She is an expert in general and specific planning and zoning, open space and agricultural land conservation strategies and approaches and environmental compliance, including CEQA and NEPA. Her skills also include facilitation and negotiation, public outreach and project management. Terry is a frequent presenter at regional, national and statewide workshops and symposiums. She holds a Master's Degree in City and Regional Planning from the University of Southern California and a multi-disciplinary Bachelor's Degree in Urban Studies from Stanford University.

Terry works with a wide variety of clients throughout California including non-profit organizations, government agencies and foundations. She volunteers up to half her professional time on select projects. Recent projects and roles include:

- Project Manager and Governor's Office Liaison for San Joaquin Valley: Least Conflict Lands for Solar PV project. Project funding came from the Hewlett and Energy Foundation's, matched by environmental organizations, the California Energy Commission and other private parties. The objective of the project was to identify areas in the Valley that had very low resource values for renewable energy to serve as an incentive for development of least conflict lands rather than valuable resource lands. Watt was responsible for overall project management and day to day coordination, multi-stakeholder (150 stakeholders) and agency (57 federal, local and agency advisors) outreach and participation, facilitation of meetings, Governor's Office convening's, all project logistics and project report. Link to Collaboration Platform – Data Basin San Joaquin Valley: http://sjvp.databasin.org/
- Governor's Office Liaison and Outreach Coordinator for the State's portion of the Desert Renewable Energy Conservation Plan (DRECP). As outreach coordinator, worked closely with local governments on DRECP related consistency issues with local general plans.
- Planning Consultant to California Attorney General's Office - Environment Section focusing on climate change, CEQA and general plans. (2007- 2010). While working with the Environment Section, assisted with settlements (Stockton General Plan, Pleasanton Housing Element and CEQA litigation); identified locally based best practices for local government planning to address climate change issues; and managed government outreach and consultation on general plans and climate action plans/energy elements/sustainability planning efforts. Post 2010 continue to provide periodic consulting services to the Environment Section related to select cases.
- Strategic Advisor and Planning Consultant to the Santa Clara Valley Open Space Authority, Greenbelt Alliance and Committee for Green Foothills for the Coyote Valley Project focused on developing a conservation and development plan for the Valley. Watt was responsible for preparing the group's early CEQA comment letter on the negative declaration for a proposed Warehouse Project and assisting with scoping comments for the EIR.
- Measure M-2 Sales Tax and Environmental Mitigation Measure. (2009-). Terry was the Co-project

manager/facilitator of a 30+-member environmental coalition that through a unique partnership with the Orange County Transportation Authority (OCTA) and state and federal wildlife agencies generated nearly $500 million in funding for programmatic environmental mitigation (conservation land acquisition and stewardship) in Measure M2, Orange County Transportation Sales Tax.

- State Office of Planning and Research Special Projects (2011 – ongoing). Advisor to OPR on General Plan Guidelines, Infill and Renewable Energy Templates as part of the required update of the General Plan Guidelines. Expert panelist for workshops on SB 743.
- Marin Countywide General Plan and Environmental Impact Report (2004 to 2007). Project Manager for the award-winning Marin Countywide Plan Update and its Environmental Impact Report. The General Plan was among the first to incorporate leading edge climate change, greenhouse gas emissions reduction and sustainability policies as well as monitoring, tracking and implementation measures to measure success.
- Staff to the Martis Fund, a joint project of five environmental groups and a Business Group (Highlands Group and DMB Inc.). (2008 – ongoing). The Fund was created as a result of litigation settlement. The Fund has distributed over $15 million dollars since its inception to a range of conservation (acquisition of over 5,000 acres of open space), stewardship and restoration projects and workforce housing projects (emergency rental housing support, down payment assistance and low income apartments). Funding comes from a permanent transfer fee on all real estate sales at Martis Camp. http://www.martisfund.org/PDFs/Martis-Fund-Brochure.pdf
- Tejon Ranch Land Use and Conservation Agreement. (2006 – ongoing). Project coordinator for a dialogue process between environmental groups (Natural Resources Defense Council, Sierra Club, Endangered Habitats League, Planning and Conservation League, Audubon California) and The Tejon Ranch Company that resulted in a major Land Use and Conservation Agreement for the permanent protection of 240,000+ acres (90%) of the 270,000 acre Tejon Ranch. Secretary John Laird refers to the Agreement as a "miracle" agreement. In return for permanent conservation of 240,000+ acres, environmental groups agreed not to oppose projects within the development footprints; but can comment on regional planning efforts and the projects. Terry has an ongoing role overseeing implementation of the Agreement, including early role forming and managing the Conservancy formed by the Agreement. The Agreement provided the cornerstone of the Habitat Conservation Plan for a major portion of the Ranch; the Tejon Multi-Species Habitat Conservation Plan, TUMSHP, approved in April 2013. She recently joined the Board of the Tejon Ranch Conservancy created and funded by the Agreement.
- Orange County Wildlife Corridor. Project coordinator and architect for dialogue process between environmental and conservation organizations, City of Irvine and Lennar/Five Points development team that resulted in an 8 party Agreement, related general plan amendment and full funding to build an urban wildlife corridor to the specifications of the science team (6-member team jointly selected by all groups) connecting two high value conservation areas in central Orange County (Coastal and Eastern NCCP/HCP lands). Watt provides some ongoing implementation support. Recently (2017) coordinated DEIR comments letters on two Orange County County Project proposals that could adversely impact the 5 Point/Irvine Wildlife Corridor.
- Ongoing assistance and authorship of expert comments on projects with recent letters on the proposed draft Amador County General Plan on behalf of the Foothill Conservancy and the proposed Squaw Valley Resort on behalf of a coalition of environmental and labor organizations.
- Facilitator to the Bolsa Chica Land Trust for recent agreement with Landowners to purchase remaining private acres of the Bolsa Chica uplands. Currently assisting with fundraising for the property.
- Advisor to the Nature Conservancy, the American Farmland Trust, Center for Law, Energy and Environment on numerous publications concerning urban infill and conservation.

PROFESSIONAL MEMBERSHIPS AND BOARDS

- Lambda Alpha International - Golden Gate Chapter
- American Institute of Certified Planners (AICP)
- American Planning Association (APA)
- Tahoe Fund Founding Board Member
- Tejon Ranch Conservancy Board Member
- Santa Lucia Conservancy Board Member
- Founder Council of Infill Builders
- Board Member, Planning and Conservation League

AWARDS

- State and National APA Awards for Marin County General Plan
- APA Awards for South Livermore Valley Plans
- Carla Bard Award for Individual Achievement, PCL

PUBLICATIONS

Contributor to the Award Winning Textbook:

Ecosystems of California, 2016, Chapter 40:

Land Use Regulation for Resource Conservation

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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February 8, 2017

Richard Drury
Lozeau | Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607

Subject: Comments on the Central SoMa (South of Market) Plan

Dear Mr. Drury,

We have reviewed the Draft Environmental Impact Report (DEIR) for the Central SoMa (South of Market) Plan ("Plan") located in the City of San Francisco. The Central SoMa Plan (formerly, Central Corridor Plan) is a comprehensive plan for the area surrounding much of southern portion of the Central Subway transit line, a 1.7-mile extension of the Third Street light rail line that will link the Caltrain Depot at Fourth and King Streets to Chinatown and provide service within the South of Market (SoMa) area. The Plan Area includes roughly 230 acres that comprise 17 city blocks, as well as the streets and thoroughfares that connect SoMa to its adjacent neighborhoods: Downtown, Mission Bay, Rincon Hill, and the Mission District. The Plan seeks to encourage and accommodate housing and employment growth by (1) removing land use restrictions to support a greater mix of uses while also emphasizing office uses in portions of the Plan Area; (2) amending height and bulk districts to allow for taller buildings; (3) modifying the system of streets and circulation within and adjacent to the Plan Area to meet the needs and goals of a dense, transit-oriented, mix-use district; and (4) creating new, and improving existing, open spaces.

Our review concludes that the DEIR fails to adequately evaluate the Plan's impact on local and regional air quality, pedestrian safety, and traffic. As a result, air emissions and health impacts associated with construction and operation of the proposed Plan are underestimated and inadequately addressed. An updated DEIR should be prepared to adequately assess and mitigate these potential impacts.

O-CSN-1.54
GC-5

Air Quality

Failure to Adequately Assess the Plan's Air Quality Impact

The DEIR concludes that the Plan would have a less than significant air quality impact (p. IV.F-33). This conclusion, however, is incorrect for several reasons. First, the air quality analysis conducted within the DEIR is based on outdated baseline data that do not accurately reflect current traffic, air quality, pedestrian safety, and population within the Plan area. Second, the DEIR fails to account for all major development projects currently being considered within the area. As a result, the Plan's net increase in criteria air pollutants within the area, as well as it's cumulative air quality impact, are misrepresented. Due to these reasons, we find the DEIR's air quality analysis and resultant significance determination to be inadequate, and require that an updated DEIR be prepared to adequately evaluate the Plan's air quality impact.

O-CSN-1.55

AQ-1

Use of Outdated Baseline Data

According to the Bay Area Air Quality Management District's (BAAQMD) CEQA Air Quality Guidelines,[1] and as stated in the DEIR,

> "The significance thresholds for assessment of a planning document, such as the proposed Plan, involve an evaluation of whether:
>
> - The plan would be consistent with the control measures contained in the current regional air quality plan (the 2010 Clean Air Plan), would support the primary objectives of that plan and would not hinder implementation of that plan; the plan's growth in vehicle miles traveled (VMT) do not exceed the plan's population growth; and the plan would not cause localized CO impacts.
>
> If the foregoing questions can be answered in the affirmative, the proposed Plan would not:
>
> - Conflict with or obstruct implementation of the applicable air quality plan;
> - Violate any air quality standard or contribute substantially to an existing or projected air quality violation; nor
> - Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)" (p. IV.F-21, IV.F-22).

O-CSN-1.56

GC-2

Using these thresholds, the DEIR concludes that because "the Plan would be consistent with the control measures contained in the current regional air quality plan (the 2010 Clean Air Plan), would support the

[1] Air Quality Guidelines, BAAQMD, June 2010, *available at:* http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/draft_baaqmd_ceqa_guidelines_may_2010_final.pdf?la=en, p. 9-2

primary objectives of the 2010 Clean Air Plan and would not hinder implementation of the 2010 Clean Air Plan," and because "the rate of growth in VMT with implementation of the Plan would not exceed the Plan's rate of population growth and the Plan would not cause localized CO impacts," "the Plan would not violate an air quality standard or contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any non-attainment criteria pollutant" (p. IV.F-34).

This conclusion, however, is incorrect, as the DEIR's air quality analysis is based on outdated baseline data that do not accurately reflect current traffic, air quality, pedestrian safety, and population within the Plan area. For example, the DEIR conducts an analysis to determine whether or not the rate of growth in vehicle miles traveled (VMT) with implementation of the Plan would exceed the Plan's rate of population growth. This analysis, however, relies upon outdated 2010 baseline data, which is more than five years old. The DEIR states,

O-CSN-1.56 (cont'd.)

> "Growth projections prepared by the San Francisco Planning Department (and discussed under Analysis Assumptions in the Overview subsection of Chapter IV, Environmental Setting, Impacts, and Mitigation Measures) indicate that with implementation of the Plan, Plan Area residential population would increase from approximately 12,000 in 2010 to 37,500, by 2040, the analysis horizon year. This represents an increase of 213 percent. Additionally, employment is projected to grow from about 45,600 under existing conditions to approximately 109,200 by 2040, an increase of 139 percent. The combined population-employment ("service population") increase with implementation of the Plan, would therefore be approximately 154 percent ([37,500 + 109,200] ÷ [12,000 + 45,600] = 2.54, or an increase of 154 percent from existing). Based on output from the County Transportation Authority travel demand model, daily VMT to and from the Plan Area would increase by approximately 77 percent by 2040, from approximately 987,000 to about 1.751 million" (p. IV.F-33).

The use of 2010 population and traffic projections to determine the Plan's incremental net increase in criteria air pollutants is inadequate, as it does not accurately represent the current baseline conditions within the Plan area. As stated by the BAAQMD in their 2009 Justification Report, the use of outdated population growth estimates can result in inconsistencies within a Plan's air quality analysis.[2] Therefore, by relying upon baseline data that is more than five years old, the Plan's air quality impact is inadequately evaluated.

Not only does the DEIR rely upon outdated traffic and population projections to determine the Plan's air quality impact, but it also fails to consider recent changes in the Plan area's air quality and pedestrian safety. According to the Sustainable Communities Health Assessment conducted for the proposed Plan, "due to close proximity to freeways and high traffic roads, the area has some of the poorest air quality

[2] Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance, BAAQMD, 2009, *available at:* http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en

in the City, with 13% of households living in an area exposed to greater than 10 µg/m^3 of fine particulate matter (PM 2.5) and 16% living in areas with ambient air pollution cancer risks greater than 100 in a million" (p. 2). The report continues on to state that while "residents in the Plan area own fewer cars, drive less, and spend more time walking and cycling," the area still has "among the highest densities of traffic in the city" (p. 3). The report also indicates that the Plan area's current pedestrian injuries and traffic congestion are among the highest in the city, stating,

> "The incidence of severe injuries and deaths related to collisions between vehicles and pedestrians, cyclists, and other vehicles is amongst the highest in the City. The situation for pedestrians is especially troubling, as the average annual number of pedestrian injuries and fatalities per 100 road miles is six times higher in the Plan area compared to the City as a whole (48 vs. 8). Compared to other neighborhoods, the Plan area also has a higher proportion of drivers who are driving over the speed limit. While more residents who live in the Plan area may not be driving themselves, the traffic density, a general proxy for adverse environmental exposures and health hazards from traffic, is among the highest in the City due to the large arterials that carry traffic to and from freeways. Additionally, 100% of the current population in the plan area lives within 150 meters of a designated truck route (research suggests that the concentration of emitted motor vehicle pollutants may be highest within 150 meters of roadways)" (p. 3).

O-CSN-1.56 (cont'd.)

As you can see in the excerpt above, the Plan area's current air quality, traffic conditions, and pedestrian safety are among the worst in the city – something that the DEIR fails to address or even consider when evaluating the Plan's air quality impact. Once implemented, the Central SoMa Plan, which proposes to develop 17,280,000 square feet of residential uses, 10,430,000 square feet of office uses, and 4,007,000 square feet of retail and other uses, will only exacerbate these already significant health and environmental issues (Table VI-1, p. VI-3, pp. 627). Therefore, we find the DEIR's conclusion of a less than significant air quality impact to be incorrect, and maintain that the Plan would have a significant air quality impact, as our analysis provides substantial evidence to support this significance determination.

Failure to Consider Impacts from Other Projects Within the Area

Not only does the DEIR rely upon outdated baseline data to determine the Plan's air quality impacts, but it also fails to account for impacts from other development projects within the area. As a result, the Plan's net increase in criteria air pollutants within the area, as well as it's cumulative air quality impact, are misrepresented.

O-CSN-1.57

CU-3

The proposed Pier 70 Mixed-Use District Project, which is adjacent to the Central SoMa Plan area, comprises a project site of an approximately 35-acre area bounded by Illinois Street to the west, 20th Street to the north, San Francisco Bay to the east, and 22nd Street to the south.[3] The project site

[3] Pier 70 Mixed-Use District Project DEIR, p. 2.1-2.2, *available at:* http://sf-planning.org/environmental-impact-reports-negative-declarations

contains two development areas: the 28-Acre Site and the Illinois Parcels. Development of the 28-Acre Site would include up to a maximum of approximately 3,422,265 gross square feet (gsf) of construction in new buildings and improvements to existing structures (excluding square footage allocated to accessory parking). Development of the Illinois Parcels would include up to a maximum of approximately 801,400 gsf in new buildings; these new buildings would not exceed a height of 65 feet, which is the existing height limit along Illinois Street on both the Port-owned and the western portion of the Hoedown Yard.

According to the Pier 70 Mixed-Use District Project's DEIR, the Pier 70 Project would result in ten significant and unavoidable impacts. "It would:

- Cause one individual Muni route (48 Quintara/24th Street bus routes) to exceed 85 percent capacity utilization in the a.m. and p.m. peak hours in both the inbound and outbound directions;
- Cause loading demand during the peak loading hour to not be adequately accommodated by proposed on-site/off-street loading supply or in proposed on-street loading zones, which may create hazardous conditions or significant delays for transit, bicycles, or pedestrians;
- Contribute considerably to significant cumulative transit impacts on the 48 Quintara/24th Street and 22 Fillmore bus routes;
- Cause a substantial temporary or periodic increase in ambient noise levels during construction in the project vicinity above levels existing without the project;
- Cause substantial permanent increases in ambient noise levels in the project vicinity (22nd Street [east of Tennessee Street to east of Illinois Street]; and Illinois Street [20th Street to south of 22nd Street]);
- Combine with cumulative development to cause a substantial permanent increase in ambient noise levels in the project vicinity (22nd Street [east of Tennessee Street to east of Illinois Street] and Illinois Street [20th Street to south of 22nd Street]);
- Generate fugitive dust and criteria air pollutants during construction, which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants;
- Result in operational emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants; and
- Combine with past, present, and reasonably foreseeable future development in the project area to contribute to cumulative regional air quality impacts."[4]

O-CSN-1.57 (cont'd.)

As you can see in the excerpt above, the Pier 70 Project would result in significant and unavoidable impacts to air quality, pedestrian safety, and traffic. These significant and unavoidable impacts, combined with the proposed Plan's significant air quality, pedestrian safety, and traffic impacts, would

[4] Pier 70 Mixed-Use District Project DEIR, p. S.5-S.6, *available at:* http://sf-planning.org/environmental-impact-reports-negative-declarations

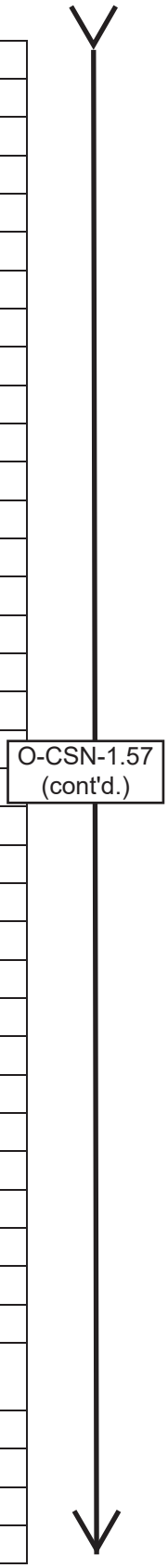
result in significant and unavoidable cumulative air quality, pedestrian safety, and traffic impacts, something that the DEIR fails to adequately address. In addition to the Pier 70 Project, there are approximately 72 additional development projects in San Francisco that are currently being considered by the Planning Commission, some of which would also contribute to the Plan's already significant impacts (see table below).[5]

List of Major Development Projects in San Francisco	
Project	**Address**
1629 Market Street Mixed-Use Project	1629 Market Street
1027 Market Street Project	1028 Market Street
950-974 Market Street Project	950-974 Market Street
One Oak Street Project	1500-1540 Market Street
1499 Mission Street Project	1500 Mission Street
299 Grant Avenue Project	300 Grant Avenue
1000 Van Ness Avenue Project	1001 Van Ness Avenue
1269 Mission Street Project	1270 Mission Street
India Basin Mixed-use Project	700-900 Innes Avenue
1979 Mission Street Mixed-Use Project	1979 Mission Street
901 16th Street & 1200 17th Street Project	901 16th Street & 1200 17th Street
1828 Egbert Avenue Project	1828 Egbert Avenue
Better Market Street Project	Market Street & Octavia Boulevard
Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project	East of US-101
1065 Market Street Project	1066 Market Street
240-290 Pacific Avenue / 720 Battery Street Project	240-290 Pacific Avenue / 720 Battery Street
837 Pacific Avenue Project	838 Pacific Avenue
2293-2299 Powell Street/309-311 Bay Street Project	2293-2299 Powell Street/309-311 Bay Street
Golden State Warriors Event Center and Mixed-Use Development	Mission Bay Blocks 29-32
1601 Mariposa Street Mixed Use Project	1602 Mariposa Street
400 Bay Street Hotel Project	401 Bay Street
1074 Market Street Project	1075 Market Street
5M Project	925-967 Mission Street
Jewish Home of San Francisco	302 Silver Avenue
525 Harrison Street (Case No. 2000.1081E; State Clearinghouse No. 1984061912)	525 Harrison Street
West Wing Project	501 Tunnel Avenue
75 Howard Street Project	75 Howard Street
949 Gough Street Project	950 Gough Street
1546-1564 Market Street Project	1546-1564 Market Street

O-CSN-1.57 (cont'd.)

[5] http://sf-planning.org/environmental-impact-reports-negative-declarations

100 Hyde Street Project	101 Hyde Street
1499 Mission Street Project	1500 Mission Street
Mason and Turk Residential Mixed-Use Project	19-25 Mason Street
2501 California Street Project	2501 California Street
800 Indiana Street Project	800 Indiana Street
689 Market Street Project	690 Market Street
109 The Embarcadero/115 Steuart Street Project	110 The Embarcadero/115 Steuart Street
1480 Post Street/ 1333 Gough Street Project	1481 Post Street/ 1333 Gough Street
1527-1545 Pine Street Mixed-Use Project	1527-1545 Pine Street
1634-1690 Pine Street Project	1634-1690 Pine Street
Seawall Lot 337 and Pier 48 Mixed-Use Project	Pier 48 & Seawall Lot 37
465 Tehama/468 Clementina Street Project	465 Tehama/468 Clementina Street
651-655 Dolores Street Project	651-655 Dolores Street
199 Paul Avenue Project	200 Paul Avenue
74 Howard Street Project	75 Howard Street
200-214 6th Street Project	200-214 6th Street
1784 15th Street Project	1785 15th Street
927 Toland Street Project	928 Toland Street
The Mexican Museum and Residential Tower Project	706 Mission Street
100 Polk Street Project	101 Polk Street
344 Brannan Street Project	345 Brannan Street
248-252 9th Street Project	248-252 9th Street
Seawall Lot 351 Project	8 Washington Street
801 Brannan and One Henry Adams Streets Project	801 Brannan & 1 Henry Adams Streets
1320 Mission Street Project	1321 Mission Street
2550-2558 Mission Street Project	2550-2558 Mission Street
1510-1540 Market Street Project	1510-1540 Market Street
Strand Theater	1127 Market Street
479 Potrero Avenue Project	480 Potrero Avenue
2894 San Bruno Avenue Project	2895 San Bruno Avenue
751 Carolina Street Project	752 Carolina Street
1000-1020 Broadway & 1629 Taylor Street Project	1000-1020 Broadway & 1629 Taylor Street
Chinese Hospital Replacement Project	835–845 Jackson Street
3151-3155 Scott Street Project	3151-3155 Scott Street
Booker T. Washington Community Center Mixed Use Project	800 Presidio Avenue
Restaurant Depot	2121 and 2045 Evans Street
2001 Market Street Mixed-Use Development	2001 Market Street
748 Wisconsin Street Project	749 Wisconsin Street
221 Second Street Project	222 Second Street



49 First Street Project	50 First Street
739 Washington Street Project	740 Washington Street
690 Stanyan Street (Mixed Residential/Retail Project)	690 Stanyan Street
255 Seventh Street Project	255 Seventh Street

O-CSN-1.57 (cont'd.)

Our analysis demonstrates that the proposed Plan, in combination with the various development projects currently being considered by the City, would result in a cumulatively considerable significant air quality, pedestrian safety, and traffic impact. As a result, we find the DEIR's conclusion of a less than significant air quality impact to be incorrect, and maintain that the proposed Plan, in combination with other development projects within the area, would have a significant impact on local and regional air quality.

Reduced Heights Alternative Would Reduce Plan's Significant Impacts

As discussed in the sections above, our analysis demonstrates that the Plan would have a significant impact on air quality, pedestrian safety, and traffic. Therefore, in an effort to reduce these impacts to a potentially less than significant level, alternatives to the Plan should be considered.

O-CSN-1.58

AL-2

The Reduced Heights Alternative, for example, would permit fewer tall buildings south of the elevated Interstate 80 freeway than would be allowable under the Plan (p. VI-16). The Reduced Heights Alternative would include the same street network changes and open spaces improvements that are proposed under the Plan. This alternative assumes the same sites would be developed as under the Plan, although at a lower intensity, resulting in marginally less development than that assumed under the Plan. Growth projections for the Reduced Heights Alternative estimate an increase of 12,400 households and approximately 55,800 jobs, reflecting 14 percent fewer households and 12 percent fewer jobs than the Plan. Total floor area developed under the Reduced Heights Alternative would be about 13 percent less than with implementation of the Plan (see table below) (p. VI-3, VI-16).

TABLE VI-1 DEVELOPMENT ASSUMPTIONS FOR ALTERNATIVES TO THE CENTRAL SOMA PLAN

	Central SoMa Plan[a]	No Project Alternative	Reduced Heights Alternative	Modified TODCO Plan	Land Use Variant
Household Growth (Increase from Baseline)[b]	14,400	9,200	12,400	12,700	12,900
Difference from Plan	–	(5,200)	(2,000)	(1,700)	(1,500)
Population Growth (Increase from Baseline)[c]	25,500	16,300	21,900	22,500	22,800
Difference from Plan	–	(9,200)	(3,600)	(3,000)	(2,700)
Residential Square Feet (Increase from Baseline)	17,280,000	10,800,000	14,880,000	15,240,000	15,480,000
Difference from Plan	–	(6,480,000)	(2,400,000)	(2,040,000)	(1,800,000)
Employment Growth (Jobs) (Increase from Baseline)	63,600	27,200	55,800	56,700[d]	66,200
Difference from Plan	–	(36,400)	(7,800)	(6,900)	2,600
Office Square Feet (Increase from Baseline)	10,430,000	5,000,000	9,151,000	9,299,000[e]	10,857,000
Difference from Plan	–	(5,430,000)	(1,279,000)	(1,131,000)	427,000
Non-Office Square Feet (Increase from Baseline)	4,007,000	1,900,000	3,515,000	3,572,000[d]	4,171,000
Difference from Plan	–	(2,107,000)	(492,000)	(435,000)	164,000

SOURCES: San Francisco Planning Department, 2013, 2016; TODCO, 2013; ESA, 2016.

NOTES:

Values rounded to nearest 100; some columns and rows do not add due to rounding.

Values in parentheses represent a reduction from the Plan.

The Land Use Plan Only Alternative would have the same growth and building development characteristics as that presented for the Plan in this table. See text for additional discussion.

a. The 2016 Central SoMa Plan is contained entirely within the boundaries of the 2013 draft Plan Area. The Department analyzed projected growth in employment and residential uses for the 2013 draft Plan and determined that 95 to 97 percent of this projected growth is anticipated to occur in the 2016 draft Plan Area. Thus, the numbers presented in this table, are conservative (i.e., higher) and would not substantively alter the conclusions reached in this EIR. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study.

b. Assumes 95 percent occupancy of housing units.

c. Assumes 1.77 persons per household.

d. Based on same factors as in Planning Department projections.

e. From TODCO Plan, p. 9, with addition of Planning Department projected growth north of Folsom Street (primarily in C-3 use districts).

O-CSN-1.58 (cont'd.)

As you can see in the excerpt above, the Reduced Heights Alternative would have 14 percent fewer households, 12 percent fewer jobs, and would have a total floor area of about 13 percent less than the proposed Plan. This slight decrease in development would reduce the Project's traffic, air quality, and pedestrian safety impacts, and in some cases, this Alternative would reduce the Plan's significant impacts to a less than significant level. For example, as stated in the DEIR, the Reduced Heights Alternative would reduce the Plan's transit ridership by about eight percent (p. VI-24). This relative reduction in ridership would avoid the Plan's significant impact on Muni capacity utilization on some screenlines and corridors under existing plus Plan and 2040 cumulative conditions (p. VI-24). Similarly, in terms of pedestrian and bicycle operations, the Reduced Heights Alternative would result in about eight percent less travel by these modes in 2040, compared to the Plan, and would implement the same proposed street network changes, including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks (p. VI-25). With incrementally less development in the Plan Area by 2040, the Reduced Heights Alternative would significantly reduce the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions. Bicycle travel would also be incrementally less frequent under the Reduced Heights Alternative, compared to conditions with the Plan, and the facilities that would be provided would be similar (p. VI-25).

The Reduced Heights Alternative would result in less growth in demand for off-street freight loading spaces, on-street commercial loading spaces, and curb space for passenger loading/unloading zones, and would reduce the Plan's parking demand by 10 percent (p. VI-25, VI-26). Furthermore, the construction activities for this Alternative would be less intensive than the proposed Plan, due to the fewer tall buildings that would be constructed (p. VI-26). This reduction in construction activities would significantly reduce the air quality and traffic impacts when compared to the proposed Plan. Finally, as stated in the DEIR, "emissions of criteria air pollutants, GHGs, and traffic-generated TACs would be incrementally reduced within the Plan Area, compared to those with the Plan, because the Reduced Heights Alternative would result in about 14 percent less residential growth and about 12 percent less employment growth in the Plan Area by 2040 than is assumed under the Plan" (p. VI-27, VI-28). A summary of the impacts and percent reduction (if applicable) the Alternative would result in are provided in the table below.

Reduced Heights Alternative Impact Reductions	
Impact	**Percent Reduction from Proposed Plan**
Transit Ridership	*(8%)*
Pedestrian and Bicycle Operations	*(8%)*
Pedestrian Crowding in Crosswalks	*Significantly Reduced*
Bicycle Travel	*Significantly Reduced*
Demand for Off-Street Freight Loading Spaces	*Significantly Reduced*
On-Street Commercial Loading Spaces	*Significantly Reduced*
Curb Space for Passenger Loading/Unloading Zones	*Significantly Reduced*
Parking Demand	*(10%)*
Construction Activities	*Significantly Reduced*
Emissions of Criteria Air Pollutants, Greenhouse Gases (GHGs), and Traffic-Generated Toxic Air Contaminants (TACs)	*Significantly Reduced*

O-CSN-1.58 (cont'd.)

Our analysis demonstrates that the Reduced Heights Alternative would significantly reduce many of the Plan's air quality, traffic, and pedestrian safety impacts. While this Alternative proposes less development, it would still satisfy all of the Plan's eight goals. In fact, due to the Reduced Heights Alternative's reductions in air quality, traffic, and pedestrian safety impacts, it can be reasonably assumed that this alternative would better satisfy these eight goals when compared to the proposed Plan. This Alternative would still "increase the capacity for jobs and housing," but would better "provide safe and convenient transportation that prioritizes walking, bicycling, and transit," and would create a more "environmentally sustainable and resilient neighborhood" when compared to the proposed Plan (p. II-5, II-6). Due to these reasons, we find that implementation of the Reduced Heights Alternative would significantly reduce the Plan's air quality, traffic, and pedestrian safety impacts, and would better satisfy the Plan's goals and objectives. Therefore, this Alternative should be considered in an updated DEIR in order to reduce the severity of the Plan's significant and unavoidable impacts.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Jessie Jaeger

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Newport Beach, California 92660
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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certification:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – present;
- Senior Environmental Analyst, Komex H2O Science, Inc (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of numerous environmental impact reports under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions and geologic hazards.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a comunity adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the dischrge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt currently teaches Physical Geology (lecture and lab) to students at Golden West College in Huntington Beach, California.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

JESSIE MARIE JAEGER

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Los Angeles CA, 90049

530-867-6202
jaegerjessie600@gmail.com

SUMMARY

Innovative, energetic, driven, and a results oriented leader, with proven success producing quality results in research, student government, and academia. A recipient of the UCLA Bruin Advantage Scholarship, Dean's List honoree, and a leader amongst peers, who uses ambition and passion to effectively develop the skills needed to assess and solve major environmental and conservation issues.

Skills include:

- Execution of Laboratory Techniques (DNA extraction, Tissue Cataloging etc.)
- Understanding of Statistical Models used in Ecology and Conservation Biology
- Experience with programs such as Excel, Microsoft Access, QuickBooks, ArcGIS, AERMOD, CalEEMod, AERSCREEN, and ENVI
- Knowledge of California policies and municipal codes
- Experience in Field Work, including capture of Amphibian species and water sampling within Ballona Watershed
- Steering Committee Coordination and Working Group Management
- Organizational Skills
- Effective Communication Abilities
- Customer Service Experience

PROFESSIONAL EXPERIENCE

SOIL WATER AIR PROTECTION ENTERPRISE, SANTA MONICA, CA **2014 – Present**
SWAPE Technical Consultation, Data Analysis, and Litigation Support

Project Analyst
http://www.swape.com/staff/jessie-jaeger/
Maintain and update national public water system database through use of Microsoft Excel and Access. Other responsibilities include cancer risk assessment calculations, in depth research of environmental issues such as fracking, Leaking Underground Storage Tanks (LUST) and their associated funding programs, groundwater contamination, Proposition 65 formaldehyde test methods, polychlorinated biphenyl (PCB) contamination within schools, and environmental modeling using AERMOD, CalEEMod, AERSCREEN, and ArcGIS.

- Expert understanding of Microsoft Excel and Access, with the ability to manipulate, analyze, and manage large sets of data. Expertise include the creation of queries via Access, utilization of Pivot Tables and statistical functions within Excel, and proficiency in formatting large datasets for use in final reports.
- Mastery of modeling programs such as CalEEMod, AERSCREEN, ArcGIS, as well as the ability to prepare datasets for use within these programs. For example, the conversion of addresses into geographical coordinates through the utilization of Geocode programs.
- Experience in the composition and compilation of final analytical reports and presentations, with proficiency in technical writing, organization of data, and creation of compelling graphics.
- Knowledge of federal and California EPA policies, such as CEQA, accepted methods, and reporting limits, as well as experience with city and county personnel and municipal codes.

UCLA H. BRADLEY SHAFFER LAB, LOS ANGELES, CA **2012 – 2014**

Undergraduate Research Assistant
Responsible for phylogenetic prioritization within the Turtles of the World project (TOTW). Methods include obtaining 2-3 tissue samples of every species of turtle on earth, and sequencing them for ~20 independent genes. The results of the TOTW project are being used to create a phylogenetic tree of as many currently existing turtle species as possible. This will allow evolutionary biologists and herpetologists to better understand how turtle taxa are interrelated, and will aid in efforts to conserve threatened turtle species.

- Expert understanding of laboratory techniques, including the amplification of DNA through the method of polymerase chain reactions (PCR), extraction of DNA from tissue, cataloging of tissue samples etc.
- Proficiency in programs such as Excel, Google Earth, and Specify.
- Mastery of laboratory equipment usage, including but not limited to, Thermocyclers, Centrifuges, Nanodrop Machines, Autoclave Devices, and Vortexes.
- Experience in fieldwork, including capture of salamander, turtle, and newt specimens to add to the Shaffer Lab tissue database.

LOS ANGELES REGIONAL COLLABORATIVE, LOS ANGELES, CA **2011-2012**
Climate Action and Sustainability, Institute of the Environment, UCLA

Work Group and Event Manager
Responsibility for organization of steering committee meetings, as well as for the organization of the working groups within the collaborative. Maintaining and updating the website, as well as sending out weekly newsletters on behalf of the Collaborative to its members.

- Organized the first Solar Planning working group within the steering committee, which consisted of representatives from universities, government agencies, and private sectors within LA County.
- Coordinated monthly steering committee meetings as well as assisted in the organization of Quarterly Meetings and Sustainability Forums.
- Managed membership, weekly newsletters, website updates, general assistance, and clerical duties.

UNDERGRADUATE STUDENTS ASSOCIATION COUNCIL, UCLA **2012-2013**

Academic Wellness Director, Academic Affairs Commissioner (2013)
Student Groups Support Committee Member, Internal Vice President (2012)
USAC's programs offer an invaluable service to the campus and surrounding communities by providing an opportunity for thousands of students to participate in and benefit from these services. Two to three thousand undergraduates participate annually in the more than 20 outreach programs.

- Directed the organization of academic campus programs that provide tools and resources to manage the academic rigors experienced by university students.
- Oversight control of and responsibility for the Academic Wellness committee and all its members.
- Created a Universal Funding application for student groups that facilitates the process of requesting funds to support philanthropic activities.

EDUCATION

Bachelor of Science, Environmental Science
Minor in Conservation Biology
Senior Project, Ballona Watershed Phytoplankton and Water Quality Assessment
University of California Los Angeles, Los Angeles, CA

High School Diploma
Valedictorian, June 2010
Pioneer High School, Woodland, CA

ACCOMPLISHMENTS

Recipient, Bruins Advantage Scholarship, 2010-2014
Academic Honoree, Dean's List, 2013-2014
Life Member, National Honor Society & California Scholarship Federation, 2006-2010
Valedictorian, Pioneer High School, 2010

EXHIBIT C

SMITH ENGINEERING & MANAGEMENT

February 13, 2017

Mr. Richard Drury
Lozeau Drury
410 12th Street, Suite 250
Oakland, CA 94607

Subject: Central SoMa Plan Project DEIR (SCN 2013042070 P17003

Dear Mr. Drury:

At your request, I have reviewed the Draft Environmental Impact Report (the "DEIR") for the Central SoMa Plan Project ("the Project") in the City and County of San Francisco (the "City"). My review is specific to the traffic and transportation section of the DEIR and its supporting documentation.

My qualifications to perform this review include registration as a Civil and Traffic Engineer in California and over 48 years professional consulting engineering practice in the traffic and transportation industry. I have both prepared and performed adequacy reviews of numerous transportation and circulation sections of environmental impact reports prepared under the California Environmental Quality Act (CEQA). I am very familiar with the Project area. My professional resume is attached.

Findings of my review are summarized below.

The Project May Not Be Eligible To Analyze Traffic Impacts Solely Under the VMT per Capita Metric

O-CSN-1.59
TR-3

The DEIR has attempted to evaluate Project traffic impacts solely under the Vehicle Miles Traveled (VMT) per Capita metric provision of SB 743, eschewing

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the conventional delay/Level of Service (LOS) analysis. The SB 743 regulations embodied in CEQA § 15064.3 specify that a land use plan may have a significant impact on transportation if it is not consistent with the relevant sustainable community strategy (SCS). To be consistent with the SCS, the development must lead to VMT equal to or less than the VMT per capita and VMT per employee specified in the SCS. *Plan Bay Area* is the relevant SCS (per DEIR page IV.D-36), and it sets the VMT per capita target at 10 percent below the 2005 Bay Area average. However, it does not set any target for VMT per employee (DEIR pages IV.D-21 and IV.D-36). Therefore, the City cannot claim that the development meets VMT targets per employee since there are none. Worse yet, the DEIR concludes that the Project will *increase* VMT per employee in the Project area from 8.2 to 8.7 in 2012 and from6.8 to 7.1 in 2040 (DEIR page IV.D-38) stating, *"With Plan implementation, VMT per capita would...increase slightly in the office category"*. Since the Project will increase VMT per employee in the study area, it does not comply with the terms of SB 743.

VMT Per Capita Generated in the Project Area Is an Incomplete Metric for Measuring Traffic Impacts in the Subject Plan Area

The VMT (vehicle miles traveled) per Capita (referring hereinafter to both VMT per unit population and VMT per employee as a single phrase while still recognizing that each has a separate rate) metric is a useful indicator when planning for a broad area or region, such as where generally identifying areas where development should be encouraged or discouraged, particularly when concentrating on considerations such as Air Quality pollutant and Greenhouse Gas emissions since these have a rather direct correlation to VMT. However, when planning for a discrete area, VMT per Capita as the sole traffic metric gives absolutely no indication when a plan has packed so much development into an area as to make the streets unlivable for bicyclists, pedestrians, motorists and their passengers and transit patrons alike - the VMT per Capita values will just stay the same or perhaps even improve (become lower) somewhat. To draw any some inference about how much development is sustainable based on VMT, Total VMT generated by the plan and total VMT experienced within the subject area must be considered.

O-CSN-1.59 (cont'd.)

DEIR Table IV-1 indicates that in the baseline (2010) condition, the Central SoMA population was 12,000, that in 2040 without the Project it would be 28,200, and in 2040 with the Project it would be 37,500. The same table also indicates that in the baseline year employment in Central SoMa was 45,600, that in 2040 without the Project it would be 72,800 and that in 2040 with the Project employment would be 109,200 jobs. At the VMT per capita rates disclosed in DEIR Table IV.D-6, the population and employment totals disclosed in DEIR Table 1V-1 would generate the following VMT totals in Central SoMa:

VMT Gen By	Baseline	2040 No Project	2040 With Project
Population	25,200	50,760	60,000
Employment	373,920	495,040	775,320
Total	399,120	545,800	835,320

As can be seen from the above compilations, the 2040 No Project scenario generates almost 37 percent more net VMT than the Baseline; the 2040 With Project scenario generates over 109 percent more net VMT than the Baseline and over 53 percent more than the 2040 No Project Scenario. Since the public knows from information presented in this DEIR and from other recent DEIR's for projects having transportation effects on the Central SoMa area that there are already problems impacting motor vehicle traffic, bicyclists, pedestrians, the safety of all of the aforementioned, and transit operations. In that situation adding development to the area that generates 109 percent more VMT than existing uses and 53 percent more VMT than development to 2040 under existing plans and zoning is significantly impactful on transportation

O-CSN-1.59 (cont'd.)

But even this is just the tip of the iceberg. As noted in the DEIR, the streets of the Central SoMa serve as a gateway between elements of the regional highway system and greater downtown San Francisco, Mission Bay, and the greater SoMa and nearby areas as well as thoroughfares for movements between these areas. To make judgments about the functionality of and livability around the streets of the Central SoMa, that burden of VMT must be quantified and assessed. The DEIR has considered neither the total VMT that would be generated in Central SoMa nor the other VMT that traverses it and therefore is inadequate.

The DEIR Has Actually Performed a Traffic LOS Analysis. But It Conceals the Detailed Findings From the Public

Ironically, the DEIR did perform a typical traffic LOS analysis of intersections and freeway ramps in the SoMa study area. It did so to calculate differences in *transit delay* under the various plan land use development alternatives and the alternative street configuration scenarios considered in the DEIR. However, other than a very generalized and non-location-specific summary of the LOS/delay study findings regarding what ordinarily would be considered traffic impacts that is presented at DEIR pages IV.D-41 through IV.D-43, it withholds from the public the location-specific measures of the severity of traffic impacts. We understand that elements of the San Francisco planning and political establishment (and others elsewhere) like eliminating traffic delay as a CEQA impact criteria because it eliminates the need to make findings of overriding significance about traffic impacts they have no intention of mitigating and avoids having to put up with the members of the public who actually care about traffic congestion and delay. However, CEQA requires that the Lead Agency make available all analyses that have been relied upon in the DEIR available for public

O-CSN-1.60

TR-5

review. It must do so with the details of the Highway Capacity Manual based LOS/delay analysis it performed to estimate transit delay.

What the generalized summary of the DEIR's studies of traffic delay under *Highway Capacity Manual* procedures shows is that:

- Within the Central SoMa transportation study area, 36 intersections were evaluated for the AM peak hour and 80 intersections for the PM peak hour.
- Five freeway off ramps and six freeway on-ramps from/to I-80 and I-280 were evaluated.
- With the Project traffic and the Howard/Folsom one-way street configuration option, in the AM peak, intersections experiencing delay levels at LOS E or worse (55 seconds or more average delay per vehicle) would increase from 3 of the 36 studied under the existing condition to 21 of 36. In the PM peak, with the Project and the Howard/Folsom one-way street configuration, the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 39 of 80 with the Project traffic and subject street configuration
- With the Howard/Folsom two-way street configuration option, in the AM peak, the number of intersections operating at LOS E or worse would increase from 3 of 36 in the existing condition to 17 of 36 with the plan and the subject street configuration. In the pm peak the number of intersections operating at LOS E or worse would increase from 19 of 80 in the existing condition to 37 of 80 with Project traffic and the two way street configuration.
- As to the freeway ramp analysis, 8 of the 11 ramps analyzed operate at vehicle densities of 35 passenger cars per mile per lane (volumes reflecting breakdown conditions) in the AM and/or PM peak in the existing condition. With the addition of Project related traffic and the proposed street network changes, 10 of the 11 ramps would operate at vehicle densities of 35 passenger cars per mile per lane in the AM and/or Pm peak hour.

The results of this analysis as generally summarized in the DEIR reflect a deterioration of operations on the study area street and freeway ramp system in the AM and PM peak hours that would ordinarily be considered significantly impactful. But the results as presented do not distinguish how much of the deterioration is due to traffic generated by the Project land uses, that due to the street configuration changes, and that due to land use and traffic growth in nearby areas.

O-CSN-1.60
(cont'd.)

The Transit Analysis is Based on Data Not Representative of Current Conditions

The DEIR's transit impact analysis relative to the capacity of the transit operations serving the area are reported on DEIR Tables IV.D-8, IV.D-9, IV.D-10, IV.D-18, IV.D-19 and IV.D-20, respectively on DEIR pages IV.D-45, IV.D-46, IV.D-48, IV.D-90, IV.D92- IV.D-94. By footnotes, the Tables are said to be based on the San Francisco Planning Department's Memorandum, *Transit Data for Transportation Impact Studies*, dated May 2015. However, if the referenced DEIR tables are compared to the ones in the subject SF Planning Department memo (actually dated May 15, 2015), the following things become evident:

- The tables are reformated to facilitate comparison of the existing ridership and capacity utilization condition to that when the added ridership of the Project is combined with the existing ridership - an entirely legitimate act.
- The existing ridership numbers are modified to correct very small addition errors in the transference of individual SF MUNI line counts to the screen line totals on the tables or addition errors on the tables themselves - again entirely legitimate.
- In tables IV.D-9 and IV.D-19, the SF MUNI data is reconfigured into screen lines that make more sense with respect to the Project area - again a legitimate action.
- The 2040 cumulative ridership data (the 2040 No Project data) in the DEIR is apparently compiled from a later run of San Francisco's travel model than that in the cited Planning Department memo - a legitimate act but one that should have been mentioned in the DEIR.
- The DEIR consultants actually updated the existing conditions ridership data for one regional transit service provider, BART, in 2016 -a legitimate and commendable action.
- The DEIR tables fail to reproduce footnotes on the original existing conditions tables from the cited SF Planning Department memo that indicate the actual collection date of the data and fail to enter footnotes that convey data dates indicated in the text of the cited memo - a misleading act that conceals the outdated nature of some of the existing conditions data.

O-CSN-1.61

GC-2

In fact, the cited San Francisco Planning Department memo makes clear that the SF MUNI data was collected in the Fall of 2013. Data on the ridership on the regional transit service providers is sourced by footnote to a secondary source document produced by the San Francisco Municipal Transportation Agency (SFMTA) in 2012. Ridership collected by the actual regional transit service providers obviously predates that document and is most likely collected in 2011 or earlier. Given the extent of changes affecting transit ridership demand that have taken place in San Francisco and the region since 2011 and 2013, no reasonable person can argue that the data employed in the transit ridership versus capacity impact analysis is representative of existing conditions.

The Regional Transit Analysis Is Also Flawed Because It Fails To Disclose System Deficiencies In San Francisco That San Francisco Development Should Take a Major Role In Mitigating

Over capacity deficiencies on BART are not limited to the Transbay Corridor line capacity which the DEIR does disclose. Platform capacity deficiencies also exist on BART at the Embarcadero and Montgomery stations - too many people attempting to board and alight on the platforms at the same time. This affects both the movements to and from the San Francisco Southwest corridor and Peninsula Corridor as well as the Transbay Corridor. The platform capacity deficiencies are fundamentally the result of development in San Francisco. This DEIR and other prior DEIRs in San Francisco are deficient in failing to disclose this impact and failing to propose effective measures to mitigate it.

O-CSN-1.62

TR-6

It Is Unclear What Recent and Concurrent Projects Are Included In the Transportation Analysis of the Existing and 2040 Project and No Project Analysis Scenarios

The DEIR fails to identify how or whether large recent and concurrent projects are included in the 2040 analyses. Examples concern such projects as the massive *Pier 70 Project*, the *Salesforce Tower*, the *Warriors Arena Project* and the *Project, additional development in Mission Bay* and many other projects near the Central SoMa. The DEIR must clarify how each project that is approved and recently occupied or approved but still under construction or still under review but at a stage of reasonable certainty is (or is not and why not) treated in the analysis

O-CSN-1.63

CU-3

The DEIR's Traffic Hazards Analysis (Impact TR-2) Is Contrary To Fundamental Engineering Principles

The DEIR Traffic Analysis runs contrary to fundamental engineering principles. It narrowly defines traffic hazard as "*a structure, object, or vegetation that obstructs, hinders, or impairs reasonable and safe view by drivers of other vehicles, pedestrians or bicyclists traveling on the same street and restricts the ability of the driver to stop the motor vehicle without danger of an ensuing collision.*" It acknowledges that "*new development under the plan would bring more people into the area, which would result in an increase in the potential for conflicts between vehicles, bicyclists and pedestrians,"* while explaining that "*conflicts are located where pedestrians, bicyclists, and/or drivers cross, merge, or diverge"*. However, it unreasonably claims that increases in the rate of potential for conflicts by itself does not represent a traffic hazard (as so narrowly defined by the DEIR).

O-CSN-1.64

TR-9

In fact, exposure to conflict is fundamental to defining accident hazard in engineering practice. Intersection accident rates and expected rates for the

intersection type are defined in crashes per million annual vehicle crossings (theoretically including, as defined in the California Vehicle Code, bicycles as a vehicle). Road segment accident rates are defined as crashes per million vehicle-miles. The reasons why incidence of conflict is directly related to incidence of conflict are many. Urban roads are normally designed to meet the various design standards cited in the DEIR at page IV.D-41 or, when they don't and result in high accident occurrence or particularly severe accidents are subjected to remedial measures. The principal reason for urban motor vehicle-motor vehicle, motor vehicle - bicycle, motor vehicle - pedestrian or bicycle - pedestrian collisions is actions or omissions on the part of the driver, bicyclist or pedestrian (the principals) or both parties. Increases in the incidence of conflicts such as the Project would cause increase the hazard that actions or omissions of the principals would occur at a conflict point, hence increasing crashes. For example, in traffic congested situations, all of the principals may take actions where the potential for crashes is increased. For instance, where there is heavy queuing and blockages, pedestrians and bicyclists may be induced to cross against the indications of the traffic signal. Drivers may be motivated to make sudden movements without considering all the possible conflicts (for example but not limited to, the driver attempting to make a right-turn-on-red that perceives a limited gap in oncoming traffic to their left that attempts to make the move without checking for the pedestrian entering the crosswalk on their right or the bicyclist overtaking them on their right). Other types of crash hazards that increase with conflict incidence are, but are not limited to ones involving the bicyclist or pedestrian oblivious to traffic conflicts because of music playing on their head phones or the pedestrian or driver focused on reading (or sending) text messages or e-mails on their smart phone. All these hazards clearly increase with the increase of incidence of conflicts, a product of motor vehicle, bike, and pedestrian volumes. These are ultimately a function of the intensity of resident and employment population in the Project area. The DEIR is flat wrong in concluding that increased potential for conflict does not represent a hazard in the study area, especially when the areas of conflict are also areas of undisclosed increases in traffic congestion that intensify the failure to perceive the conflict or induce behavior that results in crashes.

O-CSN-1.64
(cont'd.)

The DEIR is further unreasonable and unsupported in its assertion on page IV.D-41 that street network changes would reduce the potential for conflicts to the extent that it would reduce the incidence of conflict to levels such that would make the traffic hazards of implementation of the plan less than significant. It has conducted no analysis of conflict incidence with and without the Plan Project and with and without the Project's purported roadway improvements. In fact, it has not relied in any way on the statistical records of accidents by location, type, movement pattern, and participant actions and impairments that are readily

available to the City[1]. The entire analysis on this topic is inadequate and must be revised and recirculated in draft status.

O-CSN-1.64 (cont'd.)

The DEIR's Emergency Vehicle Impact Analysis Is Unreasonable In the Face of Facts Disclosed Elsewhere in the DEIR

The DEIR asserts without foundation that although traffic congestion would occur, that the California Vehicle Code requires that other motor vehicles get out of the way of emergency vehicles and because emergency vehicles primarily use arterial streets where there is purportedly room to get out of the way of emergency vehicles, despite the fact that the DEIR admits there would be increased traffic congestion with the Project, it asserts without sound foundation that there would be no significant impact on emergency vehicle traffic. This assertion is inconsistent with the information in the DEIR's traffic impact analysis at DEIR pages IV.D-41 through 43 which indicate that:

- With the Project, 10 of 11 freeway ramps serving the Project area would be at "breakdown levels" during the AM and/or PM peak periods. Breakdown levels on the on ramps causes extensive queuing on City surface streets that would impair emergency vehicle traffic even on arterials because other drivers may not have the room to comply with the Vehicle Code and get out of the way quickly. "Breakdown levels" on the off ramps involves queues onto the freeway mainlines. The confined ramps provide motorists little opportunity to comply with the vehicle code and get out of the way and motorists at the critical ramp exit points will not even know that an emergency vehicle is coming until it has slowly worked its way toward the head of the exit queue.
- With the Project, up to 21 of the 36 study area intersections that were analyzed for the AM peak hour and up to 39 of the 80 study area intersections that were analyzed for the PM peak hour are reported to experience highly deficient delay conditions. At these traffic delay levels that imply significant queuing, even on arterial width roadways, traffic is likely to be too congested to comply with the Vehicle Code mandate to get out of the way of emergency vehicles.

The DEIR's unsubstantiated and conclusory statements about emergency vehicle access impacts of the Project must be revised and made consistent with findings made elsewhere in the DEIR.

O-CSN-1.65

TR-12

[1] We refer to the Statewide Integrated Traffic Records System (SWITRS) in which the California Highway Patrol receives all traffic reports from all jurisdictions in the state and produces summaries by jurisdiction, by road segment and intersection location, by types of vehicle involved, movements, and causal factors including operator impairments or road deficiencies.

Conclusion

This concludes my current comments on the Central SoMa Plan Project DEIR. For the reasons stated above, the traffic analysis is inadequate and revised transportation analyses should be performed. Results should be recirculated in draft status for a full 45 day review period.

O-CSN-1.66

TR-2

Sincerely,

Smith Engineering & Management
A California Corporation



Daniel T. Smith Jr., P.E.
President

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Attachment 1
Resume of Daniel T. Smith Jr., P.E.

SMITH ENGINEERING & MANAGEMENT

DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present. President.
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.
Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21'st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

Transportation Centers. Project manager for Daly City Intermodal Study which developed a $7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al*. Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard et al., U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

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EXHIBIT D

Shawn Smallwood, Ph.D.
3108 Finch Street
Davis, CA 95616

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

12 February 2017

RE: Central SoMa Plan DEIR

Dear Ms. Gibson,

I write to comment on the Central SoMa Plan DEIR (San Francisco Planning Department 2016), which I understand is to cover development on 230 acres of residential and commercial use, including eight buildings between 200 feet and 400 feet high.

My qualifications for preparing expert comments are the following. I earned a Ph.D. degree in Ecology from the University of California at Davis in 1990, where I subsequently worked for four years as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, habitat restoration, interactions between wildlife and human infrastructure and activities, conservation of rare and endangered species, and on the ecology of invading species. I have authored numerous papers on special-status species issues, including "Using the best scientific data for endangered species conservation," published in Environmental Management (Smallwood et al. 1999), and "Suggested standards for science applied to conservation issues" published in the Transactions of the Western Section of The Wildlife Society (Smallwood et al. 2001). I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and the Raptor Research Foundation, and I've been a part-time lecturer at California State University, Sacramento. I was also Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management.

I have performed wildlife surveys in California for thirty-two years. Over these years, I studied the impacts of human activities and human infrastructure on wildlife, including on golden eagle, Swainson's hawk, burrowing owl, mountain lion, San Joaquin kangaroo rat, and other species. I have performed wildlife surveys at many proposed project sites. I have also performed hundreds of hours of diurnal and nocturnal flight behavior surveys of birds and bats. I also collaborate with colleagues worldwide on the underlying science and policy issues related to anthropogenic impacts on wildlife.

My CV is attached.

BIOLOGICAL IMPACTS ASSESSMENT

The DEIR did not include an analysis of impacts and mitigation on biological resources. One of the key arguments for the DEIR's omission of a biological resources impacts assessment was given in the Initial Study (page 125), "*The occasional areas of ruderal, or weedy, vegetation generally provide habitat only for species habituated to urban life and high disturbance levels*." The argument is that because the site is already urbanized and because the wildlife species that occur there are adapted to urban conditions, the proposed project poses no potential adverse impacts to wildlife. Using this logic, however, there would be no reason to perform biological resource assessments for any proposed projects in California because one can readily find anthropogenic conditions to which local species might have habituated. Whether species of wildlife might have habituated to local conditions is a contrived standard and not one that appears in CEQA, the CEQA guidelines, or in the judicial record.

A second key argument for omitting a biological resources impacts assessment was the Initial Study's assertion (page 126), that "*...none of the reported occurrences of species documented in the CNDDB* [California Natural Diversity Data Base] *are within the Plan area*." The Initial Study, and now the DEIR, inappropriately relies on CNDDB to screen special-status species for occurrence likelihood. CNDDB is useful only for confirming the presence of a species, but cannot be used to conclude absence because the reporting to CNDDB is voluntary and not based on scientific sampling or equal access to properties. The limitations of CNDDB are well-known, and they are summarized in a warning presented by CDFW on the CNDDB web site (https://www.wildlife.ca.gov/Data /CNDDB/About): "*We work very hard to keep the CNDDB and the Spotted Owl Database as current and up-to-date as possible given our capabilities and resources. However, we cannot and do not portray the CNDDB as an exhaustive and comprehensive inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of our customers...*" Lack of CNDDB records on the project area is an invalid reason for omitting the biological resources assessment.

O-CSN-1.67

BI-1

In other words, the reason for omitting a biological impacts assessment is that the Initial Study concluded: (1) There would be no significant impacts to wildlife caused by the construction of multiple high-rise and low-rise buildings, (2) There is no substantial change in conditions between the project reviewed in the 2013 Initial Study and the new project reviewed in the 2016 DEIR, and (3) The individual building projects would adhere to the San Francisco Planning Department's (2011) building design guidelines. The first reason is flawed because the Initial Study incorrectly used CNDDB and incorrectly assumed that habituated wildlife will be safe wildlife in the face of transparent and reflective building facades. The second reason is flawed because the new project is obviously very different from the project that was subjected to the 2013 Initial Study. The buildings are much taller. The third reason is more compelling, but it still does not justify omission of a biological resources impacts assessment in the DEIR. The DEIR needs to include reasonable predictions of likely bird-window collision fatality rates. The discussion needs to be had about how many birds of special-status species and species protected by the International Migratory Bird Treaty Act are likely to

perish each year after these high-rises are thrust into the aerial habitat space of migrating and resident birds.

A quick review of eBird (http://ebird.org/ebird/explore) revealed 12 August 2016 nocturnal visits on the project site by special-status species including yellow warbler, brown pelican, and California gull, as well as multiple other species protected by the International Migratory Bird Treaty Act. A review of eBird also reveals the use of the area by many species of bird, including additional special-status species such as double-crested cormorant, tricolored blackbird, Peregrine falcon and Cooper's hawk. The eBird records reveal what any biologist should expect of San Francisco, and that is the use of the peninsula as a migration route by many species of bird. Building glazed or glass-façaded high-rises in the middle of this migration route will obviously destroy many migrating birds, and those birds not colliding with the buildings will have to exert extra energy during migration to fly around the buildings.

Beginning on page 129, the Initial Study discusses bird collisions with windows, inappropriately citing the San Francisco Planning Department's 2011 Standards for Bird Safe Buildings as the source of the estimated annual 100 million to 1 billion birds killed by windows across the USA. In fact, this estimate comes from Klem (1990), which was based on extremely limited survey effort and multiple assumptions and is likely long since obsolete (more on this later). Whereas the Initial Study discusses the bird-window collision issue, its conclusions about the likely impacts are inconsistent with the Precautionary Principle in risk assessment and unrealistic, and therefore do not justify the omission of a biological resources assessment in the DEIR. If anything, the discussion of bird-window collisions in the Initial Study should have prompted a focused and much-expanded biological resources assessment in the DEIR.

O-CSN-1.67 (cont'd.)

The existing developed area is causing significant numbers of injuries and deaths of birds every year. For example, if there are homes or commercial buildings with windows, then there are ongoing impacts to birds. Window collisions are often characterized as either the second or third largest source or anthropogenic-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. However, these estimates and their interpretation warrant examination because they were based on opportunistic sampling, volunteer study participation, and fatality monitoring by more inexperienced than experienced searchers.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated

more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

Homes with birdfeeders are associated with higher rates of window collisions than are homes without birdfeeders (Kummer and Bayne 2015, Kummer et al. 2016a), so the developed area might pose even greater hazard to birds if it includes numerous birdfeeders. Another factor potentially biasing national or North American estimates low was revealed by Bracey et al.'s (2016) finding that trained fatality searchers found 2.6× the number of fatalities found by homeowners on the days when both trained searchers and homeowners searched around homes. The difference in carcass detection was 30.4-fold when involving carcasses volitionally placed by Bracey et al. (2016) in blind detection trials. This much larger difference in trial carcass detection rates likely resulted because their placements did not include the sounds that typically alert homeowners to actual window collisions, but this explanation also raises the question of how often homeowner participants with such studies miss detecting window-caused fatalities because they did not hear the collisions.

O-CSN-1.67 (cont'd.)

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) were able to incorporate many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only two of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on

anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

The existing conditions – the developed area – is undoubtedly killing many birds each year. Not only are windows killing many birds, but so too are house cats, feral cats, electrocution distribution lines, electric power poles, and autos. This said, the proposed project will add a level of impact that is entirely missing from the CEQA review. Constructing buildings to 400 feet above ground will not only take aerial habitat from birds, but it will also interfere with the movement of birds in the region and it will result in large numbers of annual window collision fatalities.

O-CSN-1.67 (cont'd.)

High-rise buildings intercept many nocturnal migrants as well as birds flying in daylight. Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager at al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building facades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building facades. From 24 days of survey over 48 day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities. There is ample evidence available to support my prediction that the proposed 200-foot to 400-foot tall buildings will result in many collision fatalities of birds.

COLLISION FACTORS

Below is a list of collision factors I found in the scientific literature. Following this list are specific notes and findings taken from the literature and my own experience.

(1) Inherent hazard of a structure in the airspace used for nocturnal migration or other flights
(2) Window transparency, falsely revealing passage through structure or to indoor plants

(3) Window reflectance, falsely depicting vegetation, competitors, or open airspace
(4) Black hole or passage effect
(5) Window or façade extent, or proportion of façade consisting of window or other reflective surface
(6) Size of window
(7) Type of glass
(8) Lighting, which is correlated with window extent and building operations
(9) Height of structure (collision mechanisms shift with height above ground)
(10) Orientation of façade with respect to winds and solar exposure
(11) Structural layout causing confusion and entrapment
(12) Context in terms of urban-rural gradient, or surrounding extent of impervious surface vs vegetation
(13) Height, structure, and extent of vegetation grown near home or building
(14) Presence of birdfeeders or other attractants
(15) Relative abundance
(16) Season of the year
(17) Ecology, demography and behavior
(18) Predatory attacks or cues provoking fear of attack
(19) Aggressive social interactions

O-CSN-1.67 (cont'd.)

(1) Inherent hazard of structure in airspace.—Not all of a structure's collision risk can be attributed to windows. Overing (1938) reported 576 birds collided with the Washington Monument in 90 minutes on one night, 12 September 1937. The average annual fatality count had been 328 birds from 1932 through 1936. Gelb and Delacretaz (2009) and Klem et al. (2009) also reported finding collision victims at buildings lacking windows, although many fewer than they found at buildings fitted with widows.

(2) Window transparency.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the transparency of glass used in windows on the buildings (Klem 1989). Gelb and Delacretaz (2009) felt that many of the collisions they detected occurred where transparent windows revealed interior vegetation.

(3) Window reflectance.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the reflectance of glass used in windows on the buildings (Klem 1989). Reflectance can deceptively depict open airspace, vegetation as habitat destination, or competitive rivals as self-images (Klem 1989). Gelb and Delacretaz (2009) felt that many of the collisions they detected occurred toward the lower parts of buildings where large glass exteriors reflected outdoor vegetation. Klem et al. (2009) and Borden et al. (2010) also found that reflected outdoor vegetation associated positively with collisions.

(4) Black hole or passage effect.—Although this factor was not often mentioned in the bird-window collision literature, it was suggested in Sheppard and Phillips (2015). The black hole or passage effect is the deceptive appearance of a cavity or darkened ledge that certain species of bird typically approach with speed when seeking roosting sites. The deception is achieved when shadows from awnings or the interior light conditions

give the appearance of cavities or protected ledges. This factor appears potentially to be nuanced variations on transparency or reflectance or possibly an interaction effect of both of these factors.

(5) Window or façade extent.—Klem et al. (2009), Borden et al. (2010), Hager et al. (2013), and Ocampo-Peñuela et al. (2016) reported increased collision fatalities at buildings with larger reflective facades or higher proportions of facades composed of windows. However, Porter and Huang (2015) found a negative relationship between fatalities found and proportion of façade that was glazed.

O-CSN-1.67 (cont'd.)

(6) Size of window.—According to Kahle et al. (2016), collision rates were higher on large-pane windows compared to small-pane windows.

(7) Type of glass.—Klem et al. (2009) found that collision fatalities associated with the type of glass used on buildings. Otherwise, little attention has been directed towards the types of glass in buildings.

(8) Lighting.—Parkins et al. (2015) found that light emission from buildings correlated positively with percent glass on the façade, suggesting that lighting is linked to the extent of windows. Zink and Eckles (2010) reported fatality reductions, including an 80% reduction at a Chicago high-rise, upon the initiation of the Lights-out Program. However, Zink and Eckles (2010) provided no information on their search effort, such as the number of searches or search interval or search area around each building.

(9) Height of structure.—I found little if any hypothesis-testing related to high-rise buildings, including whether another suite of factors might relate to collision victims of high-rises. Are migrants more commonly the victims of high-rises? I would expect that some of the factors noted in other contexts will not be important with the upper portions of high-rises, such as birds attacking reflected self-images, or the extent of vegetation cover nearby, or the presence or absence of birdfeeders nearby.

(10) Orientation of façade.—Some studies tested façade orientation, but not convincingly. Confounding factors such as the extent and types of windows would require large sample sizes of collision victims to parse out the variation so that some portion of it could be attributed to orientation of façade.

(11) Structural layout.—Bird-safe building guidelines have illustrated examples of structural layouts associated with high rates of bird-window collisions, but little attention has been towards hazardous structural layouts in the scientific literature. An exception was Johnson and Hudson (1976), who found high collision rates at 3 stories of glassed-in walkways atop an open breezeway, located on a break in slope with trees on one side and open sky on the other, Washington State University.

(12) Context in urban-rural gradient.—Numbers of fatalities found in monitoring have associated negatively with increasing developed area surrounding the building (Hager et al. 2013), and positively with more rural settings (Kummer et al. 2016a). However, these relationships might not hold when it comes to high-rises.

(13) Height, structure and extent of vegetation near building.—Correlations have sometimes been found between collision rates and the presence or extent of vegetation near windows (Hager et al. 2008, Borden et al. 2010, Kummer et al. 2016a, Ocampo-Peñuela et al. 2016). However, Porter and Huang (2015) found a negative relationship between fatalities found and vegetation cover near the building.

(14) Presence of birdfeeders.—Dunn (1993) reported a weak correlation ($r = 0.13$, $P < 0.001$) between number of birds killed by home windows and the number of birds counted at feeders. However, Kummer and Bayne (2015) found that experimental installment of birdfeeders at homes increased bird collisions with windows 1.84-fold.

(15) Relative abundance.—Collision rates have often been assumed to increase with local density or relative abundance (Klem 1989), and positive correlations have been measured (Dunn 1993, Hager et al. 2008). However, Hager and Craig (2014) found a negative correlation between fatality rates and relative abundance near buildings.

O-CSN-1.67 (cont'd.)

(16) Season of the year.—Borden et al. (2010) found 90% of collision fatalities during spring and fall migration periods. The significance of this finding is magnified by 7-day carcass persistence rates of 0.45 and 0.35 in spring and fall, rates which were considerably lower than during winter and summer (Hager et al. 2012). In other words, the concentration of fatalities during migration seasons would increase after applying seasonally-explicit adjustments for carcass persistence.

(17) Ecology, demography and behavior.—Klem (1989) noted that certain types of birds were not found as common window-caused fatalities, including soaring hawks and waterbirds. Cusa et al. (2015) found that species colliding with buildings surrounded by higher levels of urban greenery were foliage gleaners, and species colliding with buildings surrounded by higher levels of urbanization were ground foragers. Sabo et al. (2016) found no difference in age class, but did find that migrants are more susceptible to collision than resident birds.

(18) Predatory attacks.—Panic flights caused by raptors were mentioned in 16% of window strike reports in Dunn's (1993) study. I have witnessed Cooper's hawks chasing birds into windows, including house finches next door to my home and a northern mocking bird chased directly into my office window.

(19) Aggressive social interactions.—I found no hypothesis-testing of the roles of aggressive social interactions in the literature other than the occasional anecdotal account of birds attacking their self-images reflected from windows. However, I have witnessed birds chasing each other and sometimes these chases resulting in one of the birds hitting a window.

SOLUTIONS

Given the magnitude of bird-window collision impacts, there are obviously great opportunities for reducing and minimizing these impacts going forward. Existing

structures can be modified or retrofitted to reduce impacts, and proposed new structures can be more carefully sited and designed to minimize impacts. However, the costs of some of these measures can be high and can vary greatly, but most importantly the efficacies of many of these measures remain uncertain. Both the costs and effectiveness of all of these measures can be better understood through experimentation and careful scientific investigation. Post-construction fatality monitoring should be an essential feature of any new building project. Below is a listing of mitigation options, along with some notes and findings from the literature.

O-CSN-1.67 (cont'd.)

(1) Retrofitting to reduce impacts

(1A) Marking windows
(1B) Managing outdoor landscape vegetation
(1C) Managing indoor landscape vegetation
(1D) Managing nocturnal lighting

(1A) Marking windows.—Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 67% after placing decals on windows. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015). In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film.

(2) Siting and Designing to minimize impacts

(2A) Deciding on location of structure
(2B) Deciding on façade and orientation
(2C) Selecting type and sizes of windows
(2D) Designing to minimize transparency through two parallel facades
(2E) Designing to minimize views of interior plants
(2F) Landscaping to increase distances between windows and trees and shrubs

GUIDELINES ON BUILDING DESIGN

If the project goes forward, it should at a minimum adhere to available guidelines on building design intended to minimize collision hazards to birds. The American Bird Conservancy (ABC) produced an excellent set of guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015). The City of San Francisco (San Francisco Planning Department 2011) also has a set of building design guidelines, based on the excellent guidelines produced by the New York City Audubon Society (Orff et al. 2007). The ABC document and both the New York and San Francisco documents provide excellent alerting of potential bird-collision hazards as well as many visual examples. The San Francisco Planning Department's (2011) building design guidelines are more comprehensive than those of New York City, but they could have gone further. For example, the San Francisco guidelines probably should have also covered scientific

monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced.

Although the San Francisco Planning Department deserves to be commended for its building design guidelines, some of its guidelines are in need of further review and consideration. Scientific research and understanding of the bird-window collision impacts remain low on the learning-curve, so we should expect rapid advances in understanding and solutions as scientific investigations are better funded and monitoring efforts expand and experimentation is implemented. At the time of the 2011 guidelines, only one building had been scientifically monitored for bird-window collisions (Kahle et al. 2016), so very few local scientific data on the impacts were available in San Francisco. As a result, too many of the guidelines are based on anecdotes and speculation. For example, the bird collision zone of 0-60 feet above ground (San Francisco Planning Department 2011:28) appears to have been based on speculation. No doubt low-rise buildings can kill many birds annually, but the evidence of this does not preclude high-rises from also killing many birds annually. When it comes to high-rises, it has often been difficult to determine how high a bird was flying when it collided with the building. Collision victims are found at the base of the building and could have fallen from 1 to 6 stories up, or perhaps from 7 to 40 stories up. It needs to be recognized that although the guidelines are commendable as a starting point, much remains to be learned about bird-window collisions, and flexibility for considering other measures or revised measures is warranted.

O-CSN-1.67 (cont'd.)

In another example of a standard that could perhaps use more foundation, the urban bird refuge standard (San Francisco Planning Department 2011:28) includes thresholds of 300 feet and 2 acres of open space. These thresholds appear to have been arbitrarily derived. What scientific evidence supports either of them? How would these standards bear on nocturnal migrants encountering large glass windows at 390 feet above ground? I am not arguing that these standards are incorrect, but rather that they might be arbitrary and therefore bear opportunities for improvement.

The DEIR should be revised to address some of the San Francisco Planning Department's (2011) building design guidelines for the project as a whole. There is no reason why the DEIR could not address macro-setting guidelines in the forms of checklist and text discussion. To be consistent with its own guidelines, the San Francisco Planning Department also might not want to follow through on its plan to amend the Planning Code to require greening of at least 50% of each site area and to construct at least 50% of roof area as living roofs (DEIR page II-34).

MITIGATION

The bird-collision impacts potentially caused by the project could be mitigated to less than significant levels by implementing three measures:

1. Adhere to the San Francisco Planning Department's (2011) building design guidelines and to any other avoidance and minimization measures that have been learned additional or since the 2011 guidelines document was produced;

2. Fund long-term scientific monitoring of the impact so that lessons learned can be applied to future projects or perhaps to effective retrofit solutions; and,

3. Offset impacts that could not be avoided, minimized or reduced by compensating for the impacts. Compensation can include habitat protections elsewhere or donations to wildlife rehabilitation facilities that will likely receive and care for injured birds.

CONCLUSION

The proposed project would impose 200- to 400-foot tall high-rises in the aerial habitat of many birds. Birds migrating through San Francisco at night, in route north or south along the coast, would encounter these high-rises. Many of these nocturnal migrants would be attracted to light emissions from the buildings or would encounter the buildings by chance, and many of these birds would perish due to collision with these buildings. Other birds would encounter the high-rises during daylight hours and would be deceived by the transparency or reflected images in the glass of windows. Many of these birds would perish. At lower stories – those near the ground – windows reflecting planted trees would deceive birds into flying toward the reflected images and to their deaths. The numbers of collision fatalities could be very large, and some of the collision victims could be members of species that are rare or declining, and some could be special-status species, such as Sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperi*), Olive-sided flycatcher (*Contopus cooperi*), Least Bell's vireo (*Vireo belli pusillus*), yellow warbler (*Setophaga petechia*), and Lawrence's goldfinch (*Spinus lawrencei*). However, it should be remembered that nearly all birds in California are protected by the international Migratory Bird Treaty Act. The EIR should be revised to address these potential impacts. Available bird-safe building guidelines should be followed where appropriate, but additional measures will be needed where the guidelines are either wrong or based on poor foundation.

O-CSN-1.67
(cont'd.)

The EIR should be revised to include a biological resources assessment, which should report reasonable predictions of collision mortality. The EIR should also provide more detail about which building design guidelines will be implemented under which conditions. For example, macro-setting guidelines could be addressed in the EIR. The EIR should also provide details about fatality monitoring needed to quantify collision mortality. Finally, it should provide details about compensatory mitigation to offset the collision fatalities that cannot be prevented in building design.

Thank you for your consideration,



_____
Shawn Smallwood, Ph.D.

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O-CSPO

REUBEN, JUNIUS & ROSE, LLP

February 13, 2017

Via E-mail and Messenger

Lisa M. Gibson
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Lisa.Gibson@sfgov.org

Re: Central SoMa Plan DEIR – Public Comment

Dear Ms. Gibson:

Our office represents a number of property owners within the proposed Central SoMa Plan area. This letter contains general comments on the Draft Environmental Impact Report ("**DEIR**") for the Central SoMa Plan, published on December 14, 2016.

The comments are arranged by DEIR section and page number.

Summary

Page:	Comment:
S-9	Mitigation Measure M-CP-1c. This measure would require oral histories for sites where historic resources are demolished. The mitigation measure does not identify a deadline for completing an oral history. Since the mitigation measure does not require the building to be extant, this mitigation measure should clarify that oral histories are not prerequisites to the issuance of building or demolition permits.
S-10	Mitigation Measure M-CP-1e. This measure would require video documentation prior to the demolition of a historic resource, where planning staff determine such a measure would be effective and feasible. The measure states that the documentation "shall include as much information as possible...about the materials, construction

O-CSPO.1
CP-3

O-CSPO.2
CP-3

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	methods, current condition, historic use, and historic context of the historical resource" and must be completed prior to the issuance of a demolition or site permit for the project. This measure is novel and has not been included in other area plan EIRs. The requirement to provide "as much information as possible" does not provide a meaningful standard for sponsors regarding the content, format, or duration of video documentation, nor does it provide guidance to Planning Department staff for approving the videos. Together with the requirement to complete this mitigation prior to issuance of a site permit, the lack of clear standards regarding the content and approval standards of video documentation could substantially delay projects. This mitigation measure should be eliminated from the EIR.
S-12	Mitigation Measure M-CP-3a. This measure would require projects utilizing heavy equipment during construction to undertake a monitoring program of nearby historic resources, including requirements to conduct pre-construction surveys and ongoing vibration monitoring of the resources during construction. Certain monitoring measures may require authorization from the owners of the potentially-affected historic properties for developers to access and monitor their properties. The measure should therefore be made contingent on their provision of such access by clarifying that the mitigation measure may be satisfied by (a) exterior surveys from public vantages or private property accessible to the developer satisfy this mitigation measure, and (b) alternative methods of vibration monitoring in areas under the control of the developer. The Department should consider the limiting monitoring requirements to directly adjacent historic resources.
S-17	Mitigation Measure M-TR-3a. There is a formatting error in this table. The M-TR-3(b)-(c) elements have been indented as bullet points.
S-25	Mitigation Measure M-TR-9. This measure would require project sponsors to develop and, upon review and approval of the SFMTA and Public Works, implement a Construction Management Plan. If construction is proposed to overlap with nearby projects as to result in transportation-related impacts, the sponsor is also required to consult with various City departments to develop a Coordinated Construction Management Plan. These documents would include Restricted Construction Truck Access Hours, limiting truck movements to between 9 a.m. and

O-CSPO.2 (cont'd.)

O-CSPO.3
CP-3

O-CSPO.4
TR-13

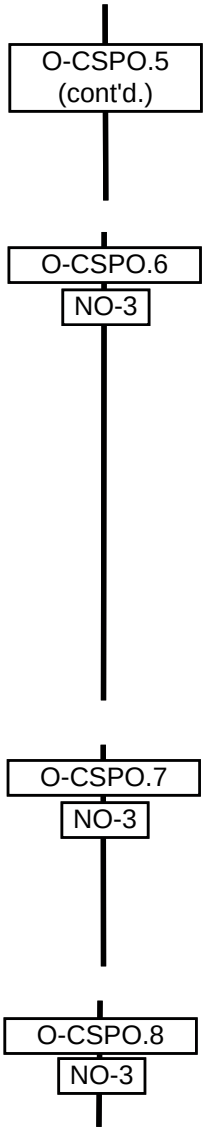
O-CSPO.5
TR-13

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	4 p.m., or other times if approved by SFMTA. The baseline hours provided may fall within times of heavy traffic or congestion at many sites within the Plan area, and would preclude evening or nighttime construction activities. This measure should be revised to provide site-specific flexibility and exceptions for exigent circumstances, or require limitation of construction truck access during peak commute hours, rather than identifying a pre-determined daytime window.
S-29	Mitigation Measure M-No-1a. Legislation establishing a TDM Program was adopted by the City in February, 2017. The text of this mitigation measure states that project sponsors shall develop and implement a TDM Plan as part of approval, the scope of which shall be in accordance with the Planning Department's TDM Standards for the type of development proposed. However, the measure also states that each project's TDM Plan shall "aim to achieve the maximum VMT rate reduction feasible." These above statements may conflict, as the TDM Standards do not require project sponsors to achieve a "maximum VMT rate reduction feasible," but instead to implement TDM measures as necessary to achieve the project's applicable TDM point targets. The later sentence should be eliminated, to clarify that this mitigation measure does not require project sponsors to take on greater TDM Plan obligations than would otherwise be required by the program implemented by the Planning Department.
S-30	Mitigation Measure M-No-1b. This mitigation measure requires project sponsors to implement noise analysis for new development including PDR, Places of Entertainment, or "other uses that would potentially generate noise levels substantially in excess of ambient noise…" The Department should clarify the range of development types to which this measure would likely apply, or indicate how it will determine whether a potential development qualifies for this "other uses" category.
S-31	Mitigation Measure M-No-2(a). This mitigation measure imposes a range of construction noise control measures. Plan area projects should not be required to exceed requirements of the current San Francisco Noise Ordinance for construction-related activities.



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Chapter II – Project Description

Page:	Comment:
II-22	Please ensure that the current draft Plan Implementation Measure 8.5.1.2 is addressed in the discussion of maximum building heights under this section. That measure provides that "An additional 25 feet of height may be permitted on sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow." In addition, the first full paragraph in this section states that "the project would allow for…five 160-foot buildings and about a half dozen buildings of 130 feet in height in the area south of Harrison Street…" However, the Plan identifies at least nine areas south of Harrison Street that would be zoned 130-CS. These areas incorporate multiple parcels, and therefore development in this height range may not be limited to 6 buildings.
II-23	Objective 8.3 and Objective 8.4. These objectives address potential height limits and massing restrictions for development within the Plan area. To provide a more accurate scope for analysis, each should reference (1) the potential for modification of massing requirements on key development sites; and (2) the potential for an additional 25 feet in height on certain sites within the Plan area, as discussed in Objective 8.5.

O-CSPO.9
PD-2

O-CSPO.10
PD-2

Chapter IV – Environmental Setting, Impacts, and Mitigation Measures

Page:	Comment:
IV-9	Subsequent Development Projects. The project address labeled "31 Bryant" should be corrected to "531 Bryant".

O-CSPO.11
OV-1

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	The project description for this development should be revised to reflect that it would demolish the two existing buildings at the site, but has proposed two possible options: either (1) complete removal of these structures or (2) potential retention of the existing building façade along Bryant Street.

O-CSPO.11 (cont'd.)

Chapter IV – Environmental Setting, Impacts, and Mitigation Measures
Section A – Land Use and Planning

Page:	Comment:
IV.A-1	Plan Area Boundaries and Location. The DEIR describes the Plan area boundary as having its northernmost point at Stevenson and Mission Streets. This description should be revised to incorporate the properties within the Plan area extending to Stevenson and 6th Streets.
IV.A-12	Other Regulations, Bullet #2. This bullet should be updated to reflect adoption of the TDM Program in 2017.

O-CSPO.12
LU-1
O-CSPO.13
LU-2

Chapter IV – Environmental Setting, Impacts, and Mitigation Measures
Section B – Aesthetics

Page:	Comment:
IV.B-33	Development Under the Plan. The discussion of maximum development heights in this section should address draft Plan Implementation Measure 8.5.1.2.
IV.B-37	Impact AE-2 Discussion. The third paragraph in this section states that the Plan would allow for approximately eight towers of between 200 and 400 feet in height on certain sites south of Bryant. The range of potential sites allowing for development of 130 feet in height or greater should also be considered in this section.

O-CSPO.14
AE-1
O-CSPO.15
AE-1

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Chapter IV – Environmental Setting, Impacts, and Mitigation Measures
Section G – Wind

Page:	Comment:	
IV.G-2	San Francisco's Existing Climate and Wind Environment. The first paragraph of this Section states that historic data collected at the San Francisco Federal Building at 50 United Nations Plaza over a six-year period shows that average wind speeds in the city are highest in the summer and lowest in the winter. Later in this paragraph, there is a reference to "over 40 years of record keeping" used to document the seasonal times of highest and lowest area wind speeds. It appears likely that this record keeping exceeds that collected at the 50 United Nations Plaza and may refer to other wind stations in the area. Please clarify.	O-CSPO.16 WI-2
IV.G-3	The first sentences on this page read "Southwest winds are similarly impeded at street level; they also continue to flow overhead, but they do not flow toward the South of Market (SoMa) area. Both northwest winds and southwest winds also contribute winds along the east/west oriented streets." This language appears to be referencing the fact that street level southwest winds do not flow toward SoMA due to the misalignment of the street grids. However, the last sentence seems to contradict the previous sentence. Please clarify.	O-CSPO.17 WI-2
IV.G-5	Methodology. The second paragraph of this section states "—the approximately four-block area between Bryant and Townsend Streets from the west side of Fifth Street to the east side of Fourth Street …" Assuming that the wind tunnel test area shown in the figure on the next page (Figure IV.G-1) is correct, this should be revised to read "from the east side of Sixth Street to the east side of Fourth Street."	O-CSPO.18 WI-3
IV.G-7	The first full paragraph on this page states that "the Plan would also allow for eight towers of between 200 feet and 400 feet in height on certain sites south of Bryant street…and for five 160-foot buildings and about half a dozen buildings of 130 feet in height in much of the area south of Harrison Street…" This discussion should incorporate the potential for height limits on some sites within the Plan area to be extended by up to 25 feet, as discussed in Plan Implementation Measure 8.5.1.2 of the current Draft Central SoMa Plan.	O-CSPO.19 WI-6

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IV.G-12	Existing Hazard Conditions. The first paragraph in this section states that three (3) test locations exceed the wind hazard criterion under current conditions. However, test location 29 appears to be at or below the hazard criterion, as shown in Figure IV.G-2. Please clarify.
IV.G-15	With-Plan Hazard Conditions. The first paragraph in this section states that a new hazard exceedance would occur at location #59, but this is not shown in Figure IV.G-3. Please clarify.
IV.G-16	Conclusion. This section states that the Plan could result in four (4) new exceedances of the 26-mph hazard criterion, but Figure IV.G-3 shows only three exceedances. Please clarify.

O-CSPO.20
WI-5

O-CSPO.21
WI-5

O-CSPO.22
WI-5

Thank you.

Very truly yours,

REUBEN, JUNIUS & ROSE, LLP

Melinda A. Sarjapur

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O-FADF

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February 13, 2017

Lisa M. Gibson
Acting Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103
and via e-mail Lisa.Gibson@sfgov.org

Re: Planning Department Case 2011.1356E
State Clearinghouse No. 2013042070

Dear Ms. Gibson:

We appreciate the Planning Department's support of SOMA Pilipinas – SF's Filipino Cultural Heritage District. As you know, the Central SOMA plan includes half of SOMA Pilipinas, and some of the most important cultural assets in our cultural district including the Gran Oriente Filipino Masonic Lodge in South Park which is a historic site, the Filipino Education Center, the Lapu Lapu Mural, Bonifacio, Mabini, Tandang Sora, and Rizal Streets, the Mendelson House and San Lorenzo Ruiz Center and many other buildings and alleyways that is home to the Filipino community. We also appreciate the SF Planning Department's commitment to working on the landmark designation of Filipino historic sites in San Francisco as part of SF's Historic Preservation program. O-FADF.1 OC-1

However, we are concerned that the Central SOMA rezoning will have significant impacts not only on our neighborhood and streets in the zoning area, but also in the immediate area which comprise the rest of our cultural district in regards to traffic, pedestrian safety, increased real estate value, and corresponding pressure and negative impacts on the affordability of housing and rental space for community serving non-profits and small businesses.

Many of the long time Filipino community members who currently reside in the Central SOMA are seniors on fixed income and working families who are vulnerable to rising rents and eviction. Like our Manongs and Manangs in the I-Hotel, they have felt the pressures from the tech boom and fear that with the rezoning and building of so many more office space, it will mean their eventual displacement.

One of the main goals of SOMA Pilipinas is the preservation and stabilization of the long-standing Filipino community and we ask you to look at the impact of this rezoning on the vulnerable populations of Central SOMA, not just the Filipinos but also all of our long-time friends and neighbors in the SROs and apartment buildings.

Lastly, we would also request that you look into how our cultural district can be incorporated and reflected in the new developments, as a result of the rezoning. All of Central SOMA is actually in the Filipino Cultural Heritage District and we would like to work with your commission to help ensure that design guidelines are developed to integrate the cultural district in future developments in the area. O-FADF.2 CP-5

Sincerely,

Bernadette Sy
Executive Director
Soma Pilipinas Project Sponsor

O-Freeman

FREEMAN

RECEIVED
JUL 03 2017
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
ENVIRONMENTAL PLANNING

June 27, 2017

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

RE: Central SoMa Plan Draft Environmental Impact Report

To Whom It May Concern:

On behalf of Freeman Expositions Inc., which stages 80 percent of Moscone Center's events, the San Francisco Chamber of Commerce, San Francisco Travel, Hotel Council of San Francisco as well as a coalition of organized labor organizations who work at Moscone, we wish to share our comments on the Central SoMa Plan Draft Environmental Impact Report (EIR) issued in December 2016.

O-Freeman.1

TR-10

Moscone Center is the principal venue for San Francisco's multi-billion dollar convention industry. During the 2015-16 fiscal year, thousands of locally employed and well-compensated tradespeople constructed, staged and dismantled 114 different events. We are concerned about potential changes to road traffic controls near Moscone Center and how they will impact these workers and convention operations.

Our 24-hour/7-day a week convention operations depend on Moscone's trucking access as it exists -- specifically keeping Howard and Folsom Streets between 3rd and 4th streets one way. This traffic configuration was thoroughly vetted in stakeholder meetings with neighborhood and business leaders many years ago to accommodate the large trucks and shuttle buses that service the Moscone schedule of events. This solution has worked well given our dense urban environment.

As part of the expansion, the new Moscone Center South Loading Dock entrance on 3rd Street has shifted south some 75 feet closer to the Folsom Street corner. Large trucks making the turn from Folsom Street onto 3rd Street and into the loading dock entrance will require a wider swing area, often from the second or middle lane of Folsom Street.

It is critical that the Folsom Street north curb lane between 3rd and 4th Streets remains unchanged and available for this purpose.

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O-Freeman.1 (cont'd.)

We urge you to consider our comments before making any decision. We will be happy to provide more information on these issues if you have additional questions.

Thank you in advance for keeping us apprised of new developments or changes to the Central SoMa Plan Draft Environmental Impact Report (EIR).

Sincerely,

Bill Kuehnle
Vice President and General Manager
Freeman Expositions Inc.

Jim Lazarus
Senior Vice President, Public Policy
San Francisco Chamber of Commerce

Joe D'Alessandro
President & CEO
San Francisco Travel

Kevin Carroll
Executive Director
Hotel Council of San Francisco

John Doherty
Business Manager
International Brotherhood of Electrical Workers, Local 6

Steve Lutge
Business Agent
International Alliance of Theatrical Stage Employees, Local 16

Joe Toback
Business Representatives
International Union of Painters and Allied Trades, Local 510 Sign & Display

Joseph Cilia
Secretary-Treasurer
International Brotherhood of Teamsters, Local 2785

O-MPHA

February 10, 2017

San Francisco Planning Department
Lisa M. Gibson, Acting Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103
Email: lisa.gibson@sfgov.org

Re: Central SoMa Plan DEIR

Dear Ms. Gibson,

I, as Board President of the Museum Parc HOA (233-unit residential condominium building), am concerned about the proposed street network changes discussed in Chapter 4D of the current Central SoMa Plan Draft Environmental Impact Report. Our building is at 300 Third Street at the corner of Third and Folsom streets and contains 233 residential units, ground-floor commercial space and three levels of parking for residents and the public. We are concerned that the proposed changes to the street network adjacent to our building will have a serious adverse effect on our residents, visitors and businesses.

O-MPHA.1

TR-4

First, the DEIR recognizes that the significant reduction of traffic capacity on Folsom Street will result in increased congestion at both am and pm peak hours. This could significantly affect ingress and egress from our garage. Our garage has an entrance and exit onto Folsom Street and an entrance on Third Street which are already congested from traffic approaching the Bay Bridge during most pm peak hours. This makes entering or exiting the garage difficult and time-consuming which further adds to the congestion and as well as vehicle emissions. It appears from the DEIR that the proposed street network changes will make this much worse, and create am peak hour congestion as well, but there is no discussion of negative effects on local vehicle circulation as it affects existing residents and businesses. The two-way Folsom Street option is particularly concerning as traffic in the westbound direction could come to a complete stop as vehicles attempt a left-hand turn from Folsom Street into the garage entrance. Furthermore, pedestrian safety could be compromised.

O-MPHA.2

TR-8

Second, our building relies daily on a myriad of service and delivery vehicles. We have only limited on-site loading space in the garage. The vast majority of service providers utilize the curbside parking spaces along both Third and Folsom streets adjacent to the building. The proposed elimination of parking on Third Street and the partial elimination of parking along Folsom Street, except for the the south side at non-peak hours, will greatly restrict access to our building for these service providers that our building relies on to function properly on a daily basis. And it's certainly possible that we will rely on curbside loading even more in the future as residents make more and more internet purchases that require physical delivery. Emergency vehicles that are called to the building also utilize curbside parking space that would be eliminated by the proposed street network changes. Again, while these potential impacts are identified in the DEIR there is no analysis of the effects on existing residential and commercial buildings.

The DEIR identifies potential neighborhood-level impacts of the street network changes that could adversely affect our ability to access and operate the building in a safe and efficient manner but does not evaluate those effects not only on Museum Parc but on other similarly situated existing residential buildings. The Final EIR should be further refined to evaluate the adverse impacts of the street network changes on existing neighborhood residents and businesses.

Sincerely,

Jim Bourgart

Digitally signed by Jim Bourgart
DN: cn=Jim Bourgart, o=Museum Parc HOA, ou, email=fserrano@citiscapesf.com, c=US
Date: 2017.02.13 11:19:25 -08'00'

Jim Bourgart
Museum Parc Homeowners Association
300 Third Street
San Francisco, CA 94107

O-One Vassar

REUBEN, JUNIUS & ROSE, LLP

February 13, 2017

Via E-mail and Messenger

Lisa M. Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
Lisa.Gibson@sfgov.org

Re: Central SoMa Plan DEIR Comments – One Vassar Project
Our File No.: 10009.01

Dear Ms. Gibson:

Our office represents One Vassar, LLC ("**Project Sponsor**"), the developer of a proposed mixed-use office, hotel, and residential project comprised of multiple parcels located on the south side of Harrison Street between Second and Third Streets (the "**One Vassar Project**") in the proposed Central SoMa Plan area.

This letter contains comments on the Draft Environmental Impact Report ("**DEIR**") for the Central SoMa Plan, published on December 14, 2016. The comments are arranged below by DEIR section and page number.

Chapter III - Plans and Policies

Page:	Comment:
III-10	Urban Design Element: Text provides that "In addition, several parcels north of the I-80 freeway and east of Fourth Street would be zoned to a maximum of 300-feet." This should be changed to 350 feet, to be consistent with the proposed height increase map in Figure II-7.

O-One Vassar.1
PD-9

James A. Reuben | Andrew J. Junius | Kevin H. Rose | Daniel A. Frattin | John Kevlin
Tuija I. Catalano | Jay F. Drake | Lindsay M. Petrone | Sheryl Reuben[1] | Thomas Tunny
David Silverman | Melinda A. Sarjapur | Mark H. Loper | Jody Knight | Chloe V. Angelis
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1. Also admitted in New York 2. Of Counsel 3. Also admitted in Massachusetts

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III-20	The discussion of anticipated Section 321 office allocations on this page should include the One Vassar projects' anticipated 421,000 gsf allocation, as reflected in the application filed with the Planning Department in April 2016.

O-One Vassar.2
PP-7

Chapter IV – Environmental Setting, Impacts, and Mitigation Measures

Page:	Comment:
IV-9	The 400 Second Street project description should be amended to better reflect the full scope of the One Vassar project, as provided in the current environmental application. The project would merge multiple parcels on the south side of Harrison Street, retain one of the existing buildings (645 Harrison), demolish the remaining four structures, and construct two new buildings and an addition above the existing 645 Harrison structure. The project anticipates construction of two towers reaching heights of approximately 350, and an additional building reaching a height of approximately 200 feet. The project will result in the creation of a mid-block passage way connection Harrison and Perry Streets, improvement of the existing Vassar Place, and a new connection from Second Street to Vassar Place and Perry Street. The project would create approximately 380 dwelling units, 500 hotel rooms, and 535,000 gross square feet of office use.
IV.B-38	This section states that the tallest new vertical elements (at parcels on Fourth Street at Townsend Street, Fourth Street at Brannan Street, and Harrison Street at Third Street) would partially obscure views of the Bay. Please ensure that the anticipated development of the Key Development Site #3 structures are incorporated within this discussion.
IV.C-28	Table IV.C-4. This section identifies 645 Harrison Street as a potential Article 10 Landmark. While the Project Sponsor acknowledges that the building is a historic resource under the California Environmental Quality Act, we do not believe the record includes sufficient facts or analysis to conclude that the building's architecture or cultural importance rises to the level of being considered a landmark building under Planning Code Article 10.

O-One Vassar.3
OV-1

O-One Vassar.4
AE-3

O-One Vassar.5
CP-4

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IV.C-55	The first full paragraph on this page lists properties containing historic resources that may be affected by anticipated Plan area development. This list should include the existing structures at 400 Second Street and 665 Harrison.
IV.D – General	The draft Central SoMa Plan has identified the potential for a transit-only lane on Harrison. In order to accommodate this transit-only lane, one traffic lane from each direction is proposed to be removed. However, the DEIR does not seem to address the additional lane width lost from the anticipated sidewalk widening proposed by the Plan. The DEIR should address the interaction of these two proposals and potential impacts on vehicular circulation along Harrison.
IV.D-68	Loading Impacts. Given the scope of development proposed for the One Vassar Project, the DEIR should acknowledge a need for flexibility in loading access along the south side of Harrison Street and Perry Street. The One Vassar Project may include a lay-by located on Harrison Street, just west of the Hawthorn crosswalks to serve as a drop-off for the residential building.
IV.H-38-39	Shadow on Plan-Proposed Open Spaces. The One Vassar Project is anticipated to include a 45'-wide pedestrian alley between its residential and hotel buildings which may constitute privately-accessible public open space. This section should reflect the potential development of this pedestrian alley and note that permitted development on adjacent parcels would necessarily result in significant shadow to this area.

O-One Vassar.6
CP-1

O-One Vassar.7
TR-14

O-One Vassar.8
GC-6

O-One Vassar.9
GC-6

General Comments

Page:	Comment:
N/A	The DEIR should reflect any anticipated transportation, circulation, air quality, shadow, or construction-related impacts of the TJPA's current proposal to locate a bus storage facility on Lot 112 of Block 3763, adjacent to the One Vassar Project site.

O-One Vassar.10
CU-4

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Thank you.

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O-SDA

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February 13, 2017

Lisa M. Gibson
Acting Environmental Review Officer
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Suite 400
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Lisa.gibson@sfgov.org

Re: Department (Planning) case 2011.1356E
State Clearninghouse No. 2013042070

Ms. Gibson:

Senior and Disability Action is an organization that mobilizes and educates seniors and people with disabilities to fight for individual rights and social justice. Through individual support and collective action, we work together to create a city and world in which seniors and people with disabilities can live well and safely.

O-SDA.1

GC-11

Our organization is submitting this comment letter in regards to the Central SoMa Plan Draft Environmental Impact report (IE: DEIR) which covers the South of Market Area—2nd Street, 6th street (East and west respectively), Townsend, Folsom, Howard and Stevenson Streets.

We have concerns in regards to the scope of the plan and the impacts that it will have on seniors and those with disabilities in regards to traffic and open space. The EIR is "Plan area" specific, not project level. With a proposal of this magnitude, we feel that the communities voice must not be shut out, that thorough public review must be accommodated.

We are very concerned of the creating of a high rise district outside of the financial district. Many seniors and people with disabilities live in this aea. What will be the impact on pedestrian safety? Many of our seniors have had close calls and some have had accidents that required extended hospital stays. Wind is a big concern. One of our members suffered a fall in a gust of wind, injuring her knees. And what of the impacts on housing stability of seniors and those with disabilities? What are the inpacts of the influx of new community members?

These concerns are very real to our organization and reflect the concerns of seniors and people with disabilities whom we serve. We feel that the DEIR is insuffient and urge that a new alternative be explored and conceived, with sufficient public input and discourse.

OPEIU Local 3

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Sincerely,

Tony Robles

Tony Robles
Housign Organizing Director
Senior and Disability Action

O-SFBC

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PROMOTING THE BICYCLE FOR EVERYDAY TRANSPORTATION

February 14, 2017

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

RE: Comments on the Draft Environmental Impact Report for the Central SoMa Plan

To Lisa Gibson:

On behalf of the San Francisco Bicycle Coalition and our 10,000-plus members, I am writing to provide feedback on the Central SoMa Plan Draft Environmental Impact Report, released December 14, 2016.

With over 10,000 members supporting our mission of promoting the bicycle for everyday transportation, our vision for the South of Market neighborhood is simple: A network of walkable, bike-friendly and people-centered streets. In order to realize that vision, we will need to embrace all transportation projects that significantly reduce Vehicle Miles Traveled as outlined in Chapter IV, Section D of the DEIR.

By your department's analysis, development associated with the Plan would generate thousands of new trips in SoMa. As further acknowledged by the Plan, these new trips could increase the potential for vehicular-bicycle and pedestrian-bicycle conflicts by exposing additional people to existing transportation conflicts and hazards. The proposed addition of cycle tracks along Folsom, Howard, Third and Fourth Streets would expand the existing bicycle network in a meaningful way.

O-SFBC.1

TR-9

However, for the impacts of the Plan's street network changes on bicycle circulation to be truly less than significant, it is crucial that all of the proposed new facilities be implemented at a high level of quality. Given the history of serious and fatal crashes along the Folsom Street corridor, we know that anything less than cycle tracks designed in line with NACTO and FHWA standards along all of the proposed corridors is insufficient and will result in increasingly unsafe conditions for bicyclists.

For the reasons above, the SF Bicycle Coalition wholly supports the bicycle elements outlined in the Central SoMa Plan and believes that strong transportation improvements will lay the groundwork for a thriving SoMa.

O-SFBC.2

PM-2

Sincerely,

Janice Li
Advocacy Director
San Francisco Bicycle Coalition

O-SFRG-1

SAN FRANCISCANS FOR REASONABLE GROWTH

c/o 230 Fourth Street, San Francisco CA 94103

Lisa Gibson
Acting Environmental Review Officer
San Francisco Department of City Planning
1650 Mission Street
San Francisco, CA 94103 February 13, 2017

RE: Central SOMA Plan DEIR: 2011.1356E

This DEIR is legally inadequate per CEQA for the following reasons:

O-SFRG-1.1
PD-4

After adoption of the City's Downtown Plan rezoning in 1995, SFRG brought suit challenging the DTP's EIR legal adequacy. Following negotiations this case was settled several years later by agreement between SFRG and CCSF. I was a member of the SFRG board of directors at the time and a member of its negotiating team. The Settlement Agreement addressed three topics: future City EIR methodology for cumulative impact analyses (which was implemented), updating of the Seismic Safety Element of the City Master Plane (which was completed), and a commitment for the City to henceforth prepare "readable" EIR's whose analyses could be readily understood by members of the general public with technical backgrounds.

In recent years the Department's standard for EIR's readability has clearly decayed in general, becoming progressively more technocratic in nature. But as detailed in the attached CSP DEIR comments by Alice Light, which are hereby included as comment here, the Central SOMA Plan's DEIR's discussion of the setting and impacts of its project-level-analysis of the Folsom/Howard Streetscape Project – several very complex alternative re-configurations of the traffic patterns for these and adjacent streets that could have huge practical impacts on the everyday lives of all SOMA residents – has crossed the line into sheer incomprehensibility**. If not corrected, this will be a direction violation of the Settlement Agreement between the City and SFRG.**

To comply with the City/SFRG Agreement the CSP EIR discussion of the setting/impacts for the Folsom/Howard Streetscape Project must be completely rewritten as a discrete separate section of the EIR – a variant? – with all relevant information presented in maps and tables so as to be readily understandable by the general public without reference to other documents, such as the EIR Appendix.

John Elberling
Member

Cc: Susan Brandt-Hawley

O-SOMCAM-Cabande

South of Market Community Action Network
1110 Howard Street | SF, CA 94103 | phone (415) 255-7693 | www.somcan.org

February 13, 2017

Lisa M. Gibson
Acting Environmental Review Officer
1650 Mission Street
Suite 400
San Francisco, CA 94103
and via e-mail Lisa.Gibson@sfgov.org

Re: Planning Department Case 2011.1356E
State Clearinghouse No. 2013042070

Dear Ms. Gibson:

The South of Market Community Action Network ("SOMCAN") is a multi-racial, community organization that educates, organizes, and mobilizes immigrant and low-income South of Market ("SoMa") residents to fight for improvements to their quality of life by engaging in the decision making processes that affect their neighborhood and greater San Francisco. Our mission is to build and support a strong, organized community that takes collective action to achieve equity, and social and economic justice. SOMCAN works to address gentrification and displacement issues in SoMa and San Francisco.

We respectfully submit this comment letter on the Central SoMa Plan Draft Environmental Impact Report (the "DEIR"), which encompasses the area of South of Market bounded by 2nd Street (east); 6th Street (west); Townsend Street (south); and an irregular border jogging between Folsom, Howard and Stevenson Streets (north).

Comment Period Extension Period Should Have Been Granted

O-SOMCAM-Cabande.1
GC-3

Firstly, we object again on the grounds that there has been insufficient time for the public to review this nearly 700 page long technical document. We, along with other community members, submitted a letter dated February 3, 2017 requesting for an extension of the comment period, which Planning denied.

Since 2000, SOMCAN has worked to educate and organize the community particularly around land use issues. With only 60 days from the release of the DEIR to the closing of the comment period, and the fact that the DEIR was released on December 14, 2016 just prior to the holidays, there has not been enough time for our organization to complete a thorough review, technical and otherwise, of the DEIR, as well as present the contents to community members, and compile their feedback. This a fatal flaw and fundamental deficiency of this DEIR that it has not sufficiently been available to the public for review and comment.

O-SOMCAM-Cabande.1 (cont'd.)

A More Extensive and Thorough Public Review Needed of DEIR Given Relaxing of Project Level Reviews

O-SOMCAM-Cabande.2

GC-3

This is not a project level EIR. This is a Plan Area EIR that comes to us in the new era of "by-right" development encouraged at the State level (there is once again legislation pending at the State level to allow development "by-right" without any project level environmental review or public hearings) and at our local level, with this Central SoMa Plan proposing a radical relaxing of development controls.

In the past, Area Plans have been written with the presumption that more detailed environmental review will be done as projects are proposed by developers during the implementation of the Area Plans. This will almost certainly not be the case here, yet the public has not been allowed a reasonable time to review this DEIR and provide comment; and Planning has ignored the fact that the City is reducing the public's ability to comment on implementation of the Central SoMa Plan going forward.

The following are SOMCAN's comments to the DEIR as we have best been able to compile them given the insufficient time Planning has afforded our organization to engage residents of SoMa in a thorough review and understanding of the contents of this DEIR.

SOMCAN's areas of concern are:

1. **The Central SoMa Plan Creates a Second Financial District at the Expense of Families, Youth and Seniors Living, Working and Going to School in SoMa.**
2. **The Central SoMa Plan Disregards the *SoMa Youth and Family Special Use District***
3. **The Inadequate Transportation Infrastructure and Impact of Ride Hailing Companies Within and Adjacent to the Plan Area of the DEIR are Not Fully Considered**
4. **The Proposed Intensity of Development and Relaxing of Development Controls Have Not Been Evaluated With Respect to State Density Bonus Laws in the DEIR**
5. **The Economic Impacts From Displacement Were Not Analyzed in the DEIR**
6. **The DEIR Omits Analyses of the Current Trend of Residential Units Not Being Used as Traditional Housing**
7. **The 5M Project Must be Included in the DEIR Analysis**
8. **The Impacts of New Office Space and Lack of Local Hiring Requirements are Not Properly Presented or Studied in the DEIR**

9. **Consideration of Continued PDR Uses in Central SoMa is Inadequate**
10. **The DEIR Does Not Address the Lack of Affordability of Housing Incentivized By the Plan and the Socioeconomic Makeup of New Residents That Will Result**
11. **The Plan Continues to Provide an Inadequate Amount of Open Space in SoMa By Relying on POPOS**
12. **The Plan Does Not Address the Stabilization of SoMa based Non-Profit Organizations**
13. **The DEIR Does Not Adequately Study the Health Impacts from Increased Noise, Degraded Air Quality, Pedestrian Safety Hazards, and Increased Wind Speeds**

EXPLANATION OF CONCERNS:

1. **The Central SoMa Plan Creates a Second Financial District at the Expense of Families, Youth and Seniors Living, Working and Going to School in SoMa**

O-SOMCAM-Cabande.3

PM-1

The area defined as the Central SoMa Plan Area is a neighborhood. While we are not opposed to further growth, we are opposed to Planning's proposed transformation of this neighborhood into a new Financial District. The scale of development and the mix of commercial, office and high end luxury development described in the Plan are not conducive to a healthy neighborhood.

There are many established aspects to what constitutes a healthy neighborhood that the DEIR should be studied against. We demand that this DEIR be studied against the City's Healthy Development Measurement Tool (HDMT), which was developed by Planning in partnership with the Department of Public Health and community organizations during the Eastern Neighborhoods rezoning[1]. Please refer to the Eastern Neighborhoods Community Health Impact Assessment (ENCHIA)[2].[3]

Youth, families and seniors in SoMa demand a family-friendly neighborhood, human scale, safety for pedestrians of all ages and abilities, with access to light and air, and neighborhood services close by. The Plan as proposed is completely out of character with the goal of sustaining Central SoMa as a neighborhood and a dynamic employment center co-existing in a mutually supportive way. Instead of building towards the long-established community and City goal of creating a family-friendly neighborhood in Central SoMa, the DEIR proposes a second Financial District, which will harm the health of existing and future populations.

2. **The Central SoMa Plan Disregards the *SoMa Youth and Family Special Use District***

O-SOMCAM-Cabande.4

PM-5

[1] http://www.who.int/hia/conference/poster_bhatia_2.pdf
[2] http://www.pewtrusts.org/en/multimedia/data-visualizations/2015/hia-map/state/california/eastern-neighborhoods-community
[3] http://www.pewtrusts.org/~/media/assets/2007/09/hiareportenchia.pdf?la=en

The Central SoMa Plan incorporates areas that are covered under the *SoMa Youth and Family Special Use District*[4] was adopted by the Board of Supervisors in January 2009. The *SoMa Youth and Family Special Use District*'s purpose is to expand the stock of affordable housing, as well as protect and enhance the health and environment of youth and families in SoMa. The Central SoMa Plan does not adequately take into account the *SoMa Youth and Family Special Use District* and instead of strengthening its controls, the DEIR undermines its goals.

O-SOMCAM-Cabande.4 (cont'd.)

We demand that as part of the Central SoMa Plan, projects within the *SoMa Youth and Family Special Use District* are required to undergo review and approval by resident groups and community organizations before they are considered by the Planning Department. We are demanding that this community approval process function similarly to other Special Use Districts in the City such as the *Bernal Heights Special Use District*.[5]

Planning has abused the *SoMa Youth and Family Special Use District* since it was established during the Eastern Neighborhood rezoning. These abuses including the re-mapping of the *SoMa Youth and Family Special Use District* by the Hearst and Forest City's 5M development, which covers five city blocks near 5th and Mission Streets. The 5M project gained approval in December 2015 for a large office tower by re-mapping the boundaries of the *SoMa Youth and Family Special Use District* with justifications by the Planning Department that this Special Use District does not have strong controls. SOMCAN, along with several other community-based organizations, have been demanding strong controls since *before* 2009 for the *SoMa Youth and Family Special Use District* so we can protect youth, families and seniors in the neighborhood. Planning has ignored our calls to strengthen this *SoMa Youth and Family Special Use District* through the Central SoMa rezoning process. The Central SoMa Plan must be revised to address this deficiency.

The environmental impact of displacement is clear and further criticized in our point #5 below. As long as Planning continues to promote the displacement of youth, families and seniors from Central SoMa in favor of large scale office and luxury housing developments, there will be an increasing and compounding environmental impact which has not been studied or reported in the DEIR. We demand that Planning revises the Central SoMa Plan in partnership with the community to strengthen the controls of the *SoMa Youth and Family Special Use District* in order to stabilize and grow our economically and racially diverse community.

3. The Inadequate Transportation Infrastructure and Impact of Ride Hailing Companies Within and Adjacent to the Plan Area of the DEIR are Not Fully Considered

O-SOMCAM-Cabande.5

TR-8

The transportation infrastructure within and adjacent to the plan area of the Central SoMa DEIR lags far behind the infrastructure needs of both past and current growth. This is true, even if you factor in the transportation improvements that are underway, such as the Central Subway.

[4] http://sf-planning.org/sites/default/files/FileCenter/Documents/1479-SoMa_YFZ_SUD_Legislation.pdf
[5] http://masonkirby.com/wpb/wp-content/uploads/2010/03/nwbhdrb_infopacket.pdf

The Central SoMa Plan is predicated on the construction of the Central Subway that connects Central SoMa with Chinatown. The Central Subway addresses a transit need that is long overdue as public transit for SoMa has been inadequate for decades. Because of years of lack of infrastructure improvements, the Central Subway is addressing a past need, not a present or future need. As State Senator Scott Wiener has said, "San Francisco's unfunded transportation needs are billions and billions of dollars" because "MTA has a long history of not moving quickly enough on important capital projects'"[6] Thus, even with the new Central Subway, the transportation infrastructure will continue to be inadequate.

O-SOMCAM-Cabande.5 (cont'd.)

There is also mention of the construction of the new Transbay Terminal just to the east of the Central SoMa Plan Area. However, Transbay Terminal won't be completed for some time, and it is unclear whether it will connect with CalTrain. Also, proximity to BART should not factor into the Central SoMa Plan because it runs down Market Street which is two to three long blocks north of the Central SoMa Plan Area. BART is not only far from the Plan Area, it has its own issues with capital obsolescence, and is hardly in condition to accommodate dramatic growth.

The DEIR is also negligent in assessing the new impacts of ride-hailing/ Transportation Network Company (TNC) services like Uber and Lyft. The references in the DEIR on pages IV.D-65 and IV.D-76 are completely inadequate. Their impact can in no way be equated with bicycles in terms of traffic or environmental impact. Their vehicles circle endlessly as they aim to be proximate to the next person who orders their services such as rides and food deliveries. As more office space and more residences are built in the Plan Area, the volume and impacts from these services will increase dramatically. The DEIR completely ignores this environmental impact.

O-SOMCAM-Cabande.6

TR-5

The increase in ride-hailing/ TNC traffic not only increases "Vehicle Miles Traveled" (the new CEQA standard in assessing traffic impacts) it will also impact the "Level of Service" (the CEQA previous standard) at many intersections. It will also impact pedestrian safety in ways that have not been studied. All of these omissions-- inadequately evaluating the transportation infrastructure needs of the current and increased future population and the lack of proper analysis of ride-sharing traffic-- make the DEIR dangerously deficient.

4. The Proposed Intensity of Development and Relaxing of Development Controls Have Not Been Evaluated With Respect to State Density Bonus Laws in the DEIR

O-SOMCAM-Cabande.7

PD-10

In 2016, the City passed the "Density Done Right" legislation allowing 100% affordable housing developments to apply for a significant increase in height and number of units without any rezoning. Also during 2016, legislation passed at the State level to enable developers throughout California to more easily take advantage of State Density Bonus incentives.

The DEIR references these laws on p. II-22 but only in reference to increased heights. It's unclear how the State Density Bonus will or will not be applied to heights and to unit counts for

[6] http://www.sfexaminer.com/wiener-proposes-major-fundraising-legislation-for-transportation-agencies-statewide/

market rate developments, especially in light of Planning's approval of the project at 333 12th Street, the first housing development in San Francisco to be approved with applying the State Density Bonus. The DEIR also references the Density Bonus for affordable housing projects on p. VI-2 but says that the increased number of units has not been considered for the DEIR. The DEIR is incomplete if it does not completely study the impacts of increased heights and increased number of units for both affordable and market rate housing.

O-SOMCAM-Cabande.7 (cont'd.)

The DEIR must also completely disclose to the public where developers are eligible to use either the State Density Bonus Program, or the San Francisco "Density Done Right" program. The DEIR must clearly indicate on maps where those sites are located, and must compare the new proposed zoning and its resulting intensity of use with the potential intensity of use if developers take either the State or Local density bonus. The DEIR must compare the relative impacts of these two scenarios on the environment. Without these analyses for each project within the plan area, as well as the overall impacts, the DEIR is inadequate.

5. The Economic Impacts From Displacement Were Not Analyzed in the DEIR

O-SOMCAM-Cabande.8

OC-1

Regardless of the assertions in the DEIR, there are environmental impacts due to displacement of residents from their homes or small businesses in SoMa, especially when considering the huge increase in "Vehicle Miles Traveled" that will result with this proposed Central SoMa Plan.

There are several ways that the Central SoMa Plan encourages displacement in an area already suffering from increased no-fault evictions and skyrocketing rents. A UC Berkeley study in collaboration with UCLA shows that SoMa is undergoing "advanced gentrification."[7] Gentrification happens when more affluent people replace less wealthy people. The DEIR encourages luxury, high end housing in SoMa, which in turn encourages the price of other housing to increase. Landlords of adjacent properties begin to charge more rent to cash in on the new populations in the nearby luxury condos or new high-end shops.

The DEIR upzones large swaths of Central SoMa. Upzoning of property increases the values of the underlying land, which leads to increased costs for residential and commercial tenancies and increased sale prices. Therefore existing residents or small businesses that are paying less than the new market rate will be forced out. Upzoning incentivizes tearing down existing housing and existing small businesses so that developers can maximize the new build-out potential of that property. Coupled with the relaxing of local controls and push to have less local approval hearings, there will be less incentive for developers to provide "right to return" or provide increased levels of affordability to existing residents or businesses that will be forced out when the buildings are torn down.

There are no new protections being implemented by the DEIR for existing tenants and community serving institutions and businesses. Other than the push to preserve certain historic areas and buildings, there are no new protections in place to prevent displacement that the City

[7] http://www.urbandisplacement.org/map/sf

knows will occur due to the new development that will be incentivized by this Central SoMa Plan (as exhibited in Plan Bay Area "Communities of Concern"). As shown in a University of California Berkeley report on transit oriented development and gentrification[89], areas in the Bay Area that have convenient access to transit are areas most likely to suffer gentrification and displacement, including SoMa.[10] The Central SoMa Plan talks about increasing land values as a primary reason for the underlying elements of the Central SoMa Plan, yet it does not adequately take into account the fact that increased land values cause speculation and displacement. The increased land values presented in the Central SoMa Plan's various "menu" options is a recipe for massive displacement of existing residents and small businesses.

O-SOMCAM-Cabande.8
(cont'd.)

Large-scale displacement creates a significant environmental impact when considering CEQA's "Vehicle Miles Travelled" standard. Working class and lower income households get displaced outside San Francisco and their commutes increase, increasing their "Vehicle Miles Travelled." When people who work in SoMa are displaced, they will often retain their employment in SoMa, therefore their "Vehicle Miles Travelled" will increase. Many existing residents in SoMa can not afford the luxury homes that are and will be built in SoMa and access to affordable housing is extremely limited, so if for any reason they need to move out, it's highly unlikely they will move be able to stay in the neighborhood.

Furthermore, much of the luxury housing that gets built doesn't provide housing even though it's approved by Planning to be residential housing units. When these units are used as "pied-a-terres" or "short term rentals" or "corporate rentals" or "student housing", they are not helping to alleviate any housing shortage, because although they are approved by Planning as residential use, they are not in fact used for residential purposes. Therefore people are being displaced and commuting farther for work, meanwhile the new housing units aren't necessarily supporting residents being able to live in homes close to their work.

Replacing low income residents with higher income residents replaces a population with lower car ownership with a population that has a higher rate of car ownership.[11] [12] More affluent people are also more likely to use ride-hailing/ TNC services than public transit. They have access to the smartphone-based apps and can pay more for a ride than public transit riders. This puts more single vehicles on the road that are idling and circling in their competition for fare-paying customers. There are also tech shuttles that service SoMa residents to take them to their offices on the Peninsula. The impacts of the increased "Vehicle Miles Travelled" caused by the new, more affluent populations which is encouraged in the DEIR is not considered in the document.

[8] http://ucconnect.berkeley.edu/transit-oriented-development-and-commercial-gentrification-exploring-linkages
[9] http://www.urbandisplacement.org/map/sf
[10] http://communityinnovation.berkeley.edu/reports/Gentrification-Report.pdf
[11] http://socrates.berkeley.edu/~raphael/BerubeDeakenRaphael.pdf
[12] http://www.sciencedirect.com/science/article/pii/S0965856400000185

This means that gentrification has a "quadruple" environmental impact by lengthening the commute times of people working in SoMa from their new place of residence outside of San Francisco; replacing these people with a population more likely to own and use automobiles; increasing the number of people living in SoMa as a "bedroom" community for their commute on a shuttle to the Peninsula; and increasing use of ride-hailing/ TNC services whose vehicles constantly idle and circle in competition for rides. None of these impacts of gentrification on the environment have been studied, which a significant flaw in the DEIR.

O-SOMCAM-Cabande.8 (cont'd.)

6. The DEIR Omits Analyses of the Current Trend of Residential Units Not Being Used as Traditional Housing

O-SOMCAM-Cabande.9

GC-13

Cities across the US and even Canada are learning that developers are not producing housing units to be used for housing people. Many cities are now fully realizing the negative impacts of the push to "build, build, build", an ideology fully embraced by this Central SoMa Plan. Footnoted here are examples of Vancouver[13] and New York City[14] that show that in world where real estate is solely developed as a commodity and home-sharing is corporatized, often new condos are not being occupied by local residents, or any people at all. Also footnoted is a map of vacant units in San Francisco indicating that many of our City's vacant units are in SoMa.[15]

We are not opposed to building new housing, but we feel that it is environmentally important to ask the question, who are we building new housing for? Without adequate controls and enforcement in place:

- SRO's in SoMa will not continue to be used as open and accessible affordable housing options;
- new condos will be affordable only as high end luxury housing or sitting vacant because they are owned by investors who have no intention of living in these units;
- new condos will be used as commercial "short term rentals" instead of as residential use;
- new condos will be used as "corporate rentals" instead of as residential use; and
- other buildings will be used as "student housing" instead of residential use.

The inadequacy of the DEIR is that it studies the impacts of residential development as though it will be used for residences. The environmental impacts of corporate rentals, short term rentals and other commercial uses are different from residential uses. Without sufficient controls and enforcement, there is no way to ensure that new housing that is incentivized to be built under this new land use Plan will be used as housing.

7. The 5M Project Must be Included in the DEIR Analysis

O-SOMCAM-Cabande.10

CU-2

[13] http://www.theglobeandmail.com/real-estate/vancouver/dark-windows-illuminate-problems-in-vancouvers-real-estate-market/article31822833/

[14] https://www.nytimes.com/2015/02/08/nyregion/stream-of-foreign-wealth-flows-to-time-warner-condos.html

[15] http://www.antievictionmappingproject.net/vacant.html

The DEIR has moved 5M from being “Plan-induced growth to cumulative growth” per footnote on p. IV-5. The problem is that 5M is the largest single development within the boundaries of the Central SoMa Plan Area. It created new rules for development (its own Special Use District) that were based on recommendations from a draft version of the Central SoMa Plan.

O-SOMCAM-Cabande.10 (cont'd.)

Furthermore, new development in the Central SoMa Plan Area is being proposed in this Plan at a scale that is conversely driven by the scale of development that Planning pushed to approve for 5M. With 5M being the largest single development in Central SoMa, they must be considered together in the Central SoMa Plan. They have linked, not dissociated as separate, cumulative impacts. 5M is not built and its construction timeline is not clear. 5M should be studied as a principal contributor to the environmental impacts of the Central SoMa Plan. The omission of any analyses of the impacts of the 5M project in the DEIR is a critical flaw of the DEIR.

8. **The Impacts of New Office Space and Lack of Local Hiring Requirements are Not Properly Presented or Studied in the DEIR**

O-SOMCAM-Cabande.11

PP-6

The DEIR is inadequate on the grounds that it does not incorporate all the City’s policies with respect to office space development controls. Page III-19 of the DEIR details the City’s pipeline of office developments with respect to Planning Code Section 321, which caps large office construction at 950,000 square feet per year. The way that this section III.C.2 is presented is unclear since there is additional office space development that is not subject to this cap because the cap only applies to “large office.” Furthermore, this section of the DEIR fails to incorporate the voter approved Proposition O passed in November of 2016, which significantly increased the large office cap to include an increased amount of office space at the Shipyard. The Plan is focused on constructing a massive amount of new office space and essentially makes SoMa a second Financial District (this is true for all the Project Alternatives as well). The DEIR’s lack of clarity on how it will comply with Prop M requirements, especially in light of the passage of Proposition O, is a critical flaw.

Given the intensity of new high-end office space that is being proposed, the fact that “local hiring and training goals” are still in the section of the DEIR called “Areas of Controversy and Issues to be Resolved” (p. S-79) is not only offensive to the community, but is potentially very damaging environmentally. With this approach, Planning is saying that new jobs in SoMa will be for people who are not current residents which indicates an in-migration of new people. Planning is also saying that current residents of SoMa will have to move somewhere else to find work. What are the environmental impacts of all this forced migration? This is not analyzed in the DEIR. Also, as new, more affluent people move into SoMa displacing current residents who live and work in SoMa, how much farther will those displaced workers have to travel and what is the resulting environmental impact? Again this is not analyzed in the DEIR.

9. **Consideration of Continued PDR Uses in Central SoMa is Inadequate**

O-SOMCAM-Cabande.12

PD-5

Page S-4 of the DEIR clearly indicates that Planning has not created an actual plan for Production, Distribution and Repair (PDR) uses in its vision for Central SoMa. This has historically been one of San Francisco's most important areas for PDR uses, which ensured a diversification of the economic base of the city and job opportunities for people with trade credentials, not just advanced university degrees.

O-SOMCAM-Cabande.12 (cont'd.)

The DEIR indicates that it is removing "protective zoning" for PDR, but there is no complete report of how much PDR has been lost since the implementation of the Eastern SoMa Plan, which was in part intended to protect against the loss of PDR. Creating "incentives to fund, build, and protect PDR uses" is problematic since features that appear to be incentives today will quickly not be incentives tomorrow depending on land use, financial, and capitalization macro conditions that are driving the development market at any particular time.

There are many innovative mixed-use building types, but the prospect of "require(ing) PDR space as part of large commercial developments" seems to be a limited application. It would be important to understand what precedent there is for such a mix of uses in new developments and how likely it would be to have PDR on the ground level of a large commercial tower. What kind of PDR would it be? Who would be employed?

For all PDR, we are concerned that there be increasing job opportunities for SoMa residents and diversification of San Francisco's economy. This will protect San Francisco against "boom and bust" cycles; it will ensure that there is less regional impact on the environment that comes when sectors of the economy are segregated geographically; and will therefore result in less "Vehicle Miles Traveled."

The Plan calls for adding technology jobs to SoMa, yet these jobs are largely inaccessible to existing community residents. SoMa needs a diversity of job types in the neighborhood that are not only accessible to community residents but provide a living wage that can support workers to stay in the neighborhood. This is highlighted especially in the types of jobs provided by production, distribution, and repair businesses that provide jobs for working class residents and are jobs that cannot afford to be lost. PDR businesses also provide essential support to other industries and sectors so should be proximate to those other functions for them to be viable and effective. More consideration of continued PDR use is required in the DEIR.

10. There is No Proof that the Plan will Accomplish its Goal of Alleviating Housing Prices or Maintaining a Diversity of Residents

O-SOMCAM-Cabande.13

OC-1

The Plan states as one of its main goals accommodating housing demand and addressing such demand to alleviate housing prices. The Plan, however, does not provide any studies or figures that support the claim that new development will drive down housing costs. As a result, the goal of the Plan of maintaining the diversity of residents, here in terms of socioeconomic makeup, appears empty. The Plan would cause a greater increase in the number of people living and working in the area than would be seen without the Plan, as shown in the DEIR. As the DEIR states on page V-10, "what effect development under the Plan would have on housing

affordability is a matter of considerable controversy," and that "the influx of real estate investment and higher income, residents may increase gentrification of a neighborhood, with displacement of households being a negative outcome."

O-SOMCAM-Cabande.13 (cont'd.)

Further study must be done regarding what effects new housing development will have on housing prices if the Plan is serious about its commitment to maintaining a diversity of residents in the area. If new housing development under the Plan-- the majority of which is market-rate-- cannot be proven to bring down housing prices, the Plan will then only work to exacerbate the gentrification and displacement crisis in the area. Studies must be done to address these facts if the Plan is to move forward in meeting its core goals, especially as they relate to affordability and maintaining a diversity of residents.

11. The Plan Continues to Provide an Inadequate Amount of Open Space in SoMa By Relying on POPOS

O-SOMCAM-Cabande.14

RE-1

The SoMa is the most open space deficient neighborhood in San Francisco[16], along with the neighboring Tenderloin. Instead of providing sufficient, green and publicly accessible open space, Planning has been defaulting to providing new open space for SoMa through Privately Owned Public Open Spaces (POPOS)[17]. POPOS have a negative impact on the community for many reasons:

- These spaces aren't truly open to the public, activity is discouraged and hours are limited;
- POPOS are not protected by the Proposition K Shadow Ordinance because they are not open spaces owned by the City's Rec and Park Department;
- Because there's no Prop K protection, it's difficult to establish a standard of shadow protection for these open spaces because CEQA is not specific on this matter;
- These spaces do not represent the type of open space that is public and accessible for use by youth, families, and seniors (like a public park); and
- POPOS overly regulate the types of activities allowed and have restrictive hours that limit access;

SoMa has such a lack of places for public recreation and truly accessible open spaces that there must be a clear plan for creating new public open spaces that are owned and managed by Rec and Park.

12. The Plan Does Not Address the Stabilization of SoMa based Non-Profit Organizations

O-SOMCAM-Cabande.15

OC-1

The Central SoMa Plan has no provision for stabilizing nonprofit organizations in the neighborhood. As studied by Supervisor Kim, MOHCD, and the Northern California Community

[16] http://default.sfplanning.org/publications_reports/library_of_cartography/OpenSpaceMap.pdf
[17] http://sf-planning.org/privately-owned-public-open-space-and-public-art-popos

Loan Fund, the escalation in property values, and the lack of commercial rent control has put nonprofit organizations at imminent risk of displacement.[18][19]

O-SOMCAM-Cabande.15 (cont'd.)

By encouraging the construction of a second financial district, commercial rents will become increasingly more expensive placing nonprofit organizations even more at risk. Low income and immigrant communities in SoMa rely on many of these nonprofit organizations for basic services and to be able to survive in the community. Without these organizations, SoMa residents will be further at risk for displacement.

As noted elsewhere in this letter, displacement does result in environmental impacts. Therefore, the DEIR is deficient in that it does not recommend strategies for stabilizing nonprofit organizations in SoMa.

13. The DEIR Does Not Adequately Study the Health Impacts from Increased Noise, Degraded Air Quality, Pedestrian Safety Hazards, and Increased Wind Speeds

O-SOMCAM-Cabande.16

WI-8

On page V-3, section V.B.6 "Wind" it says that "Subsequent future development anticipated under the Plan could alter wind in a manner that substantially affects public areas." Organizations that work with seniors and people with disabilities in SoMa are concerned that any increase in wind speeds caused by the heights and bulk of the proposed buildings in Central SoMa will cause a hardship and injury to seniors and people with disabilities at both public open spaces and in the public rights of way.

O-SOMCAM-Cabande.17

NO-1

Noise in SoMa is already the worst in the City.[20] Any increase in noise levels from construction incentivized by the Central SoMa Plan (p. VI-44 says it would be "significant" and that Mitigation Measure M-NO-2a "would be insufficient to reduce the construction-related noise impacts to a less than significant level" on p VI-45). Noise levels especially from construction activity have not been studied in the DEIR. Also after construction, the degraded air quality from increased traffic, increased idling from vehicles stuck in traffic or increased ride-hailing vehicles, or from increased truck traffic will all have detrimental impacts.

O-SOMCAM-Cabande.18

AQ-1

O-SOMCAM-Cabande.19

TR-9

We are also concerned about the vulnerability of seniors and people with disabilities while walking in the neighborhood to injury from vehicle collisions. Providing sidewalk extensions may help in some areas, but the extent of increase in automobile traffic is under-reported in the DEIR, and the potential incidents of pedestrian injuries from automobiles is also under-estimated. These environmental impacts are not sufficiently studied in the DEIR.

Conclusion: Preparation of the DEIR Did Not Sufficiently Allow for Public Input

O-SOMCAM-Cabande.20

GC-3

[18] https://www.ncclf.org/npdmitigation/

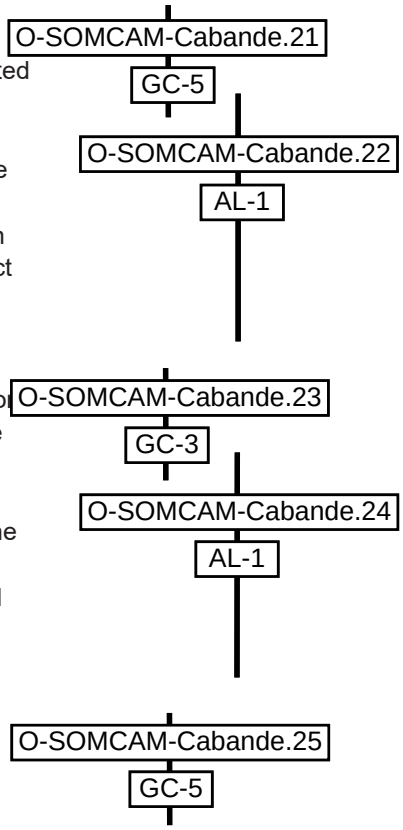
[19] https://sfgov.legistar.com/View.ashx?M=F&ID=2730532&GUID=77CFF0CE-7AC6-4569-ACEE-D2568711018F

[20] http://default.sfplanning.org/publications_reports/library_of_cartography/Noise.pdf

The Central SoMa Plan DEIR is inadequate and should be revised with the additional suggested studies and recirculated to address the critical flaws we outlined above. Going forward, a version of the Central SoMa Plan that creates a family-friendly neighborhood would be SOMCAN's preferred alternative. We are recommending that Planning study a new alternative that supports growth of SoMa in a way that supports the needs of current and future youth, families and seniors. None of the alternatives currently outlined in the plan supports this vision or these needs, and instead will reshape SoMa to be San Francisco's second Financial District with little regard to the protection of the environment of existing residents, small businesses, non-profits and PDR spaces.

The preparation of this DEIR did not adequately allow for incorporation of community input. For example, the boundaries of the Central SoMa Plan changed significantly during 2016, and the public was not sufficiently noticed. Despite SOMCAN's history in engaging with a diverse and large constituency in SoMa, SOMCAN was not provided an opportunity to participate in TODCO's "community alternative", and therefore we can not endorse this alternative. While the Mid-Rise Alternative has intriguing elements, it does not come close to being a vision that we can embrace. The changes in boundaries, the brief public comment on the published DEIR all make it impossible for the SOMCAN, its members and the larger SoMa community to adequately assess the Plan or any of its proposed alternatives.

As a public disclosure document, the Central SoMa DEIR is wholly insufficient and a new alternative should be studied that fully supports families and seniors in SoMa, and the DEIR should be recirculated for public input and review.



Sincerely,

Angelica Cabande
SOMCAN
Organizational Director

Joseph Smooke
SOMCAN
Board Chair

O-SPG

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February 13, 2017

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Re: Central SoMa Plan, Planning Department Case No. 2011.1356E
Comments on Draft Environmental Impact Report

Dear Ms. Gibson:

O-SPG.1
PD-1

On behalf of Solbach Property Group ("Solbach"), we submit the following comments on the Draft Environmental Impact Report ("DEIR") for the Central SoMa Plan ("Plan"), Planning Department Case No. 2011.1356E.

Solbach is the owner of 636-648 Fourth Street (Block 3786 / Lot 035), a 17,406 square foot parcel at the northwest corner of Fourth and Bluxome Streets within the proposed Plan area located ½ block from the Caltrain Station and one block from the Bryant Street Central Subway stop. The property is currently within the MUO zoning district and 85-X height and bulk district, and is within a subarea of Plan proposed for intensive commercial and residential development and substantial height limit increases.[1]

Solbach has submitted an Environmental Evaluation application to the City and County of San Francisco ("City") for a proposed mixed use development project ("Project") at the property, consistent with the objectives of the Plan. The Project proposes to demolish two existing non-historic one- and two-story commercial buildings[2], a parking lot and a general advertising sign structure, and construct a primarily residential tower with ground floor commercial space. Solbach's preferred development scenario for the Project is a not less than 350-foot tall tower containing not less than 392 dwelling units, of which approximately 18% (at least 71 units) are proposed to be on-site affordable units. The tower would have maximum floor

[1] DEIR at IV-22: "Substantial height increases would also be concentrated south of Bryant Street, from east of Fourth Street to Sixth Street. Many sites within this area would increase from the current height limit of 30-85 feet to 130-400 feet."

[2] Neither on-site building is a designated or eligible historic resource. DEIR at Figure IV.C-2.

O-SPG.1 (cont'd.)

plates of approximately 10,785 square feet and be spaced more than 115 feet away from any adjacent towers, consistent with the bulk limits proposed in the Plan. At the proposed height, the Project would need to construct off-site open space by developing much of the Bluxome Linear Park, proposed in the Bluxome Street right-of-way between Fourth and Fifth Street adjacent to the Project site (DEIR at II-31), whereas a smaller project could fulfill almost all of its open space requirement on-site.

The preferred Project is fully consistent with the objectives and goals of the Plan, including:

- Objective 1 ("Increase the capacity for jobs and housing");
- Objective 5 ("Offer an abundance of parks and recreational opportunities"); and
- Objective 8 ("Ensure that new buildings enhance the character of the neighborhood and the City").

See DEIR at II-5 to -6.

The Project is among the several dozen "Subsequent Development Projects" that are described as projects that would proceed under the Plan, if approved. On page IV-8, the DEIR indicates that these projects are analyzed not as cumulative developments, "but rather in the Plan analysis, as the proposed uses and intensity of development would be allowed under the Plan." The Project is described as including "a 350-foot-tall primarily residential tower with 427 units." This scale and density of development, consistent with Solbach's proposed Project, was therefore included in the DEIR's analysis of potential physical impacts of the Plan.

However, elsewhere in the DEIR, this intensity of development for the Project site appears not to be properly analyzed. For example, the proposed height map at Figure II-7 of the DEIR shows a proposed height limit of 250 feet for the property, not 350 feet. Height limits of 400 feet and 300 feet are proposed on sites on which residential towers are proposed immediately adjacent to the Project site . A 250-foot height limit on a 17,406 square foot site cannot accommodate anything close to the 427 units that the DEIR states was analyzed in the Plan DEIR.

The DEIR is therefore inadequate for its failure to fully examine at least 350 feet as the preferred height limit for the Project site, despite (1) the DEIR stating that intensity of development is analyzed in the DEIR, (2) the policies of the Plan being more fully implemented by a development of 350 feet at the Project site, (3) higher height limits on adjacent residential sites, and (4) the lack of any significant differences in environmental impacts between a 250-foot tall structure and a 350-foot tall structure at the site, as discussed in further detail below. The Final EIR should provide a consistent analysis of the physical impacts associated with a height limit of at least 350 feet at the Project site.

Notably, such a clarification in the Final EIR is permissible without the need to recirculate the DEIR. Recirculation is only required where significant new information is added, which includes the following situations: (1) a new significant environmental impact from the

O-SPG.1 (cont'd.)

project or from a new proposed mitigation measure; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the significant environmental impacts of the project but is not adopted; or (4) the DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. *See* 14 C.C.R. § 15088.5(a). On the other hand, recirculation is not required where the new information added to the EIR "merely clarifies or amplifies." *See* 14 C.C.R. § 15088.5(b). Here, Solbach merely seeks clarification as to the potential impacts of a 350-foot height limit at the project site and amplification of the potential impacts associated with development at that height.

Moreover, any such analysis will establish that there is no significant difference in terms of environmental impacts between 250 feet (the height limit indicated in Figure II-7) and at least 350 feet (the proposed height for the Project as described on page IV-8) and will not change the conclusions of the DEIR.

- Visual Impact. A preliminary visual simulation analysis was completed in December 2016 for the proposed Project at various heights, from 250 feet to 450 feet, attached hereto as Exhibit A. The visual simulations establish little to no change in aesthetic impacts between 250 feet and 450 feet in height. This is further supported by the conclusions of the DEIR itself, which found that taller buildings "would alter or partially obscure long-range views of the Bay . . . but not to the extent that any view would be substantially impaired." (DEIR at IV.B-38). The Plan already proposes 400-foot and 300-foot height limits for sites in the immediate vicinity of the Project site. The DEIR concluded that development pursuant to the Plan would have a less-than-significant impact on views and scenic vistas. In any event, skyline and other visual impacts are not considered significant effects for urban infill projects: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Pub. Resources Code, § 21099(d)(1).)

- Transportation. The Project is located in TAZ 644, where vehicle miles traveled are substantially less than the regional average for both residential and retail land uses (DEIR Table IV.D-7), such that the Project will have no significant traffic impacts at the density proposed, particularly because the Project will be subject to the newly enacted TDM ordinance. Transit, pedestrian, bicycle, emergency vehicle and construction impacts of a 392-unit project at the Project site would not differ significantly from those analyzed in the DEIR should the transportation analysis for the DEIR have assume less than that density of development for the site.

- Shadows. PreVision Design prepared a shadow screening analysis, taking into account existing buildings, for a 350-foot tower at the Project site, attached as Exhibit B. The initial analysis finds no new shading from a 350-foot project would be cast on any Recreation and Park Department properties or any of the other open spaces listed in Table IV.H-1 and analyzed in the DEIR. A 350-foot tower would cast some minor new shading on China Basin Park (a park under the jurisdiction of the Port of San

O-SPG.1 (cont'd.)

Francisco) and the privately owned publically-accessible Willie Mays plaza in front of AT&T park during limited hours of the year. Both open spaces are outside the Plan area. As discussed in the DEIR, a detailed shadow analysis and compliance with Planning Code Sections 295 and 148 will be required for the proposed Project at any height, including 350 feet (or higher). (DEIR at IV.H-9 and -10).

- Wind. With respect to wind, the DEIR concluded that wind hazard criterion were not exceeded with existing plus Plan conditions in the area of the proposed Project. (DEIR at IV.G-11). Thus the proposed Project, even assuming a 350 foot (or higher) height limit, would be unlikely to create wind hazards. Additionally, a detailed wind analysis specific to the Project will be completed for the Project's site specific CEQA analysis pursuant to DEIR Mitigation Measure M-WI-1, which requires further analysis of potential wind impacts for each tower proposal and compliance with the comfort criteria of Planning Code Section 148.

- Noise and Air Quality. The Project at 350 feet in height (or higher) would have similar noise and air quality impacts as a shorter building and be subject to the same Noise and Air Quality ordinances and Mitigation Measures that would reduce potential impacts to less-than-significant.

Should the Planning Department believe that a 250-foot height limit for the Project site also be analyzed in the Final EIR, such a lower scale of development is already analyzed in the DEIR as an element of the Reduced Heights Alternative (see DEIR at Figure VI-1).

Finally, the proposed height limit of 350 feet or higher better implements the policies of the Plan than a lower height limit. This is particularly true with respect to increasing the capacity for housing, one of the Plan's eight overall goals. Among the stated policies or objectives of the Plan are (1) increasing the area where space for housing can be built, (2) increasing how much space for housing can be built, and (3) increasing height limits on parcels. Each of these is better served by allowing increased height on the proposed Project, which allows for increased residential space.

We appreciate the opportunity to present these comments, and to request that the FEIR be amended to incorporate them prior to certification.

Very truly yours,

Steven L. Vettel

cc: Carlton Linnenbach, Solbach Property Group

SLV:llc
Enclosures

EXHIBIT A

636 4TH ST

VIEW STUDIES
12.09.16

ARCHITECT

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2

view from dolores park

VIEW STUDY

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view from dolores park
VIEW STUDY

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view from dolores park
VIEW STUDY

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view from twin peaks
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6

view from twin peaks
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view from twin peaks
VIEW STUDY



view north of downtown skyline

VIEW STUDY

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view north of downtown skyline

VIEW STUDY

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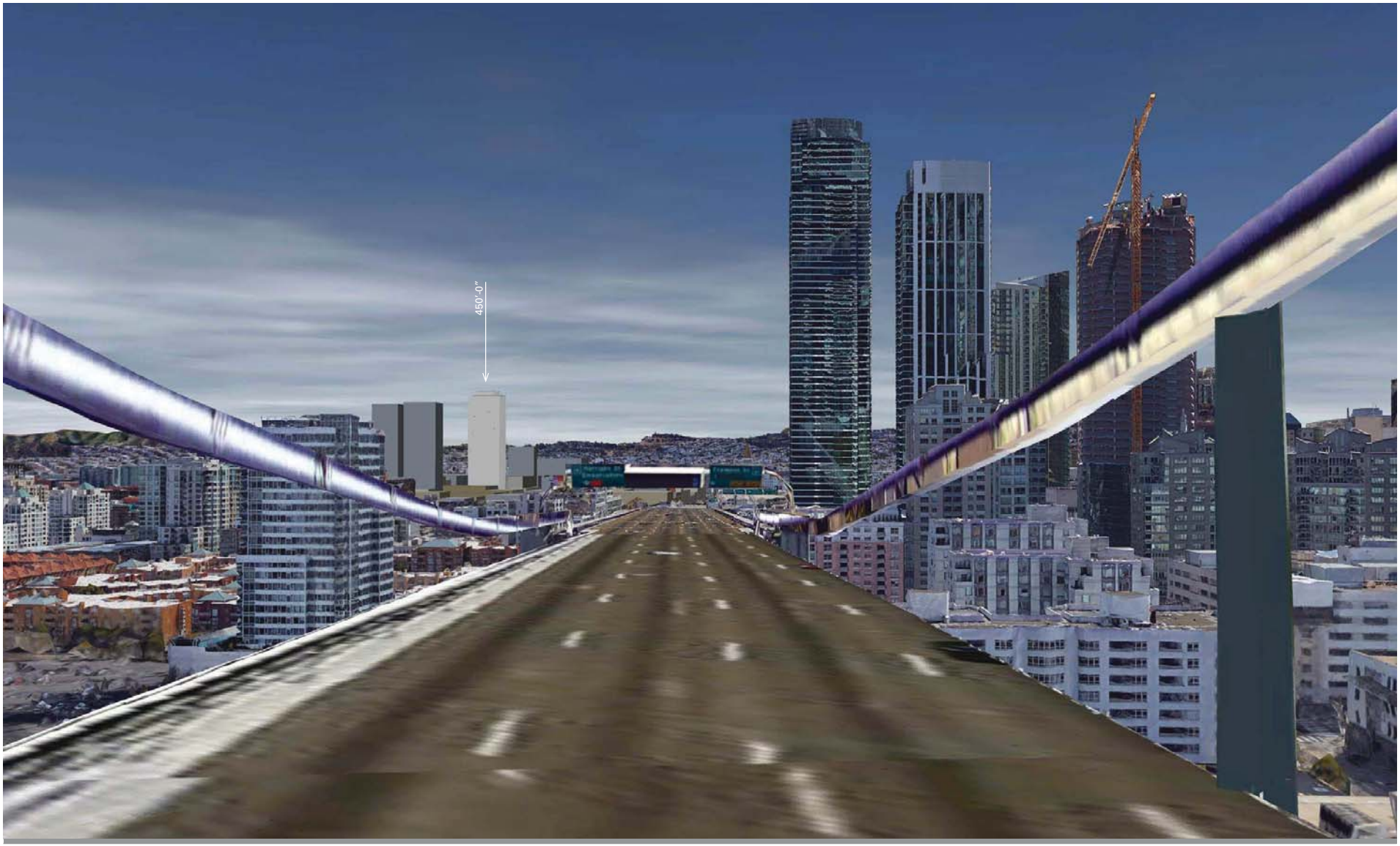


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view north of downtown skyline

VIEW STUDY

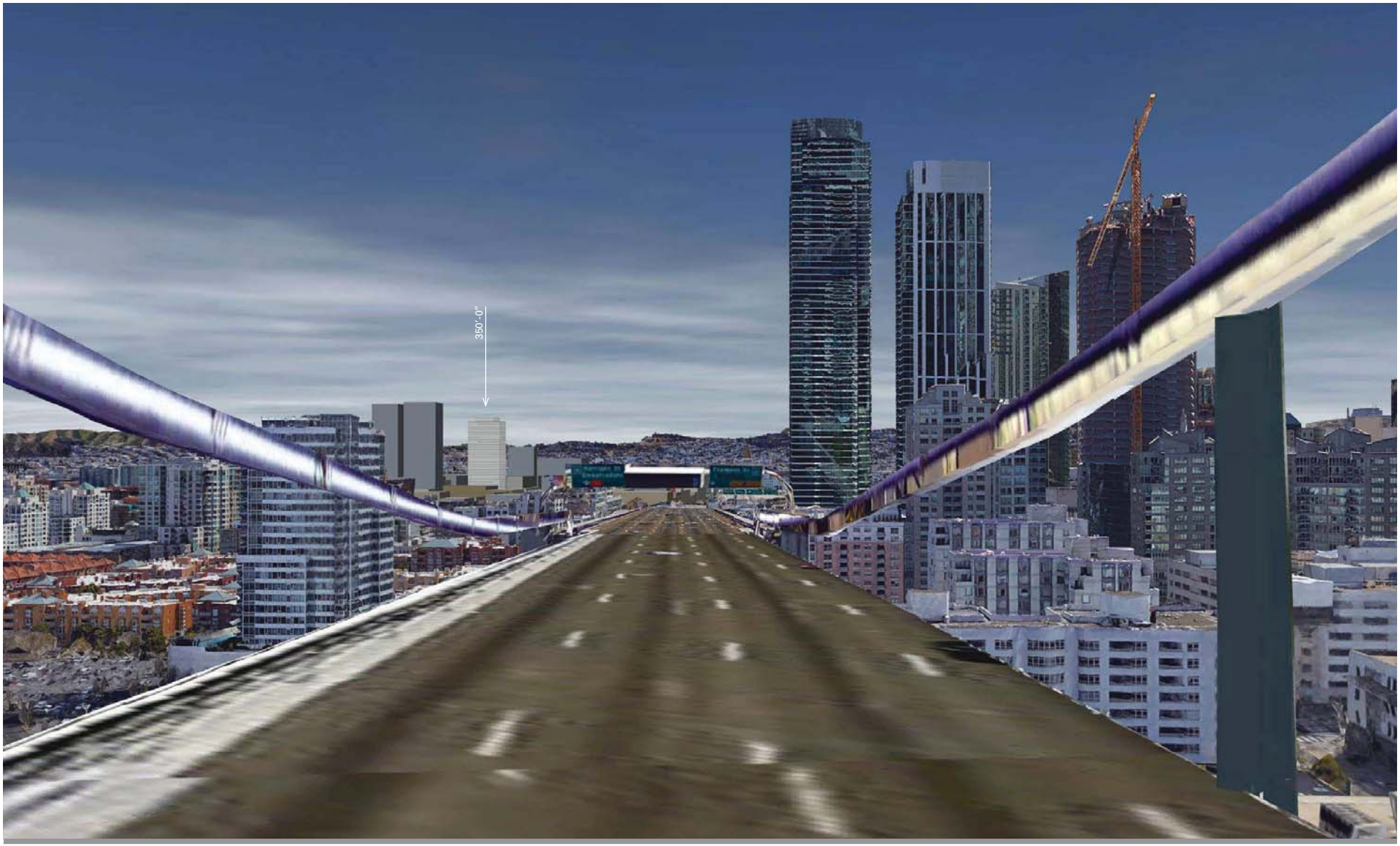
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view from bay bridge

VIEW STUDY

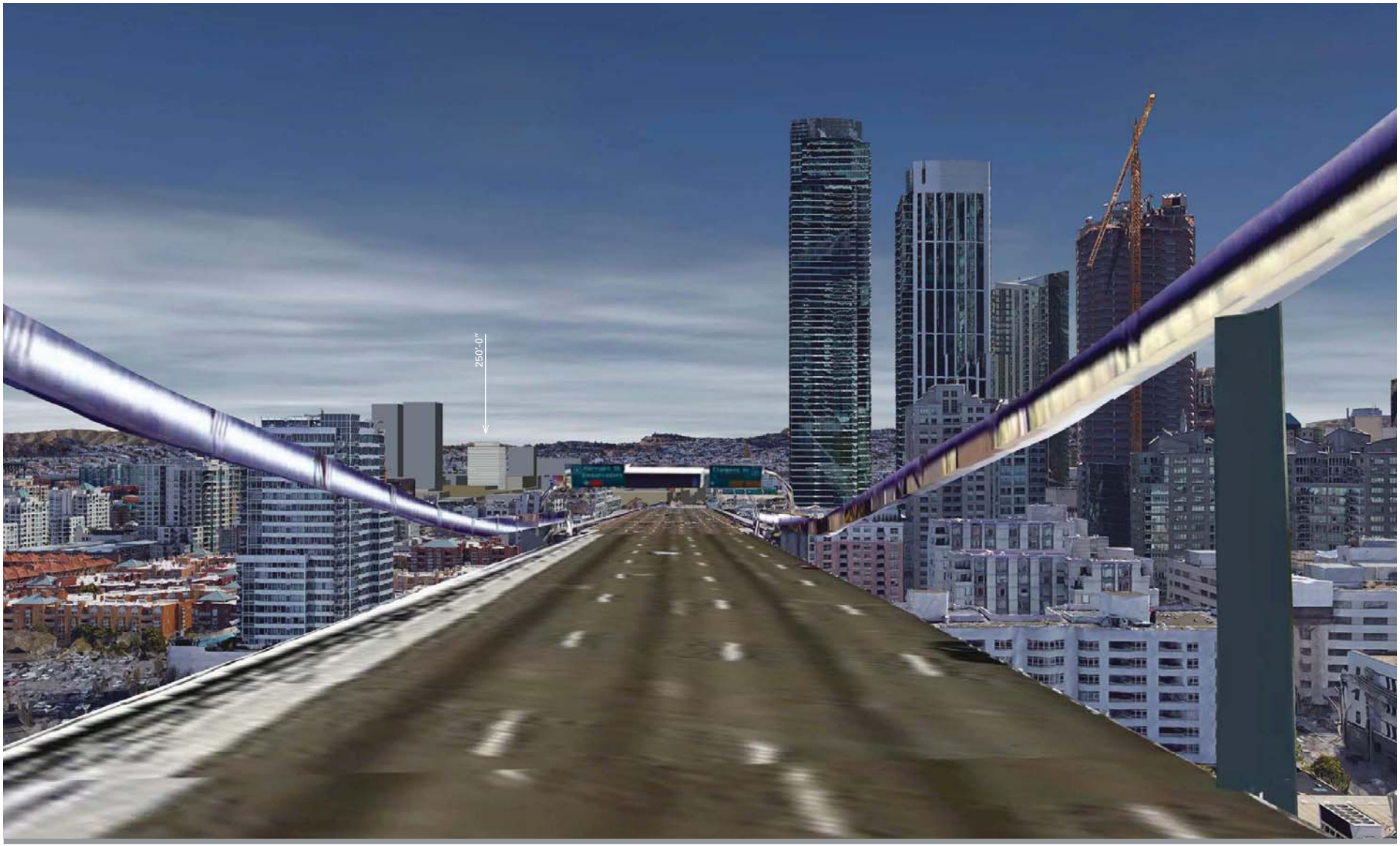
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view from bay bridge

VIEW STUDY

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view from bay bridge

VIEW STUDY

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view south of soma skyline

VIEW STUDY

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view south of soma skyline

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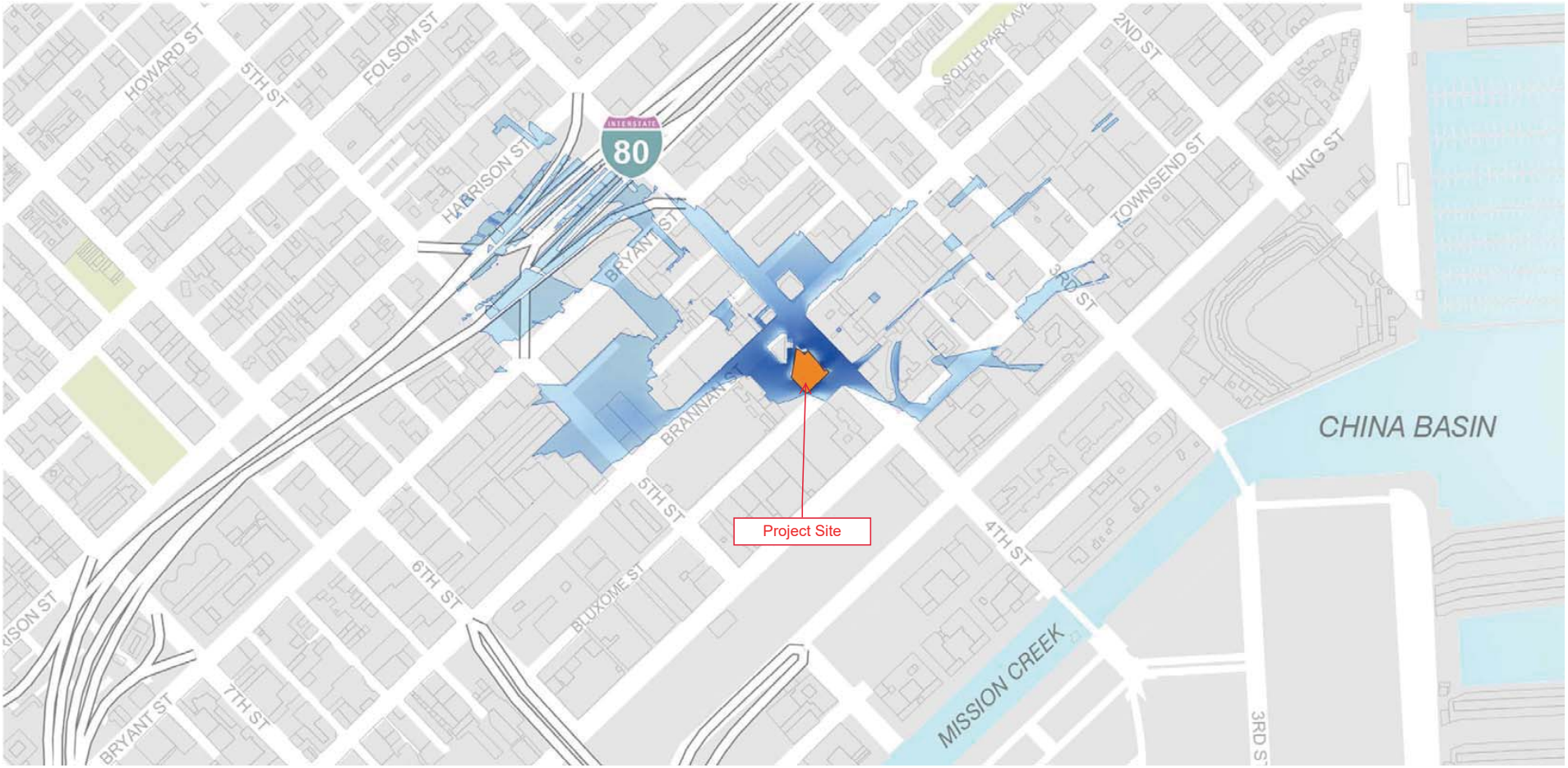
view south of soma skyline

VIEW STUDY

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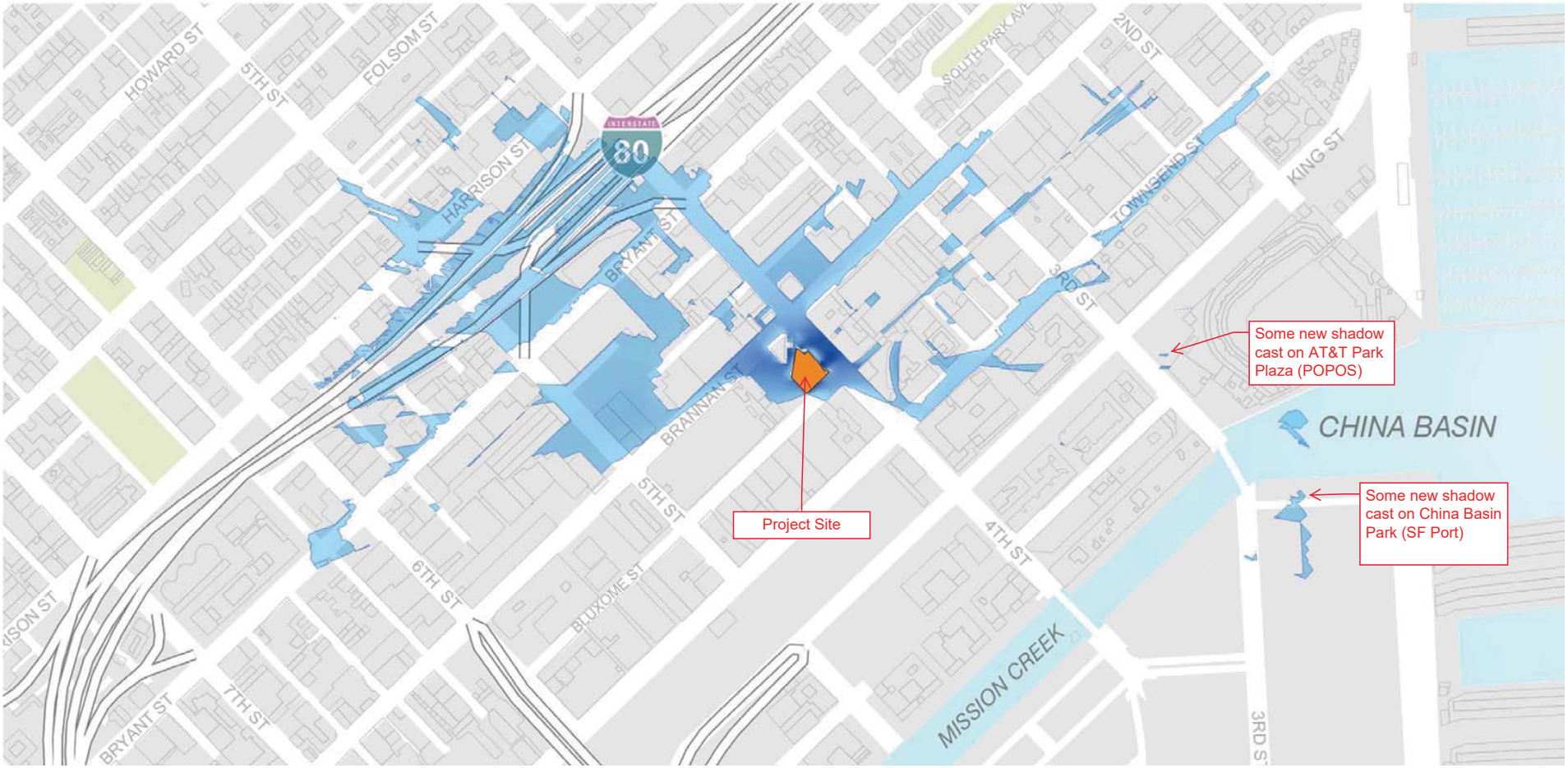
EXHIBIT B

636 4th Street: Initial Impact Screening Analysis



250' Tower Variant: Screened Annual Shadow Fan (factoring in shadow from existing buildings)

636 4th Street: Initial Impact Screening Analysis



350' Tower Variant: Screened Annual Shadow Fan (factoring in shadow from existing buildings)

O-Tishman

REUBEN, JUNIUS & ROSE, LLP

February 13, 2017

Via E-mail and Messenger

Lisa M. Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
Lisa.Gibson@sfgov.org

Re: Central SoMa Plan DEIR Comments – 598 Brannan Street and 655 Fourth Street Developments
Our File No.: 6250.19

Dear Ms. Gibson:

Our office represents Tishman Speyer, the developer of both a proposed mixed-use office, retail, and residential project at 598 Brannan Street (the "**598 Brannan Project**"), and residential project at 655 Fourth Street (the "**655 Fourth Project**") in the proposed Central SoMa Plan area.

This letter contains comments on the Draft Environmental Impact Report ("**DEIR**") for the Central SoMa Plan, published on December 14, 2016. The comments are arranged below by DEIR section and page number.

Chapter II - Project Description

Page:	Comment:
II-22	The first full paragraph on this page states "the project would allow for…five 160-foot buildings and about a half a dozen buildings of 130 feet in height in the area south of Harrison Street…"

O-Tishman.1
PD-2

James A. Reuben | Andrew J. Junius | Kevin H. Rose | Daniel A. Frattin | John Kevlin
Tuija I. Catalano | Jay F. Drake | Lindsay M. Petrone | Sheryl Reuben[1] | Thomas Tunny
David Silverman | Melinda A. Sarjapur | Mark H. Loper | Jody Knight | Chloe V. Angelis
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	In discussing allowable development heights in this area, the DEIR should address draft Central SoMa Plan Implementation Measure 8.5.1.2, which states that "An additional 25 feet of height may be permitted on sites where such flexibility in height would facilitate the provision of affordable housing and/or public parks and recreational facilities beyond what would otherwise be required by the Plan, as long as that additional height did not increase the overall amount of development otherwise enabled by the Plan or cause new significant impacts related to wind and shadow." This could be done by referencing the DEIR discussion in Objective 8.5, which occurs on page II-23. It is feasible for the 598 Brannan Project may include buildings up to 185 feet in height along Brannan Street, and up to 155 feet in height along Bryant Street. In addition, the draft Plan identifies at least 9 areas south of Harrison that would be zoned 130-CS. These areas incorporate multiple parcels, and many therefore contain he capacity for development of more than the "half a dozen" buildings of 130-feet or less that the DEIR indicates.

O-Tishman.1 (cont'd.)

Chapter III - Plans and Policies

Page:	Comment:
III-11	Recreation and Open Space Element. The second to last paragraph on this page states that Plan height limits are intended to protect, "insofar as is feasible, a potential park side identified in the Plan on the block bounded by Fourth, Fifth, Bryant, and Brannan Streets." It should be noted that the proximity of nearby existing buildings and development anticipated under the Plan for adjacent parcels will necessarily result in substantial shadow to this proposed park site.
III-20	The first paragraph on this page identifies 598 Brannan Project as a "700,000 square-foot building." This should be revised to reflect the project's description, submitted in connection with the current environmental evaluation application. The 598 Brannan Project is anticipated to contain approximately 984,429 square feet of office.

O-Tishman.2
SH-1

O-Tishman.3
PP-1

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Chapter IV.A – Environmental Setting, Impacts, and Mitigation Measures

Page:	Comment:
IV-8	Subsequent Development Projects. The 598 Brannan Project description should be amended to reflect development of 984,429 square feet of office, and 75,075 square feet of ground floor commercial area (Retail / PDR), and 104,800 square feet of residential (approximately 100 dwelling units). The proposed park area should be amended to approximately 43,000 square feet. The 655 Fourth Project should be amended to reflect development of two towers extending to a height of approximately 400 feet with below-grade parking.

O-Tishman.4
OV-1

Chapter IV – Environmental Setting, Impacts, and Mitigation Measures
Section D - Transportation and Circulation

Page:	Comment:
General	The 598 Brannan Project will require on-site loading accessible from Welsh Street, due to the fact that such access is not desired along Brannan or 5th Streets. Current parallel parking spaces (and also perpendicular parking that is obstructing on the public right of way) utilized on Welsh will need to be eliminated in order to allow room for truck turning radius to and from the project's proposed loading access points and sidewalk widening along Welsh as proposed by the Central SoMa Plan. This should be acknowledged within the DEIR's discussion of parking and loading impacts for the area.

O-Tishman.5
GC-6

Thank you.

Very truly yours,

REUBEN, JUNIUS & ROSE, LLP

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O-VEC

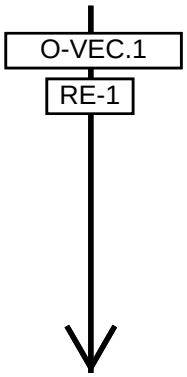
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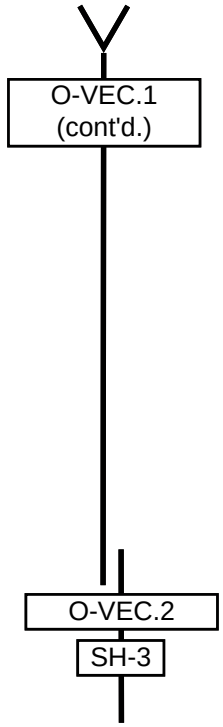
Re: Central SoMa Plan Draft EIR, Case Number: 2011.1356E

This letter is the Veterans Equity Center's response to matters contained therein Central SoMa Plan Draft Environmental Impact Report (hereafter "DEIR"), as referenced above. The Veterans Equity Center (VEC) has served thousands of residents through core services and programs for multiple decades in the South of Market (SoMa) community. Some of these core services and programs have included community services (social services assistance, education, computer literacy, program/activities, translation services, public benefits assistance, etc.), immigrant services (legal clinic counseling and services, food assistance program in partnership with the SF Food Bank and assistance from the ARC of SF), Mano Po (intergenerational internship between youth/students and seniors in conjunction with the Student Action for Veterans Equity (SAVE)), and BiSHoP (tenant counseling, education, housing services including application completion and case management, referrals, etc.). BiSHoP has continued to be a critical program specifically focused on the housing needs of priority populations in San Francisco, primarily of whom live and/or work in the SoMa community, by providing housing education, direct services, referrals, and tenant counseling.

We, at the VEC, have watched our neighborhood change slowly during these years and are deeply concerned about the rapid changes and significant impacts proposed by a multitude of projects. The Central SoMa Plan proposed for an area generally bounded by Market Street, Townsend Street, 2nd Street and 6th Street, as outlined in the DEIR, identifies neighborhood strengths, challenges, and possible mitigation tools; however, after review of said DEIR, participation in community meetings hosted by the Planning Commission, and extensive communications with other community based organizations, VEC finds that the DEIR has certain inadequacies requiring further assessment or analysis and has additional questions and concerns regarding the plan area that we hope the Planning Department can address.

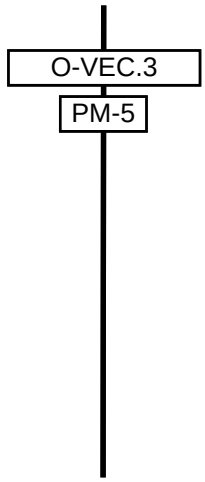


A. Open Space



VEC recognizes that the only public park within the Plan Area is South Park and so the creation of new public open space is limited, especially in anticipation of the increased number of residents in the Plan Area. Thus, the Plan looks to the inclusion of POPOS to "ensure that new buildings enhance the character of the neighborhood and the city" (II-17). VEC requests that the Planning Department releases the regulations of Planning Code Sections 135 and 138 in a manner that is easily accessible for local residents and workers to understand. This will provide the opportunity for community members to understand what the current regulations are and engage in further discussion to provide input on additional design guidelines for future POPOS within the Plan Area. For example, some existing community discussions around POPOS have included: more accessible operational standards especially standards of accessibility for people with disabilities; additional amenities such as children's play areas; game tables and seating; open air cafés, kiosks, or food service in adjacent retail spaces[1]. We want to ensure that should future developers opt to create POPOS, that these forms of open space are of high quality, accessible, and help address the lack of recreational open space in the South of Market. Lastly, we ask the Planning Department to extend Proposition K shadow analysis to POPOS. Shadows impact the quality and accessibility of open space and we look to the Planning Department to address these concerns especially if it is recommended that POPOS be used to address the limited open space in the Plan Area.

B. Youth and Family Zone



It is stated that the current "plan proposes no change to the SoMa Youth and Family Zone SUD" (IV.A-7). The Planning Department should consider the expansion of the Youth and Family Zone SUD especially to support the efforts of community organizations and the SoMa Stabilization Fund to stabilize the families that live in the district. Bessie Carmichael/Filipino Education Center was ranked number 5 in the "most dangerous elementary school zones in California" according to study derived from data from the CA Highway Patrol SWITRS & California Department of Education. Additionally, according to Hamilton Family Services, 116 of 640 students at Bessie Carmichael (K-8) are homeless (2014). Conditional use authorization is essential in creating a safe and livable environment for these youth and families. We are also looking to expand the district to include seniors as we have many SRO's and senior housing within the plan. While the Plan stresses housing and jobs, we are also requesting that the Central SoMa Plan support these efforts to expand the SUD for existing and future youth, families, and seniors.

C. SoMa Pilipinas

[1] https://www1.nyc.gov/site/planning/plans/pops/pops-plaza-standards.page

VEC is a member of SoMa Pilipinas: San Francisco's Filipino Cultural Heritage District. With our participation in the creation of the cultural heritage district, we have advocated for the preservation of community cultural assets such as services targeted for immigrants, seniors, and families. While all these assets are not necessarily considered "historical resources," we appreciate the Plan's recognition of the Gran Oriente as a historic resource with potential future landmark status (IV-C-28). We also seek the recognition of the following community assets located within the Plan Area: 6th Street Lodginghouse Historic District, Filipino Education Center (824 Harrison), Philippine Heroes Square (Lapu Lapu Street, Bonifacio Street, Mabini Street, Tandang Sora Street, Rizal Street), San Lorenzo Ruiz Center (50 Rizal Street), and Bindlestiff Studio (185 6th Street). Having these properties designated as historic resources could potentially prevent "substantial adverse change" (IV.C-50) of these spaces which are frequented and cherished by many members of the Filipino American community in San Francisco and the larger Bay Area.

O-VEC.4

CP-5

VEC also has concerns regarding impact standards and mitigation measures relating to historical resources and cultural heritage assets. While we recognize that "intangible cultural heritage assets" are not necessarily regulated as historical resources under CEQA (IV.C-48) and that "projects that comply with the [Secretary of the Interior's Standards for the Treatment of Historic Properties] can be exempted from CEQA review" (IV.C-49), we urge the Planning Department to regulate future projects within the Plan Area so that they comply with the vision of SoMa Pilipinas and support existing assets within the cultural district (as mentioned previously). In terms of the mitigation measures that were outlined in the Draft EIR towards reducing the impact towards historical resources such as documentation or oral histories, we request that there be a deeper conversation about how future projects could also work with SoMa Pilipinas groups and residents to limit "significant and unavoidable" (IV.C-60) changes to historical resources and the cultural heritage of the district.

O-VEC.5

CP-2

D. Transportation

Much of the analysis focused on the present and future impacts of transportation within the Plan Area is in accordance with the outdated San Francisco Planning Department's 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (IV.D-1). However, these guidelines do not include analysis of TNC vehicles (e.g. Lyft, Uber, etc.) or private transit buses (e.g. Chariot). We request that the Planning Department provide a study and deeper analysis on the impact of these alternate vehicle transportation within the Plan Area. The plan should include proposals for regulations for these types of transportation and identify additional passenger loading/unloading zones within the plan area that will prevent congestion and be safe for pedestrians and drivers.

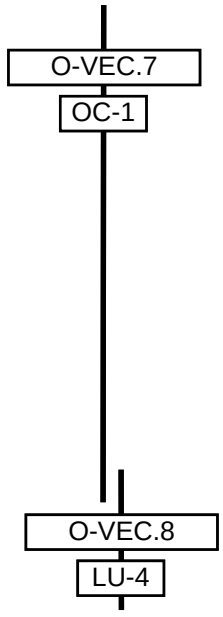
O-VEC.6

TR-7

E. Office Space and Housing

Office:

The DEIR indicates that Central SOMA Plan corresponds to the Plan Bay Area's planning in which it estimates "approximately 92,000 additional housing units and 191,000 additional jobs would be added in San Francisco by 2040" (II-4), however Plan Bay Area also indicates it "also does not mandate any changes to local zonings, general plans and project review"[2]. VEC is very concern that this plan will create a second Financial District and that much of the regional growth will be very much concentrated within the area plan, from 2nd St to 6th St, rezoning of, including but not limited, to residential areas into office developments. The DEIR did not mention how the rezoning will impact the residential areas into office developments as seen in Figure II-3 where there are areas specifically starting from 3rd St and Folsom St to 6th St and Folsom St are homes to our clientele e.g the San Lorenzo Ruiz Center. The DEIR did not also map the current affordable housing buildings within the area plan. This analysis should be included in the DEIR and how those current residents will be impacted into the rezoning of this area. Although the DEIR briefly addresses that the Central SOMA Plan will conflict with East SoMa Plan, it did not resolve the proposed high-rise developments of the proposed area plan to mid-rise residential plan of Eastern Neighborhood Plan, such transitions should be addressed in how will this affect the character of the neighborhood.



Moreover, the DEIR fails to address the total amount of square footage of office developments within this plan and whether this is in accordance of Prop M aka Office Development Annual Limit. Although the DEIR briefly addresses the Prop M limitation, we request that the Planning staff addresses how Plan Bay Area affects the current city's legislation in place.

Housing:

The DEIR mentions that the Plan will address the housing needs by meeting "at least 33% of new housing to very low, low and moderate income" (II-13) yet it fails to include analysis of State Density Bonus Program which will allow for developments to increase heights without guaranteeing that additional affordable housing units will be built on-site. For example, the 333 12th St. development by Panoramic Interests was the first to use State Density Law without providing additional affordable units, settling to 13.5% instead of 18%, in accordance to Prop C which was passed last year. Although this development was outside the proposed Central SOMA Plan, the decision by Planning Commission last December set a precedent to upcoming

[2] http://mtc.ca.gov/sites/default/files/0-Introduction.pdf

developments adjacent to this area plan. In this proposed plan, how will the State Density Bonus Program effect construction of new residential developments?

O-VEC.10 (cont'd.)

Moreover, South of Market is home to many seniors and people with disabilities. Many senior services are also located in the neighborhood and serve many senior and people with disabilities who may not reside within the area plan. According to *Assessment of the Needs of San Francisco Seniors and Adults with Disabilities*, by *San Francisco Human Services Agency Planning Unit*, while "the median market rate for one bedroom apartment is $3,880 per month ($46,560 per year), the median household income for a single senior is around $22,000" and "adults with disabilities living alone report a median annual income closer to $12,000". The DEIR rarely mentions seniors and people with disabilities when it comes to their housing needs and fails to map potential sites for senior housings that are close to transit systems and services in proximity to the area plan.

O-VEC.11

PH-2

Although DEIR mentioned numerous areas of controversies that need to be resolved such as potential displacement to residences and businesses or its socioeconomic impacts, it did not exactly incorporate the potential socioeconomic impacts to be preventative. As the DEIR explains that the Central SoMa Plan is in accordance to Plan Bay Area goals, there are situations in the neighborhood that are already problematic and that Central SOMA Plan may fail to address the exacerbating displacement and affordability crisis. For example, South of Market are already seeing conversions of SROs into co-op for housing for tech workers. The DEIR fails to address the practices or scenarios that are already prominent in the neighborhood that leads to greater displacement and homelessness.The DEIR also did not address the issue of homelessness where there is a shelter within the area plan (i.e MSC South) and some encampments within the area plan. The DEIR should provide study of where people live or stay and how will they be affected by this proposed area plan.

O-VEC.12

OC-1

O-VEC.13

OC-4

ENVIRONMENTAL

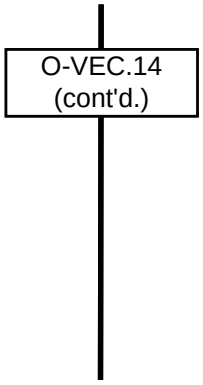
F. Combined Sewer System

Central SoMa's combined sewage and stormwater drainage system falls within the largest, overused Channel Drainage Basin (covering the Tenderloin, all of SoMa, the Mission, Potrero Hill, Haight, parts of Pacific Heights, the Panhandle, Castro and lower Richmond) . Although the analysis of the drainage system's treatment facilities were very detailed, our concern is that many of the plans to upgrade the system by SFPUC were planned to happen as a result of the growth projected by Eastern Neighborhoods in 2012. Much of the analysis of the millions of gallons per day was based off of a 10 year PUC study that did not capture the density of growth over the past five years nor the fact that we have been in a drought. As a result, the

O-VEC.14

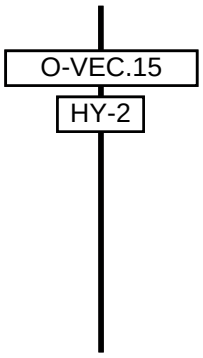
HY-1

review of the plan's impacts on sewage and stormwater drainage were said to be less than significant DURING DRY WEATHER. However, during wet weather months, the overflow and its effects on the water treatment capacity are significant. When the wastewater treatment facility is past capacity, sewage/stormwater is strained, mixed with chemical disinfectants and released into the Bay. We would like to see a full analysis of this process, based on the frequency of how often this occurs (how many days per months) during wet weather months and what are the environmental impacts of these waste disinfectants. We would also like to have a detailed cumulative projected analysis of the millions of gallons per year generated annually by construction related projects, and how much that amount (what %) contributes to the overall projected analysis.



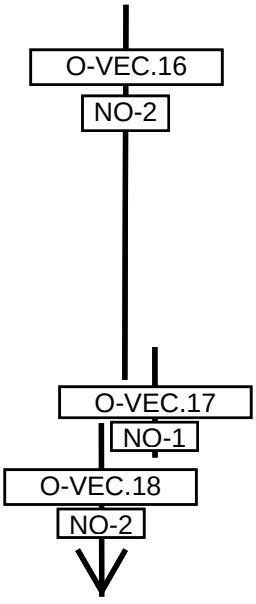
G. Water Level

The DEIR identifies that nearly ⅓ of the plan area will be inundated with 3-8 feet of water due to sea level rises. However, the SFPUC is undergoing a plan to address sea level rises that will not be complete until 2018. The idea is to add an adaption plan. However, the Central SoMa plan will begin facilitating new development as soon as it is adopted. We feel as if the impact of the sea level rising between 5th and 6th Street (halfway in the middle of the entire neighborhood) has significant impact that should be studied prior to the adoption of this plan. Many of the community benefits of affordable housing, open space and neighborhood retail were projected to occur in this area, and with rising flood levels, the cost burden on our community would be tremendous.



H. Noise

The DEIR states that 74% of the South of Market neighborhood has unhealthy decibel levels ranging in excess of 70 db. Due to an increase of intensity of traffic and construction, the Central SoMa Plan would increase that percentage to 83-86% of the South of Market. Some suggestions to alleviate these impacts are to stay indoors. This measure conflicts with the effort to have workers and residents walk to public transportation. SoMa Street grids are some of the largest blocks in the nation. As a result, in order to access parks, schools, businesses or transit, stakeholders are expected to walk nearly twice as long as the rest of the city's neighborhood blocks. And although there are efforts to decrease car ownership and usage, the Environmental Review is silent on the glut of Uber, Lyft and other pick up services that have saturated the Central SoMa region. The SoMa neighborhood also has nearly 50% of the major construction projects within San Francisco. However, the annual measurement of these construction related noises is not measured cumulatively. Lastly, sounds resonating off of the high rises along Rincon Hill, Transbay and Moscone Plan Areas should also be further analyzed, as Central SoMa



developments will be occurring under very different landscape conditions than previous construction.

O-VEC.18 (cont'd.)

I. Air Quality

With the implementation of the current Central SoMa Plan, Environmental Review identifies that nearly the entire SoMa neighborhood will be under the Air Pollutant Exposure Zone (APEZ). This means residents, visitors and workers will be exposed to harmful air particles, gases and heavy metals that have been proven to cause cancer, asthma and other chronic health impacts. Although staff have identified that many of the impacts will be significant and avoidable, efforts to mitigate negative impacts have been focused on vehicular patterns, speed of travel and reduction of parking. In many new high rise developments, exposure to pollutants can be filtered out. However, for low income residents, small businesses, nonprofits, park and school users, these mitigations will be out of reach. Planning needs to look at mitigation efforts that help the entire community. This should include frequent and accessible educational efforts by air quality professionals, funding for health screenings and treatments, and capital funds for filtering systems to be added to older developments and public facilities.

O-VEC.19

AQ-2

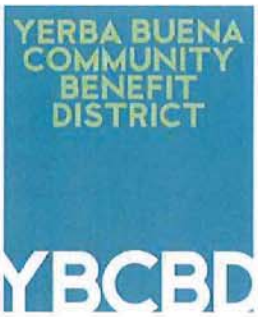
We request that these areas raised here be addressed with proper mitigation measures, identified in the DEIR. We look forward to working together to reach an amenable resolution, in the most efficient and timely manner. Please feel free to contact us, if you seek further discussion or comments.

Thank you for your time and attention to these matters.

Sincerely,

Chris Durazo, Theresa Imperial and Caroline Calderon
Bill Sorro Housing Program
Veterans Equity Center
1010 Mission Street, Suite C
San Francisco, CA 94103

O-YBCBD



February 13, 2016

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

RE: Central SoMa Plan Draft Environmental Impact Report

Dear Ms. Gibson,

On behalf of the Yerba Buena Community Benefit District Board of Directors, this letter includes our comments on the Central SoMa Plan Draft Environmental Impact Report (EIR) issued in December 2016.

After careful review and much discussion, we submit to you questions, comments, and requests for additional study.

- **Pedestrian Safety**
  - The Central SoMa Area includes many of the City's most serious high injury corridors and intersections, as referenced in the City's Vision Zero Plan. The EIR mentions numerous ideas to improve pedestrian safety, such as corner sidewalk extensions, sidewalk widening, signal timing upgrades, mid-block crossings, and opening closed sidewalks. However, the only pedestrian safety mitigation in the EIR focuses on crosswalk improvements. While crosswalk improvements are beneficial, only the combination of improvements listed in the EIR will significantly improve pedestrian safety. With this in mind, we request additional pedestrian safety mitigations to be included in the EIR.
  - It's not clear if pedestrian scrambles (diagonal crosswalks) were studied as part of signal timing upgrades. Please clarify.
  - What analysis was done on the possible re-opening of the crosswalk on the north side of Folsom Street at 3rd Street? Did you factor in that the Moscone Center South Loading Dock entrance has moved closer to Folsom Street? This is a particularly hazardous intersection for Moscone Center operations. In the absence of additional study, we recommend not including a crosswalk at this location at this time.

O-YBCBD.1
TR-9

O-YBCBD.2
TR-9

- **Street Network Changes/Loading and Unloading**
  - The north curb lane of Folsom Street between 3rd and 4th streets is important to operations at Moscone Center. It is often utilized for queuing freight trucks and/or shuttle buses. In addition, the new Moscone Center South Loading Dock entrance on 3rd Street has shifted south, closer to the Folsom Street corner. Large trucks making the turn from Folsom Street onto 3rd Street and into the loading dock entrance will require a wider swing, often from the 2nd or middle lane of Folsom Street. It's critical that the north curb lane of Folsom Street between 3rd and 4th streets remains unchanged and available for this purpose.

O-YBCBD.3
TR-10

5 Third Street Suite 914 San Francisco, CA 94103 415 644 0728 [T] 415 644 0751 [F] WWW.YBCBD.ORG

- The proposed mid-block pedestrian crossing on Howard Street between 4th and 5th streets is another hazardous area for the operations of the Moscone Center and the Intercontinental Hotel. The Moscone West Loading Dock Entrance/Exit and the Intercontinental Hotel Valet Entrance are both located in this immediate area and operate 24/hours a day. Installation of a mid-block crossing at this location will present safety, operational and other conflicts and should not be considered at this time.

O-YBCBD.4
TR-9

- **Transit Demand and Effectiveness**
  - Given the expected increase in residents and businesses in the Central SoMa Plan Area, how is the City planning to meet the subsequent increased demand for public transit and pressure on the streets? Are transit route/schedule changes being considered to meet this demand?

O-YBCBD.5
TR-8

  - While we are generally supportive of more dedicated bike and/or MUNI lanes, we are concerned about potential changes near Moscone Center that will impact their business. Making it more difficult to move people and freight efficiently could result in the loss of business and millions in revenue to the City.

O-YBCBD.6
TR-10

  - The Central SoMa Plan Area includes freeway on and off ramps that increase vehicle congestion in the area. With the expected increase of people living and working in the area, deliveries will increase. To reduce conflicts, what mitigation efforts can be employed when on-street and off-street loading areas aren't sufficient?

O-YBCBD.7
TR-10

We commend the thoroughness of the Central SoMa Plan Draft EIR and the work of the Planning Department. We look forward to working in partnership with you to ensure safe navigation, active and open public spaces, and an increased quality of life for all who live and work in the area.

Sincerely,

Scott Rowitz, Vice Chair
YBCBD Board of Directors

Cathy Maupin
YBCBD Executive Director

CC: Supervisor Jane Kim

O-YBNC-Elberling

The Yerba Buena Neighborhood Consortium

c/o 230 Fourth St. San Francisco, CA 94107
A Council of the Yerba Buena Neighborhood's Residents and Community Organizations

Lisa Gibson
Acting Environmental Review Officer
San Francisco Department of City Planning
1650 Mission Street
San Francisco, CA 94103

February 13, 2017

RE: Central SOMA Plan DEIR: 2011.1356E

This DEIR is legally inadequate per CEQA for the following reasons:

1. Not only does it fail to evaluate the CSP's project-specific and cumulative South of Market-wide impacts of 10's of thousands of new residents and workers on Public Services, as detailed in our Comment of January 17, it thereby also fails to identify those impacts as cumulatively Significant and then propose Mitigation Measures as required by CEQA.

   O-YBNC-Elberling.1
   PS-2

   Any competent analysis will confirm that new SOMA resident households and workers will add demand for hundreds if not thousands of new childcare slots, and that in fact the existing supply of childcare facilities is already known to be insufficient for the current SOMA population. As a Mitigation Measure our TODCO Community Plan proposes that space for new childcare facilities with required outdoor area be required to be included in all new office developments on sites bigger than one acre.

   O-YBNC-Elberling.2
   PS-1

   A competent analysis will confirm that existing public recreation facilities are insufficient for the cumulative needs of current plus future SOMA households, especially indoor facilities. There is now just one no-charge public indoor basketball facility, no public swimming pool, and no other public recreation facilities of other common types. Many do exist in private clubs in SOMA, but these are expensive and so not realistically available to all current and future households. There is also insufficient City funds set aside to build such facilities in the future. As a Mitigation Measures our TODCO Community Plan proposes that space for such new public recreation facilities be required to be included in all new office developments where feasible, and/or as a priority criteria for discretionary allocation of Prop M office allocations, and that the proposed Community Facilities District authorized scope include funding of construction and operation of no-fee public recreation facilities anywhere in South of Market, not just Central SOMA.

   O-YBNC-Elberling.3
   RE-2

What stands out from the CSP and its DEIR is that the Department claims it wants a family-friendly San Francisco, but that it doesn't really mean it – won't do what it takes to make that happen in real life. Actions – or lack thereof – speak for themselves, far louder than words.

O-YBNC-Elberling.4
PM-1

John Elberling
Chair

Cc: Susan Brandt-Hawley

O-YBNC-Light-1

The Yerba Buena Neighborhood Consortium

c/o 230 Fourth St. San Francisco, CA 94107
A Council of the Yerba Buena Neighborhood's Residents and Community Organizations

Lisa Gibson
Acting Environmental Review Officer
San Francisco Department of City Planning
1650 Mission Street
San Francisco, CA 94103 January 19, 2017

RE: Central SOMA Plan DEIR: 2011.1356E

The discussion of the Howard/Folsom street project in the DEIR is incomprehensible, and therefore inadequate. The convoluted and fractured way the information is presented makes it impossible for anyone who is not a transit engineer to understand.

O-YBNC-Light-1.1
PD-4

Figure II-15 and Figure II-16 are insufficient in depicting the consequences of the alternatives. They show the one-way and two-way proposals, but critical information is missing. Given the complexity and scope of the changes proposed, clear graphics are needed to consolidate and clearly present the changes and their impacts. As it is, the information is confusing and incomplete, broken up, and at times leaves out key information. It requires the reader to dissect various sections, compare them, and digest large amounts of information that should be clearly summarized in easy to understand graphics.

- **There is no graphic depicting the <u>impacts</u> of the proposed changes**. It is not clear what the impact of the different alternatives is at each intersection, and how the Level of Service (LOS) changes under each.
- The 2-way option must clearly show changes to Left turns under the proposed plan. Currently, to find graphic information on Left turns one must go to the Appendix – which is not accessible to everyone – and search through, diagram by diagram, to find the correct one. And those graphics in the appendix only show the physical design change, not the service impact to that intersection. **A graphic is needed that identifies where left turns will change under the 2-way alternative, where they will/won't be allowed, where provisions for left turns will cause additional delays, or where no left turns will improve congestion.**
- Bay Bridge on-ramps and queueing should be shown in a single graphic for each proposal, so it the differences can be easily compared. This should include impacts to congestion, which in some cases will result in increased congestion and in others will result in reduced congestion, depending on the street and ramp/queue locations.

O-YBNC-Light-1.2
TR-6

The proposed changes to Folsom and Howard need to be detailed in a single section with full graphic display of the impacts. Without that, we cannot understand what is going to happen to our neighborhood.

O-YBNC-Light-1.3
PD-4

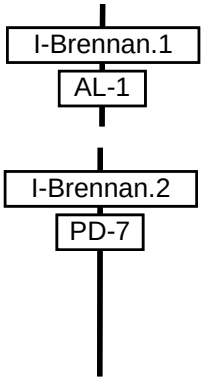
Sincerely,
Alice Light, TODCO, Director of Community Planning

I-Brennan

Nicole Brennan

I would like for the Central SoMa Plan to include more housing. I appreciate the number of jobs the plan permits, and I think transit-oriented, dense housing would be a great compliment to those jobs. I want more housing at all income levels. Please consider adding more housing to the plan, or creating an alternative plan that allows for more dense, infill housing.

I would also like to see Annie Street closed to cars again. It was nicer that way, and the only people impeded were people who inexplicably chose to drive private vehicles into the heart of the city for office jobs that are on top of BART and Muni. The sidewalks are crowded, and will get more crowded as the Transbay Terminal comes into use, so more pedestrian spaces are an important priority for me and the many other D6 residents who don't own cars or prefer to get around without them. Please do not sacrifice the pedestrian elements of the plan when/if compromises need to to be made about space allocations.



I-Camp

On Feb 13, 2017, at 3:30 PM, Daniel Camp <dwcamp89@gmail.com> wrote:

Hello,

I-Camp.1

AL-1

My name is Daniel, and I wanted to quickly send in my comments on the Central SOMA Plan. I am a San Francisco resident who works in SOMA. While I appreciate that the current plan seeks to accommodate the rapid job growth the Bay Area has seen in recent years with a large mount of new office space, I am extremely concerned about the lack of housing relative to said job growth.

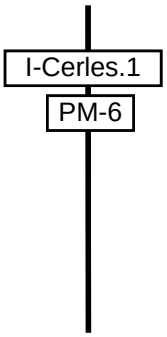
If we choose to accommodate a large amount of jobs/office space in this area, we MUST also build new housing for the workers to live in. Failing to do so will only increase housing costs in the immediate area (which are already extremely expensive), and force workers + existing residents to seek housing in other areas. Every person who is displaced from the housing market in this area will be one more body clogging our mass transit systems or freeways; this plan in its current form is socially and environmentally irresponsible.

In summary, I support keeping the amount of jobs/office space the same, but strongly urge you to increase the number of housing units. The EIR for the Central SOMA Plan should analyze an alternative scenario that include more housing.

Thank you,
Daniel Camp

I-Cerles

Marty Cerles Jr



There are too many restrictions on building market-rate housing. The only way that San Francisco will lose the distinction of having the highest rents in the country is if we allow market-rate housing to be built unabated. However, this plan seems to ignore that fact and makes developers jump through hoops, as well as increases the cost of building homes, a cost which the developers then pass on to renters in the form of higher rent. The Planning Department, which has "planned" to make sure San Francisco has the highest cost of living in the country, is truly doing a disservice to all the native San Franciscans who cannot qualify for affordable housing but cannot afford the highest rents in the country. Shameful.

I-Domalewski

From: Armand Domalewski <armanddomalewski@gmail.com>
Sent: Monday, February 13, 2017 4:56 PM
To: Jon Schwark
Cc: Gibson, Lisa (CPC); richhillissf@yahoo.com; Richards, Dennis (CPC); Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Christine (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Breed, London (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS); Fewer, Sandra (BOS); Kim, Jane (BOS); Peskin, Aaron (BOS); Ronen, Hillary; Safai, Ahsha (BOS); Sheehy, Jeff (BOS); Tang, Katy (BOS); Yee, Norman (BOS); Rahaim, John (CPC); Rodgers, AnMarie (CPC); Joslin, Jeff (CPC); Varat, Adam (CPC)
Subject: Re: [sfbarentersfed] Central SoMa Plan EIR Comments

Planning Department Staff, Members of the Planning Commission, and BOS,

I-Domalewski.1

AL-1

My name is Armand Domalewski. I live in the Tenderloin; every day I witness the human price of generations of bad city planning. Folks who might have afforded to cling onto an SRO with their social security checks just a few years ago are rotting on our street, and the lucky ones amongst us who can go to sleep with a roof above our head and food in our bellies are live in the constant fear that we are just one bad week away from joining our neighbors in the street.

You don't need me to tell you that, despite recent progress, the housing situation in San Francisco is bad.

Really bad.

What you do need me to tell you, apparently, is that the zoning changes you are proposing represent a continuation of the dangerous thinking that lead us to where we are today. For decades, we have approved more office space than housing---we have encouraged the gap to grow and grow, to the point that displacement is wrecking the community that I love and traffic is ensnaring the streets we adore.

Enough is enough. Add more housing to this plan.

Thank you,
Armand Domalewski
925-212-3562

Angelo Ferro
559 6th Street
San Francisco, CA 94103

I-Ferro, A

January 26, 2016

Commissioner Rodney Fong
President of Planning Commission
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Subject: Comments on DEIR for Central So Ma Plan

Dear Commissioner Fong:

I-Ferro, A.1
PD-3

I own properties on Sixth Street between Bryant and Brannan Streets and generally support height increases and more intensive use of the Central So Ma Plan area. However, review of the proposed project's land use and height/bulk limitations reflect several proposed projects. An example of this is the proposal to reclassify the height/bulk and use district of the Flower Market site from 40/55X to 270-CS and 160-CS, while the height of the adjacent parcels is proposed to be limited to 55' along Sixth and Bryant Streets, and the parcel at the north west corner of Bryant and Fifth Street is proposed to be changed to 85'.

I-Ferro, A.2
PP-9

The zoning for the Central So Ma Plan bounded by Second, Townsend, Sixth and Bryant Streets is proposed to be reclassified as MUO, which allows housing, except for the lots adjacent to the proposed mixed use development on the Flower Market site which would be reclassified to WMUO that does not allow housing. See section 845.20. The location of the lots proposed to be zoned WMUO are close to the Central Subway currently under construction. These lots are within two blocks of Muni Line #8 (Bayshore), within 1 1/2 to two blocks from Muni Line #10 (Townsend) and Muni Line #19 (Polk), with in one-half block of the east bound and one block from the west bound Muni Lines #27 (Bryant) and #47 (Van Ness).[1] City's planning policy encourages new housing in locations with easy access to multiple transit lines, the change to WMUO contradicts that policy.

I-Ferro, A.3
AL-1

I and other property owners in the area request a new alternative with two variants to be included in the EIR. This alternative will:

Variant 1

- Increase the height of Block 3778, lots 16, 17, 18, 19, 51, 22, 23, 25, 26, 52 to 67 and 32, 68-87, 16, 46, 46, 46D, 46E, 46F, 46G, 46H on the south side of Bryant Street or fronting on Sixth Street and/or Morris Street from the existing 40/55X or 65-X to 85';

[1] When the Central Subway is completed,

I-Ferro, A.3 (cont'd.)

- Reclassify of the entire block of 3778, and lots 48 and 49 of block 3777 to MUO;

- Decrease the proposed 270-CS to 160-CS in Block 3778 so that the height of the taller buildings will increase as they get closer to the CalTrain Station on Townsend Street. This change will allow for tall buildings on Townsend Street between Fourth and Sixth Streets that overlook the Caltrain station; and

- Incorporate NCT zoning along Fourth, Sixth and Folsom Streets.

Variant 2

This Variant will be the same as Variant 1 except that the 270-CS portion of the flower Mart site would remain.

Finally, residential buildings up to 85' high under the Planning Code are less costly to construct than high rise structures resulting in new housing units that are more affordable.

Thank you for your consideration.

Sincerely yours,

Angelo Ferro, Property Owner at:
517 6th Street Block 3778 Lot 051
519 6th Street Block 3778 Lot 019
525 6th Street Block 3778 Lot 018
559 6th Street Block 3778 Lot 017
538 6th Street Block 3779 Lot 167
550 6th Street Block 3779 Lot 120

Figure 1.4

PROPOSED ZONING

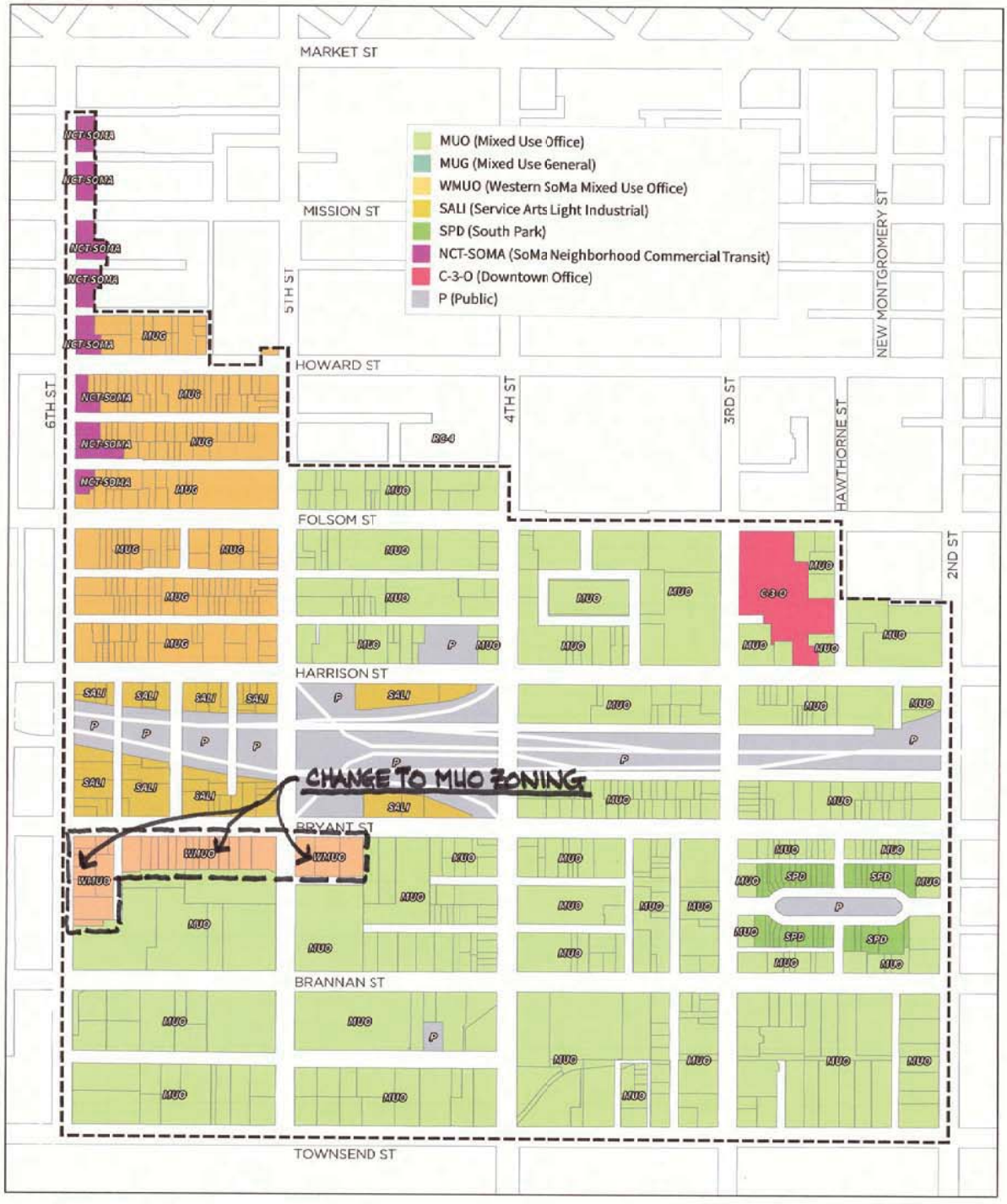
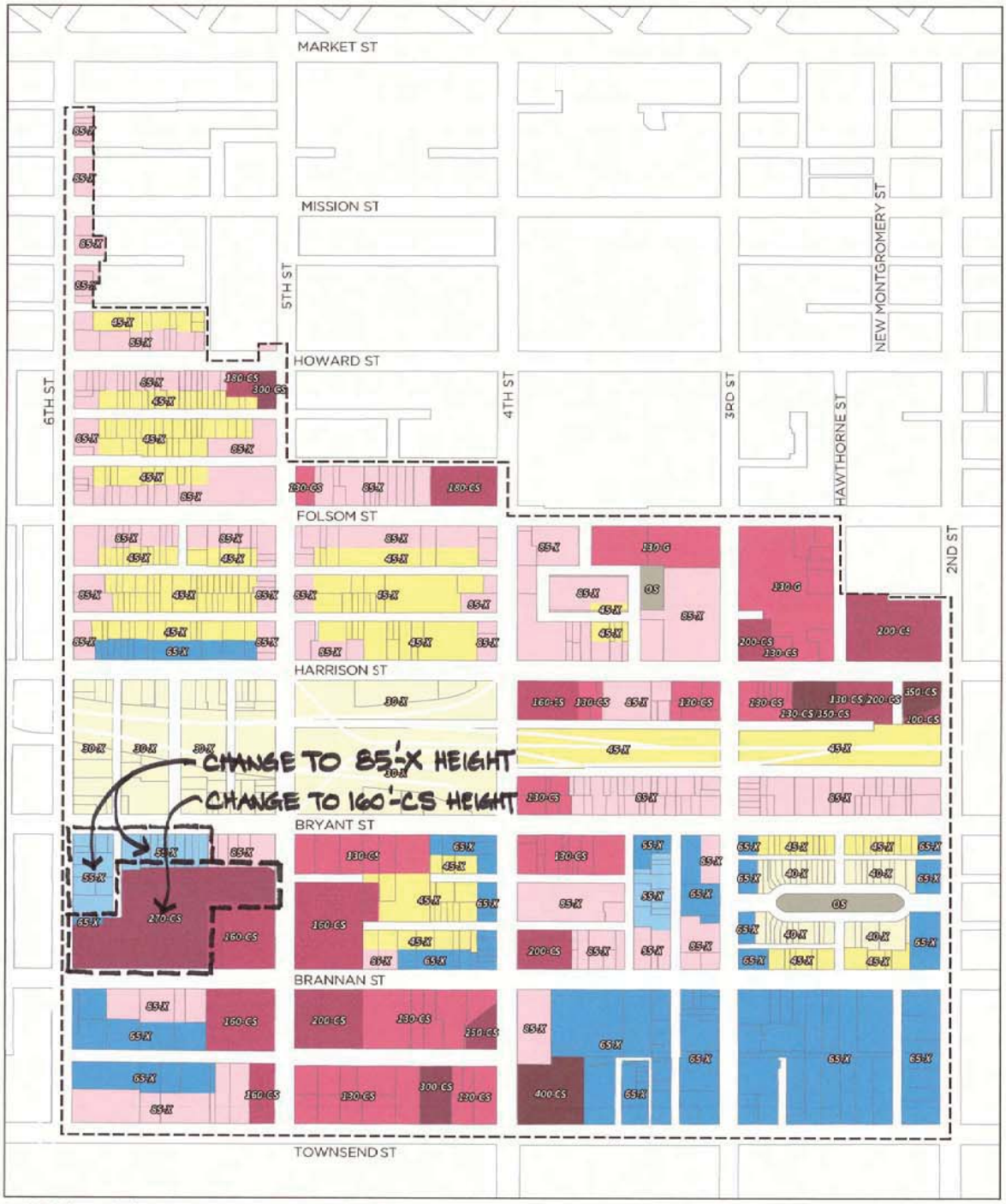


Figure 1.8

PROPOSED HEIGHT AND BULK LIMITS



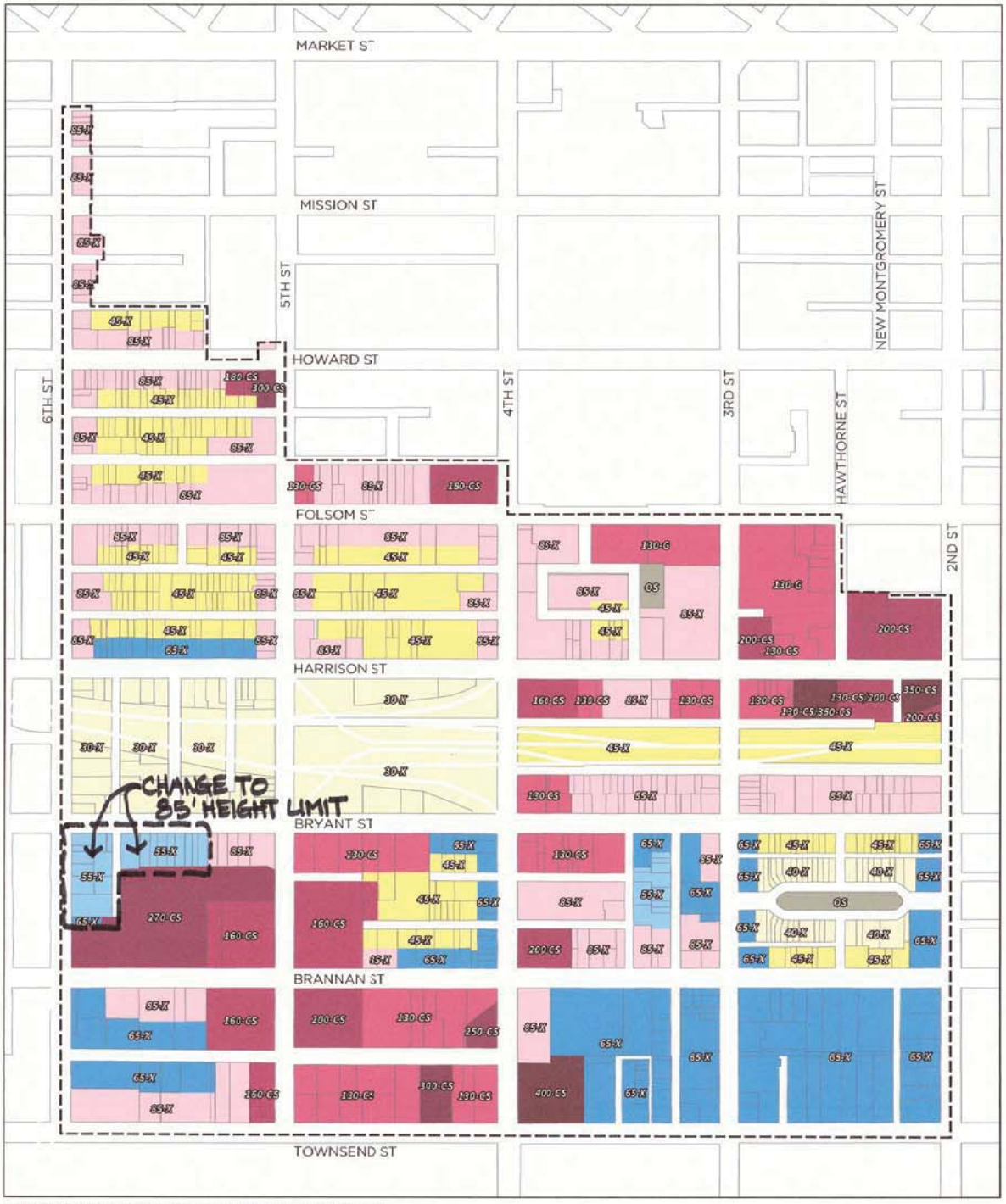
For "CS" bulk controls reference the Central SoMa Implementation Matrix.
For all other bulk controls, reference Planning Code Section 270.

1,000 Feet

559 6TH STREET VARIANT 1

Figure 1.8

PROPOSED HEIGHT AND BULK LIMITS



For "CS" bulk controls reference the Central SoMa Implementation Matrix.
For all other bulk controls, reference Planning Code Section 270.

1,000 Feet

559 6TH STREET VARIANT 2

I-Goldstein

JOSHUA GOLDSTEIN

I-Goldstein.1

GC-9

Though not directly related to any impact of the plan, I think the city should either name or request that one of the POPOS in the area be named after Jack Kerouac. There are a number of locations in the city named for him, but I think one area that has escaped much notice in this respect is the area around the Caltrain Station. Kerouac worked as a breakman for Southern Pacific on the trains that would eventually become Caltrain. Many locations in or around the planning area are explicitly mentioned in his poem "October in the Railroad Earth". The Bluxome St. Linear Park and suggested POPOS at 4th and Townsend seem ideal locations to name after Mr. Kerouac.

I-Hestor-1

SUE C. HESTOR
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February 13, 1017

Michael Jacinto
Environmental Review
1650 Mission St #400
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Lisa Gibson
Acting ERO Environmental Review
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San Francisco CA 94103

Comments Central SoMa Plan DEIR - 2011.1356E

I have forwarded comments submitted 2/12/17 by James Whitaker to the Federal Transit Administration, Region 9 on **the DEIS/DEIR for the Transbay Transit Center Program**. Since the area for Transit Center work overlaps with the area of the Central SoMa Plan DEIR, I have mailed it separately with my additional comments.

The issues raised by Mr. Whitaker should also be addressed in the Central SoMa Plan EIR:

Construction effects of improvements to existing residents, pedestrians, and bicyclists, in particular on air quality, pedestrian and bicyclist hazards during construction of Central SoMa projects and related "improvements."

I-Hestor-1.1
CU-3

Impacts that will spill over into the Central SoMa Plan Area from cut-and-cover construction methods on the soil, the structures, traffic intersections, sidewalks and businesses. I note that the area of most intensive proposed activity and increased height is just north of the CalTrain yard along Townsend St.

I-Hestor-1.2
GC-4

Soil impacts for the SoMa Plan Area is mostly on land created by filling San Francisco Bay. The bay went deep into what is now the South of Market. The high water table there caused land failures and sand boils in Loma Prieta. Fatal injuries occurred. The area of the Millennium tower is similar fill. Because that building was not anchored to bedrock, resulting problems tilted the building. Adjacent soil was dewatered for construction of nearby Transit Center buildings. What will be the impacts of trenching along Brannan cited by Whitaker for the projects anticipated under the Central SoMa Plan. What are impacts on existing buildings north of Brannan? Please include analysis of groundwater table draw down related to tunneling.

I-Hestor-1.3
GE-1

What are the impacts on pedestrians and bicyclists related to the goals of Vision Zero to reduce hazardous walking and biking conditions - both to persons heading to the CalTrain station and to the nearby office and residential areas?

I-Hestor-1.4
TR-9

Are noisy operations to be banned at times existing residents, or new residents coming into the area, i.e. no night time noise.

I-Hestor-1.5
NO-1

Additional Sue Hestor comments

I-Hestor-1.6
PP-5

There have been a series of prior planning and actions south of Market covering the same area of the Central SoMa Plan. The Project Description **"Plan Vision" text in II** omits mentioning AND fails to show them on a map. Please include in *THIS* EIR a description of each of the plans (and one intervening implementation). What was goal of the rezoning or plan? Effective date? MAP of resulting heights and zoning classifications. Each planning process occurred with several years of public involvement. Provide approximate start and end dates of each public planning process. And date of adoption of plan/rezoning. Figure II-1 should be used as model to show area.

Downtown Plan - changed zoning south of Market from industrial and light industrial

Subsequent rezoning of south of Market - staffed by Susana Montana and Paul Lord (several year process fine-tuned South of Market to allow PDR and artist uses in former industrial warehouses, provide space for non profits serving residents and support existing, mostly low-income and family, housing)

Late 90s explosion **of commercial live/work projects**. 5000 total units in industrial areas, over 1000 units in Central SoMa Plan area. Over 5 years of project approvals - bridge between ***Subsequent rezoning*** above and decision to commence ***Eastern Neighborhoods Area Plan.*** NO AFFORDABLE HOUSING BECAUSE LIVE-WORK NOT HOUSING - Commercial use REQUIRED. 1:1 parking. NSRs which limited occupancy and use -required commercial tenancy and annual business registration. No attempt made to build out residential neighborhoods.

Eastern Neighborhoods Plan - Please show boundaries map East SoMa and West SoMa on map.

Western SoMa Plan - Please show boundaries on map.

I-Hestor-1.7
PP-8

Where Central SoMa EIR refers to Eastern Neighborhoods or Western SoMa Plan, please cite to **specific page** of that Area Plan so others can find and review. e.g**. II-3** para 2 of Background refers to pending development of Central Subway related to THIS Central SoMa Area Plan and EIR. Provide reference to **page** in Eastern Neighborhoods Plan. Similar in Western SoMa Plan which occurred after EN had already been adopted.

I-Hestor-1.8
GC-12

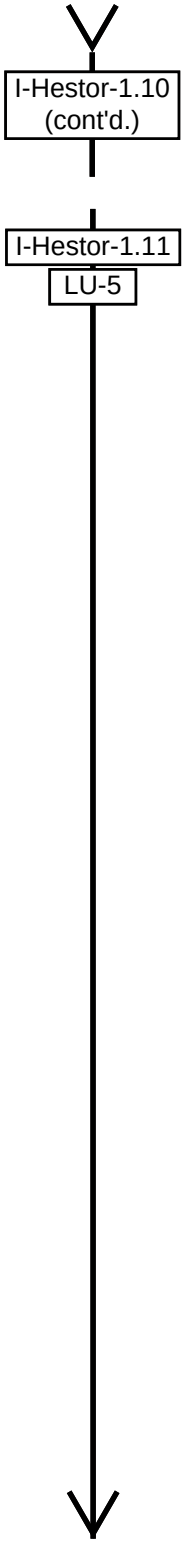
Based on the lengthy multi-year planning processes - particularly the lengthy time spent planning Western SoMa Plan which fine-tuned protections for existing residents AND JOBS - an observer might think that Planning was waiting for the Western SoMa planning process to END. So that it might be ripped to shreds and discarded after members of the public, who worked years on Eastern Neighborhoods then Western SoMa Plans, were burned out and went away. And another high-rise district, on bay fill, could be created to benefit developers of offices and market-rate housing.

I-Hestor-1.9
PP-2

11-4 discusses housing goals in regional plans. Do these goal numbers include San Francisco providing/building housing for reverse commuters from Silicon Valley - Santa Clara and San Mateo county? There has been an explosion of reverse commuters renting or buying San Francisco housing because inadequate housing is being provided on the Peninsula for the expansion of commercial space. Unlike San Francisco - which for over 30 years has required commercial developers to fund housing construction *because the PUBLIC pushed Planning to impose housing and transit fees* - San Mateo and Santa Clara have chosen to let commercial developers off the hook.

I-Hestor-1.10
GC-1

Project Objectives II-5. In light of previous planning efforts, please discuss how successful the various rezonings have been in attaining their stated objectives. Specifically in regard to stabilizing and



expanding residential communities (Youth and Family Zone in EN). Expanding commercial work space for artists in post Downtown Plan south of Market zoning. Expanding transit routes (including on 2-way Folsom PLUS new Muni lines in south of Market). Stabilizing jobs and services in Eastern Neighborhoods and Western SoMa Plans while maintaining housing for wide range of incomes.

South of Market rezoning after Downtown Plan adoption had unexpected result in approval of over 5,000+ units of commercial live/work several years later in late 1990s in areas historically zoned for light industry. The South of Market rezoning had made legal conversion or construction of new live/work. In reaction to community pushback on what was perceived as upper end HOUSING, Planning took aAn important interim step. The Commission/Department developed and imposed NSRs on most live/work units. Nearly all of the units and NSRs were in the **Southeast Quadrant. The quadrant leader should have access to and knowledge of the NSRs and how compliance has been monitored**. Except for a very small area of the South of Market, new ***housing*** required a Conditional Use. Because live/work was a PERMITTED ***commercial*** use it did not require CU approval nor provide any affordable housing.

Over 1000 of the total 5,000 live/work units were built in the Central SoMa Plan Area. Many had NSR conditions which addressed concerns about new residents of commercial spaces coming into an light industrial area where there were existing PDR and other uses which would have some conflicts with new live/work residents. NSRs designed to head off conflicts.

Requested mitigation measure to notify of pre-existing mixed use nature of Central SoMa.

The Department should have in its files the language of the NSRs PLANNING imposed on live/work projects. To expand uses and heights into areas that have uses and occupants that are PDR, industrial, services for low and moderate income people, a mitigation measure to ensure protection of legal pre-existing uses is needed. Given experience with live/work NSRs, the NSRs need to be signed AND RECORDED by each succeeding owner or resident of a new building - at a minimum market rate housing and commercial office. The RECORDED NSR should advise signer that they are moving into an area that had been for decades has been zoned for industrial use. That non-profit agencies had been owners and occupants of Central SoMa for decades so that low income persons and nearby areas could be served. That *THEY*, residents of new market rate housing and occupants of office buildings, are the interlopers. In my words, they should not bitch about others who have already been operating legally in the area as a permitted use. Imposition of a mitigation measure that must be signed AND RECORDED by successive condo owners, and required to be signed by office tenants, would allow mixed uses to continue, along with long term residential tenancies by lower income people.

I specifically refer to the language imposed on the project at 1000 Pennsylvania (AB 4224, Lot 42) which acknowledges the presence of industrial uses in that industrially zoned area with an aim to protect the uses. Language based on the following should be required:

> The property owner and all successors in ownership of (office building, market rate housing, etc) shall disclose in writing, and require a signed AND RECORDED acknowledgment therefor and, for tenants, such disclosure shall be included in the signed lease agreement that:
>
> (A) the project was built on property which was zoned (here need history of zoning back to industrial zoning pre-downtown Plan, and what uses were permitted up to Central SoMa Plan zoning) and that property, when approved for the subject project, was surrounded by a mixture of residential, commercial (including nighttime entertainment) and industrial uses;

(B) that industrial use and the jobs they generate are important to San Francisco;

(c) that the nature of industrial use is often noisy, odorous, and operate at all hours of the day or night, on all days of the year, and often locate in industrial areas;

(D) that activities permitted in an (M-1 Light Industrial Zoning District - modify) generate noise from patrons and other entering and departing the area at all hours;

(E) that surrounding industrial facilities may generate other circumstances and conditions that may be considered by some people as offensive to market rate housing or office use;

(F) that there exist numerous nightclubs and restaurants in the nearby area.

I-Hestor-1.11 (cont'd.)

This mitigation measure requiring a signed RECORDED NSR - which is binding on all subsequent owners or tenants - should be imposed on any market rate housing or office development in Central SoMa.

Project Location - IIC. To understand cumulative development projected in Central SoMa plan area, a list of PPAs in that area with description of proposed height and projected size, including number of parking spaces. Since the area for transportation and related areas includes a broader area - Market to Townsend, 11th St to The Embarcadero - please also provide PPA information PLUS the same information for projects undergoing environmental review or which have been approved since the Central Corridor plan was initiated in early 2011.

I-Hestor-1.12
CU-1

Wind

I-Hestor-1.13
WI-1

What are the dates for the wind speed data collected at old Federal Building at 50 UN Plaza?

I-Hestor-1.14
WI-4

Planning Code 148, Reduction of Ground-Level Wind Currents in C-3 Districts, was adopted in 1985 as part of the Downtown Plan. Development under Downtown Plan mostly focused development in the eastern part of the C-3 district, specifically C-3-O, C-3-O(SD), C-3-R. Little attention was paid to the C-3-S and C-3-G and wind complications there because no significant high-rise housing or office use was projected. Subsequent to the Downtown Plan a separate more relevant wind study was done focused on westerly winds coming into the western part of the Central SoMa Plan area. The information from that study is more relevant than Planning Code 148 to understanding, avoiding and mitigating winds in this area of South of Market.

That wind study was done for the Redevelopment Agency by Environmental Review. The Agency was in midst of DONATING the site at southeast 10th & Market to the federal GSA to construct a new federal office building. Because of concerns over wind conditions, raised by residents of the Tenderloin, there was serious analysis of winds coming over the Hayes Street hill. How winds accelerated and created dangerous conditions as they approached and crossed Van Ness, hit buildings and swarmed onto both Market and areas south of Market.

I-Hestor-1.15
WI-7

IV.G shows that the later study has resulted in further analyses of the impacts of development in Central SoMa. The effect of the differing street grid pattern north and south of Market is discussed. But other

factors not analyzed in this EIR must also be discussed. The effect on BICYCLISTS is important but not discussed. It is different from effects on people seated or walking - both of which have standards in the EIR. There is substantial bicycle traffic TO and FROM the CalTrain station at 4th & Townsend. The Central SoMa is area with and proposed for substantial new construction. Both under Central SoMa Plan and associated with CalTrain itself. All require analysis in regard to compounded wind hazards in a construction zone. I have seen bicyclists blown over by gusts of wind. Active bikers have told me of their own experience biking west on Mission and Market. Winds accelerate when the fog rolls east in the afternoon. The danger to bicyclists must be discussed. Concerns were raised in that regard by Jason Henderson in comments on the One Oak EIR. Please consider his comments as raising issues for THIS EIR.

I-Hestor-1.15 (cont'd.)

The other missing discussion of wind impacts is on vehicles on the elevated I-80 freeway running between Harrison and Bryant Streets. Impacts on seated persons and pedestrians are measured at different heights. As high-rise buildings are built adjacent to and higher than I-80 freeway, what will be wind effects on vehicles on the freeway? Explain whether **Figure IV.G-2** has information on the elevated level of I-80 freeway at sites 11, 13, 14.

I-Hestor-1.16

WI-9

The **wind tunnel tests - IV.G-3** et seq - appear to have been one off analyses of individual projects. Not analysis assuming construction of ALL of the projects. Please review the language and explain what cumulative development was in each analysis.

I-Hestor-1.17

WI-11

Additional Mitigation for Winds

DEIR acknowledges that windiest areas are generally along 4th and 5th Streets south of Bryant - one of two areas proposed for dramatic height increases. Another area with significant height increases is north of the freeway from 2nd to 4th Street.

I-Hestor-1.18

WI-12

The developers of all buildings over 85 feet - particularly market rate housing and office buildings - should have to contribute to a fund that allows the Planning Department to maintain and consistently update a wind study that on-going basis adds all new construction of whatever height in Plan Area.

IV.G-7 et seq. Please explain in clear language how environmental review as to when wind and other project specific impacts will be done for future projects in Central SoMa. The discussion states that study will be done**. IV.G-9 says that subsequent future development could alter winds in a manner that substantially affects public areas. SIGNIFICANT AND UNAVOIDABLE IMPACT.**

I-Hestor-1.19

WI-10

Since this is EIR for Area Plan, does Planning/Environmental Review expect that the "usual" exemption time line will be followed? That so long as the *Exemption is in hand at the time that the Planning Commission acts*, CEQA requirements are being followed?

To ensure thoughtful evaluation of project specific impacts, **I request that an Exemption for a project requiring any wind study be approved by the ERO NO LATER THAN 3 weeks before the Planning Commission hearing + that the availability of the Exemption be part of any notice of hearing + and that any Planning Code amendment implementing the Central SoMa Plan include language that requires Planning Commission hearing and approval for a project requiring a wind analysis.**

Alternatively building heights should be reduced so that heights are kept under 85 feet so that wind speeds do not accelerate.

Scoping out Geology and Soils

The INITIAL STUDY (Appendix B - p.135) improperly scoped out the issue of geology and soils. Please include **map p. 138** which shows that the vast majority of the current Central SoMa Plan area (3rd - 6th Sts) is artificial fill (former SF Bay) and **map p. 143** which shows that same area is a liquefaction zone.

I-Hestor-1.20
GE-1

The soils condition in this part of Central SoMa - Bay fill - is similar to that of the Millennium tower in the Transit Center which building was not anchored to bedrock. See my comments above on first page. Different types of construction are required for different building heights.

Low rise housing - which can be relatively dense low and moderate income housing and family housing - doesn't require foundations driven to bedrock. As heights increase dramatically for office buildings and market rate housing, the type of housing construction will change. Where the soil is filled San Francisco Bay and heights remain modest, even if dense low-rise housing is allowed, construction costs come down.

There needs to be discussion IN THE EIR of what method of construction is mandated by the SOILS and the high water table of the land. The Central SoMa Plan should learn from the sobering experience of the Millennium tower.

Earthquake impacts are more than ruptures on faults. Loma Prieta had serious impacts in this area of the south of Market. Not just on the Marina.

I-Hestor-1.21
GC-8

Developers have bid up the price of land counting on DRAMATIC increases in building heights. The cost of high-rise steel, pile- driven construction will drive up the cost of housing. Modest increases with appropriate frame construction will allow lower income housing to be built. The Central SoMa Plan should not be predicated on maximizing developer profit and costs. The current plan for most of this area is the Western SoMa Plan.

If the fill nature of the soils requires expensive types of construction, limiting those who can afford to build, reducing heights may very well enable less costly construction methods that will reduce the cost of housing construction.

Submitted,

Sue C. Hestor

I-Hong

From: Dennis Hong <dennisj.gov88@yahoo.com>
Sent: Monday, February 13, 2017 4:59 PM
To: Gibson, Lisa (CPC); Jacinto, Michael (CPC); Wertheim, Steve (CPC)
Cc: Lee, Mayor (MYR); Board of Supervisors, (BOS); Secretary, Commissions (CPC); Kim, Jane (BOS); Peskin, Aaron (BOS); Rose, Paul (MTA)
Subject: DEIR - Central SOMA Case 2011.1356A

February 13, 2017
San Francisco Planning Department
Atten: Miss. LisaGibson, Environmental Review Officer
1650 Mission Street, Suite 400 San Francisco , CA. 94103
Subject: Comments Central SoMa Plan- Number: 2011.1356E

Good afternoon Miss. Lisa Gibson,
I am writing in **full support of this project**. I believe this Document / Plan will help guide developers and planners alike thru this area of the City. Mostly to sort have have a Master Plan that shows how all these Area Plans work with each other. My name is Dennis Hong, I have been a resident and a private citizen residing in San Francisco all my life – Sixty years-plus. Thank you for letting me review and comment on this Project and several others in the past. It's always a pleasure reviewing and commenting on the Departments professional EIR's. The Planning Department has been very supportive with my requests and I appreciate all the professional efforts that are made in producing these documents. OK, lets see if this email works. After reviewing this report (above), here are my following comments which are due today at 5PM and trust I did not miss the deadline to submit my comments and that my email format works. I have concluded there is sufficient information and I fully support this Project/Plan and this report. Each project has it's own values and comments, this one is more unique that a typical DEIR.

I-Hong.1
PM-2

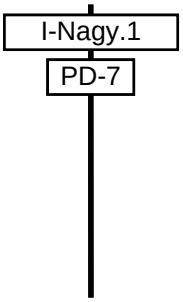
FINALLY: Thanks to you, the Planning Department and the Board of Supervisors for working so hard on these projects. I will continue to review and comment of future projects as needed. Thank you for your consideration of my comments as part of the DEIR. Please include my comments in the final Report.

Should anyone have any questions regarding this email/letter, please do not hesitate to contact me at dennisj.gov88@yahoo.com. Especially if the email format was confusing or was muscled with the cloud.
PS: If there are any compelling reasons why this project should not continue or be delayed, I would be interested to understand why.

Best Regards,
Dennis Hong
101 Marietta Drive
San Francisco, Ca. 94127

I-Nagy

Tamas Nagy

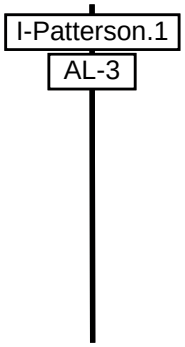


I've read the parts of the Draft EIR related to biking in Central SOMA as I often commute through it. I live in Mission Bay and one of the fastest ways of getting to downtown is via the third street corridor. It's not clear whether the bike lane proposed for the third street corridor is protected or not. I fear it is the latter. The success of protected bike lanes on Fell St and San Jose Avenue (and soon to come to 7th/8th) show that is the only way forward for bike lanes in heavily trafficked areas (like Third street).

I think it is paramount for the safety of bicyclists that the cycletracks installed on Third and Fourth are protected by parking or concrete barriers/planters.

I-Patterson

Richard North Patterson

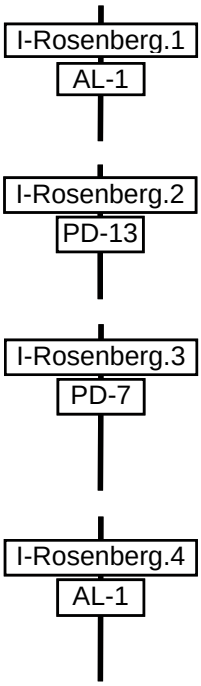


I strongly object to the even higher High – Rise Alternative released in August 2016. It seems that Second Street is being singled out for huge high-rises for no apparent reason. This will affect light and air, not to mention further traffic and congestion. This will make the neighborhood less attractive and accessible.

The point of a rational development plan should be livability and a reasonable mix of housing – especially affordable housing – office space, and businesses, balanced to create a livable environment which includes housing for middle-class San Franciscans. The Mid – Arise Alternative comes far closer to achieving these goals. The city should not deviate from that plan, including along Second Street.

I-Rosenberg

Isaac Rosenberg



Overall, the Central SoMa plan needs to accommodate for far more people than it currently does. A height limit of 120-200 feet in most places simply isn't enough to handle the demand of living in SoMa. I would like to see the height limit increased to at least 300-600 feet in most places.

Also for specific projects, I would like to see Planning let 330 Townsend proceed as all residential, and not have to dedicate space for a mid-block alley, which would remove badly needed housing units. In addition, I would like to see an upzone for the 636-648 4th Street site to 350 feet, to add more housing to the area.

As for biking, I live on 5th street and would like to see a class I dedicated bike lane there. On 4th street, over the bridge, I would like to see it closed to vehicular traffic and turned into a pedestrian/transit only bridge. This would prevent the T line from being congested by cars, and greatly improve the T line reliability and speed. Cars could go to the nearby 3rd street bridge or on 8th street.

Overall, this plan was started in 2011. Since then, San Francisco has added over 200,000 jobs. Yet this plan only zones for an additional 45,000 jobs. This simply isn't enough. We need policies that are in touch with the times that we live in.

We need policies that enable the creation of safe, affordable homes at a meaningful scale.

Isaac.

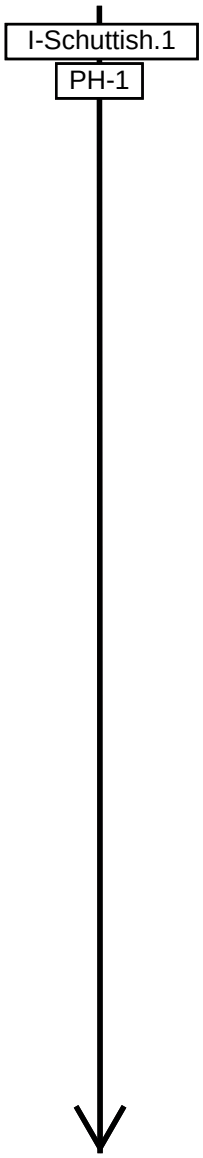
I-Schuttish

On Feb 13, 2017, at 2:43 PM, Thomas Schuttish <schuttishtr@sbcglobal.netwrote:

Dear Ms. Gibson:

Good afternoon. Sorry to get my comments in just before the buzzer, but I hope that is OK as it is now 2:40 in the afternoon here on my computer. Thank you and hope you have a Happy Valentine's Day.

Here are my comments below:



On page S-55 of the plan it states that the range of number of households projected with the various alternatives is approximately 9,200 households (no project) to 25,500 households (plan implementation). This is by the year 2040.

On page IV-6, Table IV-1 Summary of Growth Projections" seems to show these same numbers just broken out differently, for households under the both options for the plan, No Project and Central SOMA Plan. There is footnote ("footnote a") in there which assumes an 87% occupancy rate because there are a lot of newly constructed units, but then assumes a jump to 95% occupancy in the Plan Area in the remaining years of the plan.

These percentage numbers in "footnote a" are based on the 2010 Census. According to the footnote this was when a lot of these even newer buildings in the Central Soma were not even under construction in part due to the ongoing economic downturn from 2008. In other words, there were some new buildings in 2010, that were not occupied, but "newly constructed". But there were probably even more in the years after this time and up until 2012-2014 when the economy pick up again.

Also with regard to this footnote: Aren't these households counted in the 2010 Census occupying buildings that most likely have long term occupancy which would mean rent control, long term mortgages, subsidized housing? Is it reasonable to assume as this footnote seems to imply that the high rate of occupancy is due to all the newly constructed units?

Also is the assumption of occupancy rate possibly too high, because those households that are attached to units that are condominiums do not necessarily need to live there in order to purchase the unit, or live there full time (pied-a-terre, airBnB, safe harbor investment, etc).

My point is that isn't this occupancy rate possibly too high an assumption because they are not really occupied and the high occupancy is a different number, perhaps a lower number based on earlier or pre-2010 housing or units?

In other words, just because the buildings are built, whether they were specifically the buildings cited in the footnote or buildings that came on the market by the middle of the decade, can the level of occupancy be safely assumed? Or to put it a different way…are a number of these buildings "Zombie Buildings" because the households are not really in these buildings? Is the only real occupancy of households, pre-existing housing prior to 2010 and even earlier housing stock?

As a sidebar, how do these occupancy rates from 2010 compare to the occupancy rates for households in the eastern SOMA?

I-Schuttish.1
(cont'd.)

And even if the occupancy rates are accurate, regardless of the points above, there is another question relating to occupancy of households. That for various reasons, some of which are above, will these projected households find their supply of proposed housing within the Central SOMA Plan Area?

My concern is that this big jump in households will instead demand housing in the neighborhoods to immediately to the west and to the south of Central SOMA and seek the supply there.

If people are working in Central SOMA but seek and occupy housing and create households in these other neighborhoods to the west and south…there are two potential impacts….further gentrification which apparently cannot be directly dealt with under CEQA, but issues of transportation, air quality, etc…all of which are important.

Why would households seek to occupy housing in the other neighborhoods to the west and south and not just the Central SOMA? Because it may be more desirable housing due to type of density of the neighborhoods or because of issues of affordability. Perhaps it will be perceived as more family friendly housing or one member of the household will work in the Central SOMA Area, or in the other parts of the expanded Financial District, including the Eastern SOMA while the other member works down the Peninsula. This may be a realistic decision of these types of households due to either higher income levels or size of the household. Higher income levels can buy whatever they want, wherever they want…including neighborhoods to the west and south that may be currently relatively affordable….namely: Outer Mission, Excelsior, Portola, Crocker Amazon, Bayview, (and even parts of the Mission, Noe, Glen Park and Bernal Heights).

I understand that households with enough economic means can occupy housing anywhere and focusing on these particular neighborhoods may be tunnel vision….if these households don't occupy in the Central SOMA Plan Area they can go anywhere they want.

However as these residential neighborhoods cited above are basically adjacent to the Central SOMA (not separated by Market Street), I think it is reasonable to assume that they would inspire the most demand. Particularly in the context of family friendly housing, relative affordability, amenities, transit and transportation, etc.

Please clarify the impacts on these particular neighborhoods to the west and south and what the numbers in under the No Project and the Central SOMA plan portend, (as well as the various other alternatives mentioned in the DEIR if possible).

These are my comments.

Thank you very much for your time and that of your Staff and all the hard work that goes into producing such a document.

Sincerely,
Georgia Schuttish
460 Duncan Street
SF 94131

I-Schwark

On Feb 13, 2017, at 3:27 PM, Jon Schwark <jscgm@yahoo.com> wrote:

Planning Department Staff, Members of the Planning Commission, and BOS

I-Schwark-1.1

AL-1

I'm writing today to express my extreme disappointment in the Central SoMa Plan and it's EIR. I live at 6th and Market near the edge of the plan area, and also write as a member of the SF Bay Area Renters Federation and SF YIMBY Party.

The most critical paragraph in the Central SoMa plan for understanding why it must be sent back to the drawing board for a thorough reconsideration is this:

"Under existing city rules, there is potential to build space for approximately 10,000 jobs and 2,500 housing unit. With the adoption of the Central SoMa Plan, there would be potential to build space for approximately to 45,000 jobs and 7,500 housing units. The plan therefore represents an increase in development capacity of 450% for jobs and 300% for housing" – Central SoMa Plan

I don't call for a thorough reconsideration lightly. Last year we witnessed a coordinated PR campaign by so-called housing "advocates" in the city to dub the AHBP a "displacement bomb". AHBP solely sought to create more housing units (perhaps around 15,000) without greatly increasing jobs. Despite the negative propaganda attack, in truth it would have eased displacement overall. On the other hand, looking at the numbers for Central SoMa, we can see the true displacement bomb is actually right now above our heads.

It is an abdication of your civic duty to ignore this.

In the absence of a *surplus* of developable housing over developable and planned office space/jobs in other parts of the city, and generously allowing for 2 workers per unit, Central Soma will result in the additional displacement pressure of 30,000 people. I am confident that under close inspection, you will find no such surplus of developable housing exists in the other area plans and neighborhoods of the city. If someone tells you such a surplus exists, ask to see the *citywide* numbers for both housing *and jobs*. Central Soma is short about 14,000 housing units (total 22,500), just to make it do no harm.

I believe we should specifically ask the planning department for:

1. An EIR option that is Jobs-housing balanced at the same level of office space creation as currently in the plan, and
2. An option that allows for 2x as many people housed as employed.

It is a failure of our process that in our current housing shortage Planning thought it was politically acceptable present only plans that made our housing crisis *worse* or *much much worse*.

I-Schwark-1.1
(cont'd.)

I don't think we should micromanage the planning department by telling them *how* to arrive at plan that doesn't displace 30,000 people, and I would like to stress that I do believe we need the commercial space zoned in the plan, and would prefer we allow developers to convert airspace into housing.

That said, If we can't resolve the jobs/housing balance issue with just adding more housing, and we were to push some office development to other areas in order to create more housing, that is also better than the current plan. For instance, if we pushed office development to Oakland, the EIR doesn't really look at potential lower VMT numbers and transit efficiencies due to workers from the East Bay not needing to take the bridge or tunnel into the City. Less office in Central Soma would also or create a better development environment for office projects in Mission Rock and Eastern Neighborhoods areas that are depending on commercial space to fund affordable housing creation, parks etc.

The city controller has estimated that all else being equal, an increase in 1% in the housing stock of the city will translate to about 1% decrease in housing prices. Applying this principle, the current plan's shortage of 15k units represents about a 4% rent hike for everyone. Imagine if we matched and then doubled the housing need created in the plan, building 45,000 housing units in Central SoMa. The increased housing capacity would create an 8% decrease in housing prices instead.

We are not obliged to approve an area plan EIR in the same way we are an individual project EIR just because it touches on and mitigates all relevant EIR criteria. If the up-zoning is passed however, projects must be approved if they meet the zoning and other policies, regardless of their impacts on the housing crisis. This is our last best chance to fix the displacement and social issues caused by new development in the plan area.

Thanks for your consideration,

Jon Schwark
1005 Market Street #406
San Francisco, CA 94103

I-Su

From: Justin Su [mailto:justincsu@goalbookapp.com]
Sent: Monday, February 13, 2017 10:17 AM
To: Gibson, Lisa (CPC)
Subject: Central SoMa Plan - EIR Comment

Hi Lisa,

I-Su.1
AL-1

I'm a Central Soma resident living at 673 Brannan. I'm part of a newly formed District 6 Coalition for Housing, a group of D6 residents who are pro-housing - our main comment on the EIR is that we would like to see an **Increased Housing Alternative**. The ratio of 7,500 housing units and 50,000 jobs is a poor housing to jobs ratio - even with the 33% affordable requirement (which is great), this housing to jobs ratio will only continue to push out the lower class, middle class, students, and elderly across the city, especially in the areas in or close to Central Soma.

We realize this plan was formulated several years ago - the Bay Area housing crisis is even more acute now and receiving national media attention. Together we must put in greater efforts to provide opportunity to everyone who wishes to live in San Francisco. We would not like to see the # of jobs reduced - we also do not want an entirely new plan or new EIR process to start - we simply want an alternative for more housing (e.g. 20,000 housing units?) to be presented in the plan and EIR.

Best,
Justin

--
Justin Su
(650) 207-9388
justincsu@goalbookapp.com

I-Weel

From: Jaap Weel <jaapweel@gmail.com>
Sent: Monday, February 13, 2017 4:58 PM
To: Gibson, Lisa (CPC)
Subject: Central SOMA Plan Draft EIR comment

Dear Ms Gibson!

I-Weel.1

AL-1

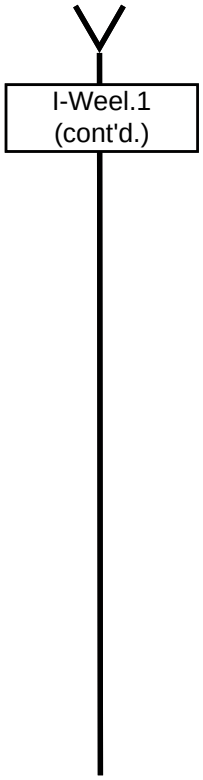
I read much of the EIR, and I generally like what's going on, though as you probably guessed, I wouldn't have bothered writing a comment if there weren't a "but". Just as background here, my concern here is with the housing shortage. Lots of people want to live in the Bay Area, either because they're from around here, or because it's an economically successful and well diversified region with lots of interesting and lucrative jobs, or because of the region's cultural dynamism, or the comparatively inclusive attitude toward those whose ethnicity, sexual orientation, &c are considered too eccentric elsewhere. But amid all that acceptance and tolerance, there's one thing we don't do, and that's actually build housing for all the people that want to live here, and I think that's a shame. The plan would add a lot of potential housing, and that's good.

The draft EIR has nearly 1000 pages of documentation on how all of this upzoning is not some sort of environmental disaster in the myriad ways that California considers things to be potential environmental disasters, including such apparent catastrophes as shadows on existing condos. You convinced me. It's not an environmental disaster.

In fact, quite the opposite. Dense mixed use neighborhoods have much less environmental impact than people commuting in from Tracy or Stockton or Gilroy, which is realistically what you get only even more of when you change nothing. And that's where I'm ambivalent about the EIR as an EIR.

What bugs me about the report is the alternatives analysis. Sure, the document demonstrates that the higher density alternative is not appreciably worse than building nothing, or than building less. But how does it compare to building more? Especially given the switch from Level of Service to Vehicle Miles Traveled, it seems that isn't necessarily a foregone conclusion. Shouldn't we be considering the possibility that a higher density alternative has LESS environmental impact?

After all, with less housing in SOMA, we have more people driving cars in from elsewhere. If for a minute we set away the details of point-by-point impact review, I think that allowing more urban housing has less environmental impact. Not just less than some other plan for regulatory change, but also less than the zero-build alternative. Because zero-build doesn't mean zero-change. Business may have its ups and downs, but the structural economic advantages of prime metro areas like ours aren't going away. The region will continue to attract a lot of people. The default is not that everything stays as it is now. The default is that people move further and further away from the jobs centers until they find a place they can afford. When it comes to professionals like me, zoning restrictions may just be a way to transfer money from our wallets



to that of the landowners, but there many people who work here whose wallets aren't big enough for that. I've spoken to people who commute from as far as Sacramento!

I think there are good arguments to be made that the housing shortage is not just a socioeconomic problem, but also an environmental problem. The alternative to more housing in San Francisco is more sprawl elsewhere. Even if we don't consider the incentive we create for ADDITIONAL sprawl to be pushed for elsewhere, densification can happen regardless, simple because more people pack into a housing unit, and that can definitely happen in Stockton just as well as it can happen in San Francisco. And having lots and lots of people commute in from elsewhere has all sorts of impacts on Vehicle Miles Traveled and climate change.

Or, if you aren't allowed to consider the effects of things that happen elsewhere, since environmental damage that we can help avoid elsewhere is harder to incorporate into this type of analysis than damage caused directly by the changes, then think of it as additional mitigation. The plans have some impact on Vehicle Miles Traveled and on climate change. Having more density means less traffic, and also people living in an urban environment that is generally less impactful to the environment in numerous ways than living in lower density areas. This is not a potential future thing. It's something that's already happening. And adding more housing, including in the blocks that are weirdly set aside for PDR, helps mitigate the environmental impact of the project. Better than any of the alternatives under consideration.

My legal name is Jacob Johannes Weel, but people know me as just Jaap Weel. You can contact me by email. I live in San Francisco, one block away from the project area.

I-Whitaker

From: Jamie Whitaker
To: Jacinto, Michael (CPC)
Cc: John Elberling; Kim, Jane (BOS); Ang, April (BOS)
Subject: Comments on Case No.: 2011.1356E, the Central SoMa Plan"s Draft EIR Report
Date: Sunday, February 12, 2017 9:28:41 PM

Dear Mr. Jacinto,

Please accept the following as my comments on Case No.: 2011.1356E, the Central SoMa Plan's Draft EIR Report.

I-Whitaker.1

AL-1

There is a primary problem with the Draft EIR document in that it throws its hands up and resigns to the notion of what is called "Unavoidable project-level and/or cumulative impacts related to land use, cultural and paleontological resources, transportation and circulation, noise and vibration, air quality, and wind."

There are ways to avoid the impacts related to land use, transportation and circulation, and air quality by tossing out the idea that Central SoMa needs more high-rise office space instead of more housing. We have a housing crisis in San Francisco and an unemployment rate of less than 3% - in other words, the addition of office space only increases the demand for housing by people who will fill these new jobs and who live outside of San Francisco, but sure would like to live in San Francisco.

This is complete nonsense that we cannot avoid more traffic congestion that is very obviously increased when we add office space instead of housing downtown. These impacts are totally avoidable by adding housing - whereby helping to deal with the problem that Planning has already created with so many office buildings, and that is decreasing the demands on oversubscribed regional transportation infrastructure such as BART and the Bay Bridge.

By increasing office space, an avoidable land use choice, we are also killing San Franciscans by shortening their lives via increased air pollution from increased traffic congestion in and around South of Market and nearby areas. This is a cardinal sin to be knowingly increasing traffic volumes in an area that already kills people prematurely due to air pollution from the highways that run through SoMa - and is already acknowledged by our Department of Public Health and the Planning Department via Article 38 in the San Francisco Health Code. While Article 38 helps by requiring post-2008 residential developments to include air filters, we do have such air filtering on older buildings such as my condo building, BayCrest Towers, which were built prior to 2008. Also, we'd like to have some added parks at some point for the hundreds of kids and seniors whose mental health and socialization depends on community public spaces. If the Central SoMa Plan is utilized to focus on housing instead of office, you can rest easy that the City is not

knowingly shortening its citizens lives through increasing traffic congestion and related air pollution/particulate matter. The air pollution increases from adding office are totally avoidable by adding housing instead. Please don't shorten my life - and don't open the City to a class action lawsuit by residents of SoMa affected negatively by this plainly avoidable environmental impact on our public health.

I-Whitaker.1 (cont'd.)

The Draft EIR is inadequate to not clearly name avoidable noise and vibration issues in the evenings and nighttime. The document needs to be improved to state that the most noisy of machinery cannot be used in the evenings or at night where they would disturb the families living nearby projects - again, this is how we AVOID these environmental impacts instead of pretending they are so-called "unavoidable."

I-Whitaker.2

NO-1

With a sinking Millennium Tower at 301 Mission Street and what we already know is a problem with properties sinking in parts of Central SoMa, the report needs to provide mitigations and deeper study of how the foundations of existing buildings will not end up settling more due to soil and dewatering practices - and include a means for monitoring from the start so we don't have another fiasco of finger pointing between the Department of Building Inspection, developers, and potentially other stakeholders.

I-Whitaker.3

GE-1

Please do not punt and say these environmental impacts which include shorting the live of San Franciscans in SoMa. That is an alternative fact, so-to-speak, because they can be avoided to a high degree with greater requirements for mitigations and a refocused Central SoMa Plan to build housing - not more unnecessary office space for a population already fully employed (less than 3% unemployment rate!).

I-Whitaker.4

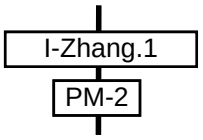
AL-1

Thank you for your consideration,
James Whitaker
201 Harrison St Apt 229
San Francisco, CA 94105-2049

I-Zhang

Jingzhou Zhang

I support the Central Soma Plan in its current form and hope to see them materialize. A shortage of housing is hurting San Francisco.



ATTACHMENT B DRAFT EIR HEARING TRANSCRIPT

TABLE B-1 PUBLIC HEARING COMMENTS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-CPC-Johnson	Christine Johnson, Commissioner	Hearing Transcript	1	PS-1: Childcare
			2	GC-7: Legislative Processes
A-CPC-Melgar	Myrna Melgar, Commissioner	Hearing Transcript	1	OC-1: Gentrification and Displacement
			2	PS-1: Childcare
A-CPC-Moore	Kathrin Moore, Commissioner	Hearing Transcript	1	GC-10: Pace of Change
			2	PS-1: Childcare
			3	AL-3: Support for Alternatives Identified in the Draft EIR
			4	GC-10: Pace of Change
			5	GC-10: Pace of Change
A-CPC-Richards	Dennis Richards, Vice President	Hearing Transcript	1	PM-3: Jobs-Housing Balance in the Plan Area
			2	OC-1: Gentrification and Displacement
			3	PH-1: Residential Location of Plan Area Employees and Occupancy Rates
			4	OC-1: Gentrification and Displacement
			5	PS-1: Childcare
			6	TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles
			7	GC-10: Pace of Change
			8	PH-1: Residential Location of Plan Area Employees and Occupancy Rates

TABLE B-1 PUBLIC HEARING COMMENTS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Organizations				
O-CSN-2	Richard Drury, Attorney	Hearing Transcript	1	AL-3: Support for Alternatives Identified in the Draft EIR
			2	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study Is Inadequate
			3	AL-3: Support for Alternatives Identified in the Draft EIR
O-SFHAC	Corey Smith, Community Organizer	Hearing Transcript	1	GC-3: CEQA Process
O-SFRG-2	John Elberling, Member	Hearing Transcript	1	PS-2: Public Services Analysis Is Inadequate
			2	AL-3: Support for Alternatives Identified in the Draft EIR
			3	PS-1: Childcare
O-SOMCAN-Rogge	Andrew Rogge	Hearing Transcript	1	OC-1: Gentrification and Displacement
			2	CP-5: SoMa Pilipinas Cultural Heritage District
O-UNITE Here	Cynthia Gómez, Research Analyst	Hearing Transcript	1	OC-1: Gentrification and Displacement
			2	OC-2: Growth from New Development
			3	OC-1: Gentrification and Displacement
			4	OC-1: Gentrification and Displacement
			5	TR-2: Methodology
O-YBNC-Light-2	Alice Light, TODCO, Director of Community Planning	Hearing Transcript	1	TR-6: Transportation Impact Figures

TABLE B-1 PUBLIC HEARING COMMENTS

Commenter Code	Name and Title of Commenter	Format	Com. No.	Topic Code
Individuals				
I-Ferro, M.	Mike Ferro	Hearing Transcript	1	AL-1: Analyze Additional Alternatives in the EIR
I-Hestor-2	Sue C. Hestor, Attorney	Hearing Transcript	1	PP-3: East SoMa Area Plan at Risk
			2	TR-2: Methodology
			3	TR-7: Transportation Network Companies (TNCs) and Delivery Vehicles
			4	GE-1: Construction on Bay Fill
			5	TR-8: Transit Impacts
			6	GC-14: South of Market (SoMa) Distances
			7	LU-5: Add a Mitigation Measure to Require Notice of Special Restriction (NSR) for Market-Rate/Office Development to Protect Production, Distribution, and Repair (PDR) and Entertainment Uses
I-Margarita	Margarita (no last name given)	Hearing Transcript	1	GC-2: CEQA Baseline
			2	PD-6: Initial Study Describes a Different Project Than the Draft EIR and the Initial Study Is Inadequate
			3	AL-3: Support for Alternatives Identified in the Draft EIR
I-Meader	Arthur Meader	Hearing Transcript	1	AL-3: Support for Alternatives Identified in the Draft EIR
			2	TR-6: Transportation Impact Figures
I-Renee	Denise Renee	Hearing Transcript	1	TR-14: Miscellaneous Transportation Comments
I-Schwark-2	Jon Schwark	Hearing Transcript	1	AL-1: Analyze Additional Alternatives in the EIR

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BEFORE THE

SAN FRANCISCO PLANNING COMMISSION

CENTRAL SOMA PLAN

PUBLIC HEARING ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

Thursday, January 26, 2017

San Francisco City Hall

One Dr. Carlton B. Goodlett Place

Commission Chambers, Room 400

San Francisco, California

Item No: 10

Case No.: 2011.1356E

Reported By: Deborah Fuqua, CSR #12948

APPEARANCES:

San Francisco Planning Commission:

President Rich Hillis

Vice President Dennis Richards

Commissioner Joel Koppel

Commissioner Christine Johnson

Commissioner Myrna Melgar

Commissioner Katrin Moore

Commissioner Rodney Fong

Commission Secretary Jonas Ionin

Planning Staff Director John Rahaim

Planning Staff:

Lisa Gibson, Acting Director of Environmental Planning

Michael Jacinto, Environmental Planner

PUBLIC COMMENT

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MIKE FERRO..... 15

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ALICE LIGHT..... 21

DENISE RENEE..... 23

CORY SMITH..... 25

JON SCHWARK..... 26

SUE HESTOR..... 27

ANDREW ROGGE..... 30

---o0o---

Thursday, January 26, 2017 12:00 p.m.

--o0o--

P R O C E E D I N G S

SECRETARY IONAS: That will place us under your regular calendar, Commissioners, for Item 10, Case No. 2011.1356E, the Central Soma Plan Draft Environmental Impact Report. Please note that written comments on the Draft Environmental Impact Report will be accepted at the Planning Department until 5:00 p.m. on February 13th, 2017?

MICHAEL JACINTO: Good afternoon, President Hillis and Planning Commissioners. I'm Michael Jacinto, Planning Staff.

The purpose of today's hearing is to take public comment on the adequacy, accuracy, and completeness of Draft Environmental Impact Report prepared for the Central South of Market Area Plan, also referred to as the Central Soma Plan. No Commission approval action is requested at this time.

The Central Soma Plan Area encompasses approximately 230 acres and 17 city blocks in the Central South of Market Area that extends from Townsend Street in the south to an irregular border along Folsom, Howard, and Stevenson Streets to the north, from Second Street on the east, to Sixth Street on the

West.

The Plan's primary objectives are to encourage and accommodate housing and employment growth in proximity to the new Central Subway line that, when complete, will provide rapid rail service between the Cal Train Station, Union Square, and Chinatown.

As described in the Draft EIR, the Plan proposes to meet its objectives by amending land use districts and planning controls in portion of the Plan Area where such uses proposed by the Plan may be restricted or not permitted, by amending existing height and bulk districts to permit greater heights and densities than that which are currently allowed, and by modifying street and circulation patterns within and adjacent to Plan Area, and by establishing new and improved open spaces.

The Plan also includes comprehensive policies and controls relating to land use, urban form, preservation, open space, and sustainability.

This EIR also reviews proposed changes to the area's street network that may affect the function and design of Folsom, Howard, Harrison, Bryant, Brannan, Third, and Fourth Streets within and beyond the Plan Area boundaries.

Commissioners, in April 2013, the Planning

Department issued a Notice of Preparation of the Environmental Impact Report and followed in May of 2013 by holding a public scoping meeting to take comments to help define the scope of the Environmental Impact Report.

In 2013 -- sorry, 2014, the Planning Department prepared and issued a study for the Plan which focused further on the scope of the Environmental Impact Report that we are here to take comment on today.

The analysis of the Plan impacts in this EIR focuses on the environmental topics of land use, aesthetics, cultural resources, transportation, and circulation, air quality, wind, shadow, and hydrology.

The Draft EIR finds significant impacts that may not be fully mitigated in all of those topical areas except for shadow, aesthetics, and hydrology.

In addition to the proposed Plan and its implementing elements, the Draft EIR studies five alternatives to the Plan that generally meet the Plan's basic objectives but reduce, avoid, or eliminate the Plan's significant environment impacts. These alternatives include a no-project alternative as well as a reduced height alternative; a modified alternative developed by the Tenants and Owners Development

Corporation, otherwise known as TODCO; as well as the land use variant; and the land-use-only alternative that does not include the proposed street network changes that are analyzed at as part of the Plan.

Commissioners, the Planning Department published this Draft EIR on December 14th, 2016. It has a 61-day public review period that ends on February 13th, 2017.

Last Wednesday, January 18th, 2017, the Historic Preservation Commission held a public hearing on the Draft EIR. In general, the HPC finds the document adequate and complete related to the analysis of the historic preservation impacts and mitigation measures.

For members of the public who are interested in commenting on the Draft EIR in writing, comment letters should be addressed to the environmental review officer and sent to 1650 Mission Street, Suite 400 San Francisco by 5:00 p.m. on February 13th.

For members of the public who intend to comment at this hearing today, please state your name and address for the record. And please direct your comments to the adequacy and completeness of this EIR.

All comments will be transcribed and responded to in a comments and responses document. When this

work is complete, the Planning Department will provide copies to those who have made comments on the Draft EIR. Public comments on the Draft EIR may also be submitted via a link on the Planning Department's website at sfplanning.org/central-some-plan.

When the Department has responded to all of the comments on the Draft EIR, we will then request that the Commission consider certifying the EIR as complete.

This concludes my presentation Commissioners. If you have any questions, I'll be available.

PRESIDENT HILLIS: Thank you, Mr. Jacinto.

So we'll open this item up for public comment on the Central Soma Plan Draft EIR. I've got two speakers cards, Richard Drury and Arthur Meader. And if there are additional folks who want to comment, you can line up on the screen side of the room.

Mr. Drury?

RICHARD DRURY: Good afternoon, Honorable Members of the Planning Commission. I'm Richard Drury of the law firm Lozeau Drury. I'm a resident of West Portal and I'm representing a group called the Central Soma Neighbors and SF Blue, which represent dozens of people who live in the Central Soma neighborhood, which is a residential mixed-use community of over 10,000

people. These residents are long-time residents.

We urge the Planning Commission to reconsider this EIR to favor the mid-rise alternative rather than the high-rise alternative. And I want to emphasize, our -- the Central Soma Neighbors are not opposed to development. The mid-rise alternative would allow approximately 90 percent of the job growth and housing growth as the high-rise alternative but maintain a livable, family-friendly community on a pedestrian scale with access to light and air and open space, all the things which make this neighborhood attractive today.

O-CSN-2.1

AL-3

And I want to emphasize that this Draft EIR is a radical departure from a document issued by the Planning Department in 2013.

In 2013, the Planning Department issued the Central Corridor Plan, which strongly favored the mid-rise alternative and said that the mid-rise character of the neighborhood should be retained.

O-CSN-2.2

PD-6

For some reason, in three short years, the Department is now favoring the high-rise alternative. And we think it's inappropriate and will -- for a marginal increase in jobs and housing, will deprive the neighborhood of the livability and the human scale that is essential to a mixed-use neighborhood. We don't

O-CSN-2.2 (cont'd.)

want to see a second Financial District South of Market.

Now, I want to emphasize, the mid-rise alternative still allows some tall buildings, but they're clustered at the north and the south end of the development area, around the BART station and the Cal Trans Station. This both allows high-rise development where it's appropriate for offices, but also it encourages the use of public transportation rather than putting high rises on Harrison Street, which is not readily accessible to major public transit routes.

We think that it's important for this neighborhood to retain a family-friendly character as Supervisor Yee is now promoting. And this area, although it is one of the most ethnically and economically diverse in the City, it has one of the highest indices of ethnic diversity, it has slightly higher incomes than the average for the City but also about twice the level of poverty.

O-CSN-2.3

AL-3

It faces challenges like high crime rates, the least open space in the City, pedestrian safety issues, and about twice the level of air pollution as the average for the City and about twice the level of asthma. The mid-rise alternative addresses all these issues far better than the high-rise alternative. And

O-CSN-2.3 (cont'd.)

we urge the Planning Commission to direct staff to emphasize the mid-rise alternative rather than high-rise development in this area. Thank you.

PRESIDENT HILLIS: Thank you.

Next speaker.

ARTHUR MEADER: Good afternoon, Commissioners. My name is Arthur Meader. I am a residence of Soma. I live at 461 Second Street down at Second and Bryant, basically ground zero for people getting on the Bay Bridge. It's on the eastern edge of the proposed district.

I'm in favor of the no-project alternative, I have to say. And I gather today written comments are probably going to be a lot better than just yammering here for a few minutes.

I-Meader.1

AL-3

My overall thing is I think that there's going to be plenty of growth in San Francisco, even under the no-project alternative plan there's going to be growth, and I think about maybe 50 percent of what's thought of under plan.

High rises down there are simply inappropriate. It's the Manhattanization of Soma, which has always been a low-rise, medium-rise area in the past, and I think should continue that way.

Just judging from the traffic that gets on the

Bay Bridge every day, I get a horn concerto outside my window, starting usually about 1:00 o'clock in the afternoon, lasting for hours. If that's translated into the rest of the Soma area, I think it's going to be a total disaster, frankly. So my preferred thing would be the no-project alternative.

I-Meader.1 (cont'd.)

The no-project alternative avoids, what, seven of the significant and unavoidable plan and/or cumulative impacts regarding traffic noise and other things. There will be growth. I just don't think it needs to be these high rises that go up for hundreds and hundreds of feet, especially not at Harrison, like the former gentleman was talking about.

That's also very close, ground zero to getting on the Bay Bridge. These buildings, as suggested, are going to be hundreds of feet tall, including hotels. And it's hard to believe that there's not going to be additional auto traffic, at that location, which is not going to be helpful as far as the bridge goes.

I-Meader.2

TR-6

So I will submit some written comments. I appreciate your time this afternoon. Thank you very much.

PRESIDENT HILLIS: Thank you, Mr. Meader. I'll also call additional speakers, Cindy Gomez and Mike Ferro. Next speaker.

CYNTHIA GOMEZ: Good afternoon, Commissioners. Cynthia Gomez, Research Analyst at UNITE HERE, Local 2, the Hotel Workers Union. We have 13,000 residents in San Francisco and San Mateo County, some of whom do live in the Soma area, in particular, some of the SRO hotels that are concentrated in that area.

We have general concerns about the plan. I'll only touch briefly on concerns about incentivization for displacement of SRO residents who live in the DEIR -- in the Central Plan Area and are urging that further study be done of what the impact of all this up-zoning may be and what incentives will get created.

O-UNITE Here.1

OC-1

But I want to mostly focus on the jobs-housing imbalance that is presented in the Draft Plan as it is and as discussed in the DEIR and a statement in the DEIR that only a portion of employees or residents of a given building will be likely to relocate to the area based on their employment or housing.

O-UNITE Here.2

OC-2

Again, that's from the DEIR. There's no substantiation given for this claim, but it's used to underpin the DEIR's assertion that protection from displacement will be provided for Central Soma residents. And this should not be presented without further data or analysis.

And it also belies San Francisco's recent

O-UNITE Here.2 (cont'd.)

history. We've all seen advertisements for high-rise high-end housing developments that advertise their proximity to Twitter and ZenDesk and other tech companies as an incentive. So we believe it's just not accurate to say that these kinds of developments will not have -- will not cause migration and movement to the area.

We think there should be an analysis and breakdown of the kinds of jobs that are projected to be created by this Plan and specifically by income level and wage. And also of the kinds and types of housing, the price range of these types of housing and, in particular, the kind of family-friendly housing that may be expected to be created, especially in light of recent analysis that there is a terrible shortage of family-friendly housing in San Francisco. In particular, the greenhouse gas analysis, traffic analysis, and public transportation demand analysis should all be redone in the light of this more detailed study.

O-UNITE Here.3

OC-1

And, finally, we also -- as I mentioned, there are concerns about displacement in terms of residents and particularly vulnerable groups. We're also concerned that the structure of this Plan incentivizes creation of a great deal, at least 67 percent, of

O-UNITE Here.4

OC-1

O-UNITE Here.4 (cont'd.)

high-end market-rate housing, many of which ends up as second housing or investment properties, which then, in turn, very often end up advertised as illegal short-term rentals.

O-UNITE Here.5

TR-2

There was no analysis in the DEIR of trip generation or any other impacts that was done for hotels. But it should be redone, assuming that a certain amount of these housing units will end up as illegal short-term rentals.

Thank you for the opportunity to contribute. Good afternoon.

PRESIDENT HILLIS: Thank you, Ms. Gomez.

Next speaker, please.

MIKE FERRO: Good afternoon, President Hillis fellow Board Members.

My name is Mike Ferro. My family is long-time owners of property along Sixth Street between Brannan and Bryant Streets. And we'd like to make some comments in writing regarding the EIR to that Central Soma Plan.

I-Ferro, M.1

AL-1

We feel that there's some additional land use proposals that can be done along Sixth between Fifth -- between Bryant and Brannan, and also along Bryant between Sixth and Fifth. And we'd like to submit those comments in writing to you today for your review.

And that's all I have. Thank you very much for the time.

PRESIDENT FONG: Thank you.

Next speaker, please.

MARGARITA: Good afternoon. As a long time -- my name is Margarita, and I live at 631 Folsom Street.

As a long time resident of Central Soma, I have many issues with the version of the Central Soma Plan released last summer and the Draft EIR released last December.

First and foremost, I want to emphasize that Central Soma is a neighborhood and a community, not a drive-through corridor. And I'm very thankful that the Area Plan was renamed to reflect that.

I-Margarita.1

GC-2

Central Soma is a wonderful and thriving mixed-use neighborhood, with beautiful historic buildings, diverse population, as well as easy access to transit, the Downtown, and the AT&T Park.

Central Soma also faces many challenges. The area has some of the worse air quality in San Francisco. There is a lack of parks and public spaces, and many parts of the area are severely under utilized. The sidewalks are narrow and the pedestrian experience often grim.

The area is intersected by the constant hum of

I-Margarita.1 (cont'd.)

a perpetually packed elevated highway. And the highway on-ramps spill over cars to surrounding streets for many hours of the day, bringing traffic to a standstill. The automobile constantly threatens pedestrians. The loud honking of frustrated drivers is a persistent reminder that the City has failed to take action.

I-Margarita.2

PD-6

As you're well aware, the Central Corridor Plan 2013 included changes to the Area Plan with two proposed alternative heights, a mid-rise option and a high-rise option. In the final Central Soma Plan released last summer, the mid-rise option was erased without an explanation, and a significantly higher high-rise option was proposed.

The proposed higher high-rise option directly catered to existing developer proposals on sites of their choosing, concentrating development in areas far from transit, for example, proposing 350-foot heights right along the highway south of Harrison Street. How does this make any sense?

I-Margarita.3

AL-3

Thankfully, the Draft EIR also explores the impacts of the mid-rise option now renamed "Reduced Height Alternative."

To my dismay, it also dismisses it as an inferior environmental option, even though it meets all

criteria and will develop the neighborhood at the right scale and with less environmental consequences than Central Soma Alternatives. Why is it that the Central Soma Plan has developers' interests in mind? Why is SF Planning not protecting the interests of residents in the area. Why do you want to encourage even more cars by building parking lots right next to the highway?. Why do you want to turn our neighborhood into a dead office park? We don't need another financial district.

We want the area to focus on livability, light, air, and open spaces. We want a safe, dense, urban, walkable, and connected neighborhood that preserves and enhances the wonderful, historic architecture and balances residential, office, and retail uses.

I-Margarita.3 (cont'd.)

Please direct staff to adopt the mid-rise alternative, which is now named the reduced height alternative, as the preferred alternative. The mid-rise alternative will provide almost as much jobs and residential growth, while preserving livability and enhancing the neighborhood we love. Help our neighborhood thrive.

Thank you very much for your time.

PRESIDENT HILLIS: Thank you.

Next speaker, Mr. Elberling.

O-SFRG-2.1

PS-3

JOHN ELBERLING: Good afternoon, Commissioners, John Elberling.

When the Central Soma Plan first got rolling, over five years -- the date on the EIR is 2011 -- we saw immediately that it was basically a Downtown expansion plan. And from that date, we have insisted with the Department and with this Commission that the neighborhood building had equal priority with the economic expansion agenda. And the staff and the Commission have generally supported that.

But "equal" really means equal. It doesn't mean, you know, window dressing. It means making it real. And when we look at what actually comes from the department, it's hard to believe that we are getting that goal with equal priority because, when you look at this EIR and you look at the public services section, which is where all the neighborhood elements that matter for everyday life -- recreation centers, police, fire, childcare, preschool, schools, all those topics -- you don't find it.

There is no public services analysis in this Draft EIR because it was in -- the initial study done several years ago determined that, gee, 5200 new households and 21,000 new jobs don't really add enough demand for new public services.

O-SFRG-2.1 (cont'd.)

Now, perhaps -- I mean, to me that's ludicrous; 5200 new households and 21,000 employees certainly do. But since you must look at cumulative consequences in CEQA -- the adjacent South of Market to the west of Sixth Street, which is also growing dramatically, and of course, the adjacent Rincon Hill Waterfront Transbay neighborhood to the east of Central Soma, which is growing more, enormously. All combined, the whole South of Market clearly will have a very large new demand for public services.

The quality of life issues of residents need more police support, they need more street cleaning.

But the one I really want to focus on -- and the school issue is dramatically important as well. But I really want to focus on the crisis we have right now, which is there is nowhere near enough childcare facilities in the South of Market in the Central City to support the population boom of preschoolers we are witnessing every day. We see it.

And you add 5200 more households in Central Soma, an equal in number in the west, and 10,000 more in the east, and what do you think? Where is the plan? Where is even the analysis?

Now, our Community Plan would require that the eight major development sites, the big commercial sites

O-SFRG-2.2

AL-3

O-SFRG-2.2 (cont'd.)

in Central Soma, all be required to have on-site childcare facilities included in those projects for both their workers and residents. The Department has no plan. The Department EIR doesn't even have an analysis to figure out how much we need -- how many spaces, how many square feet.

O-SFRG-2.3

PS-1

This is clearly not legally adequate. You must add public services section, a comprehensive one, to the EIR.

PRESIDENT HILLIS: Thank you.

Next speaker. And I'll call one additional speaker card, Andrew Rogge.

ALICE LIGHT: Hi Commissioners. Thank you. I'm Alice Light, Director of Community Planning at TODCO. And right now, unless you're a transportation planner, it's extremely difficult to understand what the impacts are from the Folsom and Howard Street changes.

O-YBNC-Light-2.1

TR-6

These changes will have a huge impact on everyone who lives and works in Soma. And for that reason it's really important that the way it's presented it is clear to us what the consequences are of these projects.

Right now, the reader is -- if they want to figure this out, they need to go dig through different

sections of the plan. If you want to see any graphics, you have to go back to the appendix, which is not accessible to everyone. And, basically, you're required to find a lot of scattered information and try to consolidate it yourself and figure out what is happening.

So there really needs -- because of the extent of these changes, there really needs to be a single section that lays them out very clearly and has accompanying graphics that show the impacts.

O-YBNC-Light-2.1 (cont'd.)

So, for example, there should be side-by-side graphics of both alternatives, that show the impact level of service at each intersection. There should be another graphic of the impacts of left -- left turns on each intersection, where there are or aren't left turns, where the turns may increase congestion, where no turns will improve congestion.

And there should also be a graphic, side-by-side graphic for each alternative that show the queuing and lining up for the ramps to get onto the freeway so that, in some cases, streets will see less congestion, and in some cases, they will see more.

But that information will really help us understand what we're looking at and provide, again, a simple way in one place with the graphics will help us

O-YBNC-Light-2.1 (cont'd.)

understand what's going to happen to our neighborhood. Thank you.

PRESIDENT HILLIS: Thank you, Ms. Light.

Next speaker.

DENISE RENEE: Good afternoon, Commissioners. My name is Denise Renee. I'm a city resident. And I have a concern from a different perspective. I do not drive. I take the bus; I take BART; and I walk.

Last -- or mid last year, I got to dance with Dudley Forrest. He's my dance teacher, teaching in this area at Soma.

I want you guys to understand how difficult it is to walk from, let's say, Grace Cathedral down to Powell, take BART get off at Fifth. It is scary, bluntly said. Things I would not want to repeat to you that I cannot unsee. I just want to go to my dance class at 11:00 o'clock and dance with Dudley in this location where you guys are planning all these construction, construction, construction, jack-hammers every day. My nerves are on edge.

I-Renee.1

TR-14

I can't believe what you guys are doing to this city. It's so beautiful to be here. And nobody's listening to each other. Nobody's connecting. It's ridiculous.

I'm a single [sic] happily married woman. I'm

an aunt. I do my best job. I vote; I get to vote. I love voting. I love participating.

I studied urban studies with a professor from California State University Northridge. I graduated before that earthquake. I'm grateful.

But I really want you guys to listen to other people and to stop thinking about just one group and this group and that group. We all live in this most amazing international city in the world. You must respect that.

We must hear everyone that wants to just go to a dance class safely. That's all I ask you guys, to think about that because it's not safe right now. And you need to really understand that. I encourage you guys to really walk the City. Make that part of your plan with all these projects. Just don't take any cars. Take all the public -- well, you can't walk up the hill? Take the cable car up the hill.

I-Renee.1 (cont'd.)

But, please, walk and really examine what's going on. And in this particular project, too. It affects not just the people who live there but the people who want to go there too. Now I don't want to go there, unless my husband goes with me. He has to work.

So thank you for your time. Please listen to

us.

PRESIDENT HILLIS: Thank you.

Next speaker, please.

CORY SMITH: Good afternoon, Commissioners, Cory Smith on behalf of the 300 members of the San Francisco Housing Action Coalition. We're still going through the report with our members, getting a cohesive response to work with staff.

I do have two comments though. We have had the opportunity to really be hands on with this for a long time. We've had multiple tours in Central Soma and really do appreciate the City's working with us and trying to make sure as much of this is open and available to the public as possible.

My other comment is actually related to the Eastern Neighborhoods EIR and the conversation happening there. And please, please, please let us avoid a duplicate situation where five years from now, ten years from now we're going to be looking over everything all over again.

O-SFHAC.1

If we're going to take the time -- we spend a GC-3 lot of time and a lot of money developing a cohesive plan, we need to be able to stick with it because I don't want to end up in this circular cycle where we are continuously coming up and questioning these

O-SFHAC.1 (cont'd.)

things.

If we can get everybody on the same page and get everybody's best interests in mind, I think we are better off. Thank you.

PRESIDENT HILLIS: Thank you.

Next speaker, please.

JON SCHWARK: Hi, Commissioners. My name is John Schwark, and I live on the edge of this neighborhood at Sixth and Market, so what happens here will impact me quite a bit.

Probably the main thrust of my comment today is going to be jobs-housing balance. We've seen this happen in so many plans in San Francisco where we say -- we kick the can down the road and say that, oh, other neighborhoods are going to pick up the slack. The other neighborhoods, the Mission, the Haight, Western Division, they're not wanting to pick up the slack.

I-Schwark-2.1

AL-1

So I think it's kind of responsible for us, when we add a whole new big Area Plan, to think within that Area Plan what is the jobs-housing balance? When you look at Central Soma, it's about six-to-one. So we have created so much incentive to build more office and so much disincentive -- and we all know what we're talking about -- to build more housing.

I'd really like it if we could send this back to the Planning Department and ask them to create more incentives to new housing, including maybe density bonuses, and maybe more disincentives or asks from office developers.

I don't think that necessarily pushing office development to Oakland is a bad thing at this time because, as far as the transportation goes, we have a bottleneck crossing the bay. And more jobs available in Oakland means less people crossing the bay as opposed to here.

I-Schwark-2.1 (cont'd.)

But what we do have is a massive housing shortage compared to the number of people wanting to live in San Francisco because they have jobs here. So I'm not against development. I know all -- everybody always says that. But I'm actually not. Those of you who know me know that I'm almost always in support of the projects.

But let's get it right at the big, wide-scale planning stage, and let's get more incentives to put housing here as opposed to only office.

Thank you.

PRESIDENT HILLIS: Thank you.

Next speaker, please. Ms. Hestor.

SUE HESTOR: Sue Hestor.

I-Hestor-2.1

PP-3

I-Hestor-2.2

TR-2

I-Hestor-2.3

TR-7

I-Hestor-2.4

GE-1

You've had a whole lot of very good comments today. I'm going to go down the topics.

One is I think you're risking the Eastern Neighbors Area Plan exemptions because you've adopted this Eastern Neighborhood's Plan based on the EIR, and you're cutting away and changing the zoning of it. We've already had the 5M; we've had Western Soma. This one I don't think leaves intact the Eastern Neighborhoods Plan in the EIR.

There are massive changes in the traffic patterns since the Eastern Neighborhood Plan was adopted. Reverse-commuting buses from Silicon Valley are dumping the housing demand from Silicon Valley on this area and on the Mission and on the neighborhoods of the city, including Noe Valley.

Uber and Lyft have started and become a disruption of traffic because they stop in the middle of traffic lanes on the north-south street. They don't obey traffic prohibitions. They take illegal turns and make all kinds of weird maneuvers, and they're disrupting traffic, and they're disrupting Muni.

We've also had a shift from retail to trucks delivering packages and meals. And that is massive in the transportation analysis.

This area is mostly all bay fill. It was the

I-Hestor-2.4 (cont'd.)

bay before it was filled. On bay fill, you can't build types of housing without driving up the cost. You are going to have to have soils analysis, and you're going to have to have piles driven into housing [sic]. It drives up the possibility of housing.

I-Hestor-2.5

TR-8

You've had a massive increase -- you're supposed to have a massive increase in Muni lines based on the Eastern Neighborhoods and Western Zone Plan. Those haven't happened.

I-Hestor-2.6

GC-14

The Plan reiterates the thing I've been complaining about for decades. Blocks south of Market are different from blocks north of Market. When they say, "Oh, it's only a two-block area from the Fourth Street rail," it's ridiculous. No one knows them as two blocks if you're used to north of Market blocks or residential blocks. The distance has to be spelled out every time.

I-Hestor-2.7

LU-5

And I want a proposed mitigation for all offices and new market-rate housing, that do not bitch the? condition because this is a former industrial area. There are services for low-income residents, and there are PDR uses.

The Planning Commission imposed a do not bitch condition on the live-work projects so people that move into these new housing units can't complain about the

I-Hestor-2.7 (cont'd.)

people that were there now that are PDRs and residential serving Mission.

That is not a bad word; I understand it.

PRESIDENT HILLIS: Thank you, Ms. Hestor.

Next speaker, please.

ANDREW ROGGE: Good afternoon, Commissioners. I'm Andrew, a long-time resident of Soma and also I represent SOMCAN, which is one of the community organizations that is part of the Soma Filipinas.

Thank you so much for your support of our Filipino Cultural Heritage District. As you know, the Central Soma Plan includes half of Soma Filipinas and some of the most important cultural assets in the Filipino Cultural District, such as the Gran Oriente Filipino Masonic Lodge in South Park, which is a historic site; the Filipino Education Center; the Lapulapu Mural; Bonaficio, Mabini, Tandang Sora, and Rizal Streets; the Mendelsohn House, and San Lorenzo Ruiz Center; and many other buildings and alleyways that are home to the Filipino community.

O-SOMCAM-Rogge.1

OC-1

We are concerned that the Central Soma rezoning will have significant impacts, not only in our neighborhood and streets in the zoning area, but also in the immediate area which comprise the rest of our cultural district in regards to traffic, pedestrian

safety, real estate value, and therefore the affordability of housing and rental space for a community serving non-profits and small businesses.

Many of the long-time Filipino community members who currently reside in the Central Soma are seniors on fixed income and working families who are vulnerable to rising rents eviction.

O-SOMCAM-Rogge.1 (cont'd.)

Like our Manunz [phonetic] and Mananzes [phonetic] I-Hotel, they have felt the pressures from the tech boom and fear that, with the rezoning and building of so many more office buildings, it will mean their eventual displacement.

One of the main goals of Soma Filipinas is preservation and stabilization of the longstanding Filipino community. And we ask you to look at the impact of this rezoning on the vulnerable populations of Central Soma, not just the Filipinos but also all of our longtime friends neighbors in the SROs and apartment buildings.

Lastly, we ask you to look into how our cultural district can be incorporated and reflected in all the new development that is to come from rezoning. All of Central Soma is actually in the Filipino Cultural Heritage District, and so we would like to work with your Commission to help ensure that design

O-SOMCAM-Rogge.2

CP-5

O-SOMCAM-Rogge.2 (cont'd.)

guidelines are developed to integrate the cultural district in future development in the area. Thank you.

PRESIDENT HILLIS: Thank you.

Any additional public comment the Draft EIR for the Central Soma Plan?

(No response)

PRESIDENT HILLIS: Seeing none, we'll open it up to Commissioner comments on the Draft EIR.

Commissioner Johnson.

COMMISSIONER JOHNSON: Thank you very much. This EIR is special for us because it's one of the last remaining neighborhood plans that we'll be seeing for quite some time, if ever. And I'd like to congratulate the staff on a job well done.

I think that there's a lot of comments that I heard today that are reflective of very good questions that deserve response. And I'll be looking forward to the responses.

I have personally have a number of comments related to transit-commute facilities, population, housing, and some of the findings that were in the Draft EIR. But to save time today, I'll provide those in writing. And then, if there are changes that are needed for before the Final EIR, we will have that discussion. And then see where we are when we are

reviewing the Final EIR.

So thank you again to the staff and to everyone who came out today. Really great public comments and a lot to think about today. Thanks.

PRESIDENT HILLIS: Commissioner Richards.

COMMISSIONER RICHARDS: Last week I -- or two weeks ago I said I read the Controller's report on five-year economic growth or the economic report. And the two things that struck me were the limits that the City is hitting are housing and transit. And it's actually limiting the ability of companies to come in here because people can't afford to live here, and it's hard to get around. It's becoming a really difficult ~~plates~~ place to live.

So as I listen to at the comments and I look at the Plan, I, too, like Mr. Schwark, kind of scratch my head and go, we have 63,600 employment growth, and the housing -- I guess dwelling units -- I think it's square footage, but when I read the plan, it was 7,000 dwelling units. That's a huge imbalance.

A-CPC-Richards.1

PM-3

And I'm not sure -- are we exacerbating an already difficult situation? I don't know. And I looked at the -- I started doing some calculations around the project alternatives, and Mr. -- the attorney for the folks in South of Market who spoke

A-CPC-Richards.1 (cont'd.)

first, Drury, he had some compelling things around the percentages of what you're going to be able to achieve with the low-rise alternative, et cetera.

But when you actually do the ratios, the imbalance, it's actually the same across them all. So it's just how much more -- how much -- it's a larger number, but it's the same imbalance.

The woman from Local 2 really had some good comments about what kind of jobs are we going to have because South of Market is one of the lowest and poorest neighborhoods in the City along with the Mission and Chinatown. That was done by the -- I think the Federal Reserve.

A-CPC-Richards.2

OC-1

And here we have these, you know, high-end -- probably high-wage jobs coming in, and we have to have support jobs that are needed.

And I'm worried about displacement as well. We hear this all over the place. And I think here probably especially true, given the increase in population. Probably like -- I think it's real, and I want to really understand what the level of housing that's protected, either under rent stabilization or kind of -- what that looks like here, so we're not dropping a neutron bomb in the neighborhood on housing.

A-CPC-Richards.3

PH-1

Somebody pointed out vacancies. And that's a

A-CPC-Richards.3 (cont'd.)

really good point. So of the 7,000 dwelling units that we have, or whatever the number's going to end up to be, how many people are going to live in them? We have this topic coming over and over. This is on our action item list. And I talked to President Hillis yesterday about it, and we wanted to tease it more, really understand when we say dwelling units, do people actually live there or is it parking money from Moscow or some other place in San Francisco to take advantage of hiding it but also price appreciation.

A-CPC-Richards.4

OC-1

But also the price ranges related -- with the housing, which is already I think in short supply, to the level base wage, something SEIU 2 said.

A-CPC-Richards.5

PS-1

Childcare didn't even register with me until John Elberling got up and we talked about it here last week. And that's a really good point. And the other point -- I think we've been talking about this quite a bit. All the transit and the capacity of the roads, et cetera, for vehicles, do they consider the change that we're really seeing in Uber, Lyft and on-demand delivery services? I think that's important. Took an Uber over; I already ordered my Munchery dinner for when I get home, whenever that's going to be; it will be sitting on my front stoop.

A-CPC-Richards.6

TR-7

A-CPC-Richards.7

GC-10

So is that in your -- I have some questions

A-CPC-Richards.7
(cont'd.)

around that. It's an interesting thing. I mean, the City needs to grow, I agree. But I think we need to balance the growth with the ability to actually have the housing and the transit and all the other support services keep up.

We see what happened over in Potrero Hill. We keep hearing complaints about 16th Street. We don't have a bus line. We have a lot of cars jamming the streets. We talking about doing even more over there. We're in that cycle where we start questioning whether the EIR made any sense because that was ten years ago; so much has changed in ten years. Maybe the 25-year Plan, given the acceleration to level of change, may not make much sense anymore because -- you know.

There's a book I'm reading called "Thank You For Being Late." I suggest that folks read it because it's a really good book, talking about with the acceleration of change and the actual level of change that's happening, it's like unequaled in our history.

So I, like Commissioner Johnson, am going to be sending some comments in in writing as well.

PRESIDENT HILLIS: Thank you.

Commissioner Johnson.

COMMISSIONER JOHNSON: Thank you. Can't help myself.

A-CPC-Johnson.1

PS-1

A-CPC-Johnson.2

GC-7

Just on childcare and related facilities, the reason why I didn't want to go into too much detail and I think it's worth both of us providing some written comment is it's not just about the potential rezoning on the planning. There would be probably a number of Planning Code and Administrative Code changes that would be needed to really get what we need.

So, for example, with childcare, it's not just about requiring that buildings require childcare. We actually need state and local law changes to make it legal to provide those spaces because, as of right now, the way we're set up, buildings actually cannot build those spaces even if you require them to do so.

And I think there are a number of different types of community facilities. And even when you talk about how do we shape our communities to account for new services that are change the face of our cities, like shared housing, shared transit, you know, more delivery services, things like this -- those are all going to require zoning and code changes and building code changes. When everything dropped off by a drone from Amazon, we're going to require changes in our codes to create spaces for that.

So I think it's a deeper discussion than just about what do we want to see. I think there's more

A-CPC-Johnson.2 (cont'd.)

mechanisms than just the zoning and the planning. There are actually law changes that we have to consider. Thanks.

PRESIDENT HILLIS: Thank you.

Commissioner Moore.

COMMISSIONER MOORE: I appreciate everybody's comments. They resonate with me.

And again, Ms. Gibson, these comments are not against you. We are here to shape the document so that it's basically informing the decision makers. That's all it is.

We want it to be comprehensive and shedding light on things which are contradictory for the last three or four years because many of the comments we hear -- and you know it best -- are similar comments that we have heard on individual projects, particularly in the Eastern Neighborhoods. And they are all loud and clear in the room.

A-CPC-Moore.1

GC-10

And the idea of public services, the balance of -- the housing-job balance, all of those are repetitive -- not repetitive but repeated comments that I think they're coming almost to a screeching intersects at this huge project, given that we're not talking about individual buildings but we are talking about the change of a larger quadrant of the city.

A-CPC-Moore.2

PS-1

A-CPC-Moore.3

AL-3

A-CPC-Moore.4

GC-10

The comment that I would like to emphasize is that the public services discussion has an overlay on the family-friendly discussion initiated by Supervisor Yee. And I'd like the discussion of views to be augmented by discussion on urban form, particularly reflecting on the guidelines of the Downtown Plan.

The work we have done prior to 2013 and in preparation for today's EIR indeed spoke about a mid-rise solution. And it is in the smorgasbord that Mr. Wertheim discussed several times in front of us, where people were layering it up and ultimately, I assume the response we're seeing is the high-rise alternative which I believe has push back on many more than one front.

And the Urban Design Plan and the modeling of the alternatives in the larger context of the Urban Design Plan are personally very important for me and require further vetting in this plan.

Just like others, I will submit my comments. And what I'd like to also remind us of is that both in Rincon Hill, the special treatment of the 5M project, project, the special treatment of the Hub all, I think, affect how we look at this project.

And I think we need to find a way to reflect

A-CPC-Moore.4 (cont'd.)

and interweave the discussions on the broader discussion of the transformation of the city at large. Thank you.

PRESIDENT HILLIS: Thank you, Commissioner Moore.

Commissioner Richards.

COMMISSIONER RICHARDS: I just wanted to follow up with this question. And I think I mentioned this to Mr. Wertheim, even though we haven't had a chance to sit down face to face yet. My bad.

If there's a way we can understand in other parts of the city where we added jobs and the amount of housing, but where the people actually live, because I know we had the Greener Report, we had all these different facts come together in my head -- 30 percent of the people don't live in the city, they come in from outside the city, just kind of like a quick accounting, back of envelope, where we expect these residents to live would really be helpful because we know how much housing is being entitled; we can think of how much housing that's going to be built.

A-CPC-Richards.8

PH-1

And then we're based on our -- you know, we're based on the way things actually are on the ground, where these people probably live given the city and the region as a whole. I think it's a very helpful

discussion.

PRESIDENT HILLIS: Commissioner Melgar.

COMMISSIONER MELGAR: Thank you. I don't want to repeat any of the comments that the other fellow Commissioners have made, but I did want to zero in on Ms. Gomez's comments from HERE. There is -- you know, we're adding jobs, and we're also displacing jobs, I think.

You know, I remember seeing a study last year of where folks lived in the Mission who work in the hospitality industry. And I think those are the members of HERE. And there are very similar patterns in Soma, I think.

A-CPC-Melgar.1

Much to my surprise, folks actually still lived in the Mission. And the speculation in the research was that folks actually live close to where they work because they really couldn't afford to commute. Those are the folks who are walking to work and riding their bikes to work who really couldn't afford to pay for BART.

OC-1

So as those housing units disappear, it becomes really difficult to have that workforce here. And, you know, we already know the hospitality industry is suffering from not having the workforce. And I think that cuts across all service-industry-related

A-CPC-Melgar.1 (cont'd.)

jobs.

And so I think that replacing with BMR units is not quite the same population that we're trying to serve. And I'm really cognizant that, if we're planning for densifying the Central Soma, that we have to be really careful about not, you know, causing displacement of folks who live there.

A-CPC-Melgar.2

And also, you know, the issue of childcare and services, I think that, if we don't plan for it, the market will provide. And those services are services that are more expensive than what people can afford who are currently living there. So I will also submit comments in writing.

PS-1

Thank you so much, Lisa, for all your work. It's really great. Thank you.

PRESIDENT HILLIS: Thank you.

Commissioner Moore.

A-CPC-Moore.5

COMMISSIONER MOORE: I'm raising a question that is almost impossible for you to address, Ms. Gibson, and that is the issue that we are living in a time of changing realities, where assumptions change and have significantly changed in the last three or four years. That is a comment by Ms. Hestor, by Mr. Drury and many others. How do we quantify that, and how do we bring it forward in something to inform

GC-10

A-CPC-Moore.5
(cont'd.)

decision makers what to do?

PRESIDENT FONG: So thank you.

Seeing no additional Commissioners' comments, we'll close this public hearing.

Remind the public that comments, written comment, can be submitted to the Planning Department up until 5:00 p.m. on February 13th.

(The proceedings adjourned at 1:50 p.m.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

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

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

Dated the 13th day of February, 2017.



DEBORAH FUQUA

CSR NO. 12948

APPENDICES

C. Historical Resources [Revised]

E. Shadow Modeling Results [Revised]

APPENDIX C

Historical Resources [Revised]

TABLE APX-C-1:
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3707	002	20 Second	1914	Schwabacher Bldg.	N				IV	N-S			3S			C*				
3707	004	36 Second	1907	Morgan Bldg.	N				IV	N-S						C				Wm D. Shea
3707	005	42 Second	1907		N				IV	N-S						C				
3707	006	48 Second	1907	Kentfield & Esser Bldg.	N				IV	N-S						C				A.V. Clark
3707	007	52 Second	1907		N				IV	N-S						C				E.A. Bozio
3707	008	60 Second	1906		N				IV	N-S						C				S. Schnaittacher
3707	009	70 Second	1906		N				IV	N-S						C				Salfield & Kohlberg
3707	010	76 Second	1908		N				IV	N-S						C				Meyers & Ward
3707	011	82-88 Second	1907		N				V	N-S				TC	3CD	C				
3707	012	90 Second	1906		N				IV	N-S						C				
3722	001	118 Second	1907	Stevenson Bldg.	N				IV	N-S						C				E.J. Vogel
3722	002	120 Second	1907		N				IV	N-S						C				Sutton and Weeks
3722	003	132 Second	1907	Morton Cook Bldg.	N				I	N-S		SH	1D			B				John Cotter Pelton
3722	004	144 Second	1908;'82	Bothin Real Estate Bldg.	N				IV	N-S			6X			C				J.A. Ettler
3722	005	156 Second	1908	Byron Jackson Bldg.	N				IV	N-S		SH	1D			C				
3722	016	168 Second	1907		N				IV	N-S		SH	1D			C				Hermann Barth
3722	019	182 Second	1909	Barker, Knickerbocker Bostwick Bldg.	N				IV	N-S		SH	1D			C				
3735	055	240 Second		Marine Firemen's Union	N									TC	3S					
3735	008	282 Second	1907	Planters Hotel	N									TC	3S					
3763	001	400 Second	1917		Y									SoM	3CS					
3775	001	500 Second	1919	Auerbach Bldg.	Y		SE	C						SoM	3D	C				
3775	002	512 Second	1909	Dahlia Loeb Warehouse	Y		SE	C				SE	2D	SoM	3D	C*				Sahlfield & Kolberg
3775	004	522 Second	1923	Macdonald & Kahn Bldg.	Y		SE	C				SE	2D	SoM	3D	C				Samuel Heiman
3775	005	544 Second	1923	Kohler Company Bldg.	Y		SE	C				SE	2D	SoM	3D	C				Samuel Heiman
3775	008	580 Second/ 300 Brannan	1912	Blinn Estate Bldg.	Y		SE	C				SE	2D	SoM	3B	B				C.C. Frye/G.A. Schastey
3788	038	634 Second	1927	The Crane Company Warehouse	Y		SE					SE	2D	SoM	3D	C				Lewis P. Hobart
3788	002	640 Second	1925	U.S. Radiator Bldg.	Y		SE	C				SE	2D	SoM	2D2	C				Herman C. Baumann
3788	054	650 Second	1925	B.F. Goodrich Rubber	Y		SE	C				SE	2D	SoM	2D2	C*				H. C. Baumann
3788	043	670 Second	1918	Moore Investment Co. Bld	Y		SE	C				SE	2D2	SoM	2D2	C*				L. Rosener, engr.
3788	044	678 Second	1913	Moore Ship Bldg.	Y		SE	C				SE	2D	SoM	3D	C*				L. Rosener, engr.

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3788	006	698 Second	1909	SFFD Pump House #1	Y		SE	C				SE	2D	SoM	1S	B*				T.W. Ransom, engr.
3707	052	643-655 Market	1909	Palace Hotel	N				II	N-S	Y		3S	TC	3S, 3CB	A				George Kelham
3707	057	1 Third			N				I	N-S			3S			C				
3706	093	86 Third	1906	Mercantile Bldg.	N					N-S	Y			TC	3S, 3CB					
3722	259	125 Third; 689–93 Mission	1907	Williams Bldg.	N					N-S						B			2D2	Clinton Day
3762	003	428 Third	1917		Y									SoM	3S					
3776	115	500 Third	1927		Y									SoM	3S					
3775	073	501 Third	1920		Y									SoM	5S3	C				
3776	008	566 Third	1907		Y									SoM	3S					
3788	020	601 Third	1920	General Cigar Co. Bldg.	Y		SE	C				SE	2D	SoM	3D	C				-
3787	005	620 Third	1924	Colgate Bldg.	Y									SoM	5D3		SE-A			
3788	045	625 Third		Transcontinental Freight Co	Y		SE	C				SE	2D	SoM	3B	B				George A. Dodge
3787	008	660 Third	1902	South End Terminal Whse	Y		SE	C				SE	2D	SoM	3D	B				William Koenig
3788	041	665 Third	1916	M.J. Brandenstein Bldg.	Y		SE	C				SE	2D	SoM	3D	B				G. Albert Lansburgh
3788	015	679 Third	1906		Y		SE	C						SoM	3D	C*				
3788	014	689 Third	1917	Anna Davidow Bldg.	Y		SE	NC					6X	SoM	3D	D			3D	A. Burgen
3705	004	54 Fourth		Keystone Hotel	N				I							B	~~KM-A~~	C	5B	
3752	008	360 Fourth	1982	Salvation Army Bldg.	Y								2S	SoM	6Z					
3752	010	360 Fourth	1925	Senior Activities Center	Y									SoM	2S	A				Alfred I. Coffey
3762	112	401 Fourth			Y									SoM	5S3					
3777	001	500 Fourth	1908		Y									SoM	3S	B				
3777	002	508 Fourth	1925		Y									SoM	5S3	C				Walter C. Falch
3776	117	525 Fourth	1924		Y									SoM	5S3					
3777	017	534-548 Fourth	1919	Thiebaut Bros. Paper Box Factory	Y								6Z	SoM	3CS	C				
3777	020	564 Fourth	1936		Y									SoM	5S3					
3787	052	601 Fourth			Y									SoM	3S	B				
3786	035	620 Fourth	1907		Y									SoM	5S3					
3704	3	40 Fifth	1907	Oakwood Hotel	N				V							C*	MM	3	3CB	McDougall Brothers
3705	039	55 Fifth	1913	Lankershim Hotel	N												KM-A	C	5D3	John W. Reid, Jr

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3705	021	67 Fifth		Pickwick Hotel Garage	N				I							B	KM-A	C	5B	
3705	023	85 Fifth	1923	Pickwick Hotel	N				I								KM-A	C	5B	
3704	011	88 Fifth	1869–74	The Old Mint	N	236			I		Y		1CL			A				Alfred B. Mullet
3725	097	110 Fifth	1967	San Francisco Chronicle	N														3CS	
3753	008	372 Fifth	1906		Y									SoM	5S3					
3753	009	388 Fifth	1909		Y									SoM	5S3					
3760	012	480 Fifth	1925		Y									SoM	3CS	C*				
3778	001B	530 Fifth	1925		Y									SoM	3CS					
3785	002	650 Fifth	1924		Y									SoM	3CS	C	BTW			
3704	053	35 Sixth	1908		Y									SoM	3D	C*	6th LH			
3704	052	39 Sixth	1906		Y									SoM	3D		6th LH			
3704	051	43 Sixth	1907		Y									SoM	3D		6th LH			
3704	050	47-55 Sixth	1912		Y				V					SoM	3D	B	6th LH			
3704	026	65 Sixth	1913		Y									SoM	3D	C	6th LH			
3725	081	101 Sixth	1915		Y									SoM	3D	C	6th LH			
3725	079	117 Sixth	1911	Rose Hotel/Sunnyside	Y								6Y	SoM	3D	C	6th LH			
3725	064	133 Sixth	1913		Y									SoM	3D	C*	6th LH			
3725	063	139 Sixth	1909		Y									SoM	3D	C	6th LH			
3725	062	151 Sixth	1925		Y									SoM	3D		6th LH			
3725	061	157 Sixth	1907		Y									SoM	3D	C*	6th LH			
3725	026	169 Sixth	1912	Alden Hotel	Y								6Y	SoM	3D	C	6th LH			
3732	124	201 Sixth	1907	Orlando Hotel	Y				I				2S2	SoM	3B	B	6th LH			E.A. Bozio
3732	123	219 Sixth	1908		Y									SoM	3D		6th LH			
3778	002B	149 Morris	1956	San Francisco Flower Mart	Y									SoM	3CD		SFFM			
3778	005	575-599 Sixth	1956		Y									SoM	3CD		SFFM			
3778	016	563-565 Sixth	1956		N									SoM	3CD		SFFM			
3778	018	521-525 Sixth	1910		N									SoM	6D	D				
3778	048	Unknown	1967		Y									SoM	6Z		SFFM			
3786	039	36 Bluxome	1939		Y									SoM	3CS					
3786	019A	53 Bluxome	1917	Hopkins, Timothy, W'hses	Y									SoM	5S2	C				E.A. Garin
3785	002A	410 Townsend	1912		Y								6Y	SoM	5D3	A	BTW			
3785	004	424 Townsend	1936		Y								6Y	SoM	5B	A	BTW			

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3785	004A	135 Bluxome	1923		Y								6Y	SoM	5D3		BTW			
3785	022	149 Bluxome	1916	Moody Estate Co. Building	Y								6L	SoM	5B	C	BTW			
3785	023	460 Townsend	1915		Y								6Y	SoM	5D3		BTW			
3785	024	157 Bluxome	1916	National Biscuit Company	Y								5S2	SoM	5B	C	BTW			J. R. Torrance
3785	132	601 Brannan	1924	The Grinnell Company	Y								6Z	SoM	5D3	A	BTW			
3788	037	301 Brannan	1909	The Crane Company Building	Y		SE					SE	2D	SoM	3D	B*				
3775	101	334 Brannan	1929		Y		SE					SE	2D	SoM	3D					
3775	016	350 Brannan	1929		Y		SE					SE	2D	SoM	3D	C				
3788	024A	355 Brannan	1928		Y								3D	SoM	5S3					C.W. Zollmer
3788	024	361 Brannan	1928		Y								3D	SoM	5S3					C.W. Zollmer
3787	048	415 Brannan	1923		Y									SoM	5D3		SE-A			
3787	033	425 Brannan	1924		Y									SoM	5B		SE-A			Arthur S. Bugbee
3776	015	426 Brannan	1926		Y									SoM	5S3	D				
3776	151	434 Brannan			Y									SoM	5S3		SE-A	C	5B	
3787	151	435 Brannan	1910		Y									SoM	5B		SE-A			
3778	004	630-698 Brannan	1956	San Francisco Flower Mart	Y								7R	SoM	3CD	A	SFFM			
3776	020	444 Brannan	1924		Y									SoM	5S3					O'Brien Brothers
3775	086	453 Bryant	1912		Y									SoM	5S3					
3775	085	457 Bryant	1909		Y									SoM	3CS					
3763	015A	460 Bryant	1907	Fleischmann Co. Bldg.	Y									SoM	5S3	C				James R. Miller
3775	084	461 Bryant	1912		Y									SoM	5S3	C				Oliver Everett
3776	094	531 Bryant			Y									SoM	5S3					
3776	041	539 Bryant	1912		Y									SoM	3S	B				Nathaniel Blaisdell
3762	021	556 Bryant	1921		Y									SoM	5S3					
3778	001	701 Bryant	1926		Y									SoM	3CS					
3760	014	704 Bryant	1914		Y									SoM	5S3					
3753	056	215 Clara	1927		Y									SoM	5S3					Arthur S. Bugbee
3753	048	241 Clara	1916		Y									SoM	5S3					
3788	012	166 Town~~nd~~send/ 21 Clarence	1906	Calif. Electric Light Co.	Y		SE	C				SE	2D	SoM	3D	A				Percy & Hamilton
3732	064	444 Clem~~ne~~ntina	1925		Y									SoM	5S3	C				
3787	017	18 Clyde	1907		Y									SoM	5D3					

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3735	013	666 Folsom	1964	Pacific Telephone	N									TC	3S					John Carl Warnecke
3733	019	844 Folsom	1923		Y									SoM	5S3					R.W. Jenkins
3733	020	848 Folsom	1923		Y									SoM	5S3					
3733	020A	854 Folsom	1926		Y									SoM	5S3					
3733	024	868 Folsom	1935		Y									SoM	3CS					N. B. Green (eng.)
3753	145	915 Folsom	1907		Y									SoM	5S3					Frederick Noonan
3753	132	969 Folsom	1922		Y									SoM	5S3					Samuel C. Heiman
3753	313	925-945 Folsom	1923	Fire Station #1	Y									SoM	3CS					
3732	151	974 Folsom	1936		Y									SoM	5S3					
3763	105	645 Harrison	1947		Y									SoM	3S					H. C. Baumann
3763	099	665 Harrison	1946		Y									SoM	3S					
3762	116	735 Harrison	1915		Y									SoM	3S					
3760	081	943 Harrison	1947		Y									SoM	5S3					
3753	029	986 Harrison	1926		Y									SoM	5S3					None
3735	041	20 Hawthorne	1925		N				~~III~~IV							B				
3722	020	606 Howard			N					N-S		SH	1D			C*				
3735	005	621 Howard	1929	William Volker Bldg.	N				II	N-S			3S			C				George Kelham
3735	039	667 Howard	1907		N				~~III~~IV							B				Trobridge & Livingston
3733	088	821 Howard		Southern Police Station	N											C			3CS	
3733	084	835 Howard	1909	Home Telephone Bldg.	N				II							A				Coxhead & Coxhead
3733	082	843 Howard			N														3CS	
3725	020	964 Howard	1907		Y								6Y	SoM	3CS	C				
3707	032	163 Jessie		Hess Bldg.	N					N-S				TC	3S, 3CB					
3705	034	308 Jessie			N												~~KM-A~~	C	5D3	
3705	008	315 Jessie	1907	Guggenheim/Heuter Bldg.	N				II							B*				Chas. F. Whittlesey
3704	079	410 Jessie	1926	Hale's Warehouse & Food	N								1S			C	MM	C	3CB	
3704	028	471 Jessie	1912		N				V							C	MM	C	3CD	
3704	029	431 Jessie			N												MM	C	3CD	
3704	035	440 Jessie			N												MM	C	3CD	
3704	024	481 Jessie		Hulse Bradford Bldg.	N												MM	C	3CB	

Key:

In PA (In Plan Area): Yes/No

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Last updated: November 7, 2017

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MS – Market Street Theater and Loft District
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BTW – Bluxome-Townsend Warehouse
KM-A – KMMS District Addition
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TABLE APX-C-1:
HISTORIC ARCHITECTURAL RESOURCES IN THE PLAN AREA AND VICINITY (cont'd.)

Blk	Lot	Address	Year Built	Name	In PA	LM	Ex. Dist.	Dist. Rat.	Art 11	Con. Dist.	HT	NR Dist.	Rat.	Prior Svy.	Rat.	HR	Pot. Dist.	C?	Final Rating	Architect (if known)
3787	022	25 Lusk	1917		Y									SoM	5B	C	SE-A			
3787	019	45 Lusk	1922		Y									SoM	5B		SE-A			
3707	001	601 Market	1917;'21	Santa Fe/West Coast Life	N				IV	N-S			2S2			B				Wood & Simpson
3707	002A	609 Market	1914		N				IV	N-S			3S			C				Alfred H. Jacobs
3707	061	625 Market			N					N-S			3S							
3707	052	643 Market	1909;'15–'26;'50	Palace Hotel, Garden Courtyard	N	18		C	II	N-S	Y		3S			A				Trowbridge & Livingston; G.Kelham
3707	051	681 Market	1906	Monadnock Bldg.	N				I	N-S			3S			B				Meyer and O'Brien
3706	001	701 Market	1896; 1938	Call/Claus Spreckels Bldg.	N				III				3S			B				Reid Bros.; Albert Roller
3706	064	715 Market	1906; 1940	Kamm Bldg./Morris Plan Co. Bldg.	N											C			5S3	Bliss& Faville;Bliss & Fairweather;Hurt
3706	062	725 Market	1908	Bancroft Bldg.	N				II	K-S			3S			B				Cunninghan & Politeo
3706	061	735 Market	1907	Carroll and Tilton Bldg.	N				II	K-S			1S			B				Willis Polk
3706	075	785 Market	1907	Humboldt Bank Bldg.	N				I	K-S	Y		3S			A				Meyer & O'Brien
3705Z	001	801 Market	1907	Pacific Bldg.	N					K-S			3S							C. F. Whittlesey
3705	037	825 Market	1908	Commercial Bldg.	N				II	K-S			3S			B				Louis Hobart
3705	050	845 Market	1896; 1908	The Emporium	N				I	K-S	Y		2D2			A				Albert Pissis and Joseph Moore
3705	042	865 Market		Westfield Center	N					K-S			3S							
3704	001	901 Market	1912	Hale Brothers Dep't. Store	N				I	K-S	Y	MS	1S			A				Reid Brothers
3704	069	973 Market	1900; 1907	Wilson Bldg.	N				II		Y	MS	1D			A				G. Percy & H. Meyers; Henry Schulze
3704	068	979 Market	1900'; 05;'07	Hale Brothers Dep't. Store	N				II			MS	1D			A				Reid Brothers
3722	071	138 Minna	1902; 1910	Rialto Bldg.	N				I	N-S			3S			A				Meyer & O'Brien; Bliss & Faville
3722	068	150 Minna	1907	McLaughlin Bldg.	N					N-S				TC	3CD	C				William Koenig
3725	094	425 Minna	1967	San Francisco Chronicle	N														3CS	
3725	076	447 Minna	1907	Dempster Brothers Printing	N				I							B			3S	Mooser & Milwain
3725	075	453 Minna			N													C	5S3	
3704	144	8 Mint	1924	Hale Brothers	N								1S				MM	C	3CD	
3704	113	10 Mint	1924	Hale Brothers	N								1S				MM	C	3CD	

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TABLE APX-C-1:
HISTORIC ARCHITECTURAL RESOURCES IN THE PLAN AREA AND VICINITY (cont'd.)

Blk	Lot	Address	Year Built	Name	In PA	LM	Ex. Dist.	Dist. Rat.	Art 11	Con. Dist.	HT	NR Dist.	Rat.	Prior Svy.	Rat.	HR	Pot. Dist.	C?	Final Rating	Architect (if known)
3704	034	14 Mint	1907	Haas Candy Factory	N				I				1S			B	MM	C	1S, 3CB	William Curlett
3704	012	66 Mint	1916		N				I							B	MM	C	3CB	Frederick Whitton
3722	073	617 Mission	1902;'08	The Crellin Bldg.	N				IV	N-S			2D2			C				Walter J. Mathews
3722	069	647 Mission	1907	Veronica Bldg.	N				I	N-S				TC	3S, 3CB	C				Salfield & Kohlberg
3707	020	658 Mission	1902;'06	Textile Bldg.	N				I	N-S				TC	3S, 3CB	C				
3706	276	736 Mission	1906–09	Jessie Street Substation	N	87					Y		1S			A				Willis Polk
3706	068	748 Mission	1872	Saint Patrick's Church	N	4		C			Y		2S			C				
3706	014	766 Mission		St. Patrick's Ch'ch Rectory	N												SP	C	3CD	
3705	007	808 Mission			N				II							B				
3725	093	901 Mission		San Francisco Chronicle	N											C*			3CS	
3725	088	951 Mission		Ford Apartments	N											C	MM	C	3CD	
3725	087	959 Mission	1905–06	California Casket Co.	N				II							A	MM	C	3CB	Albert Pissis
3704	013	936 Mission	1915	Chronicle Hotel	N				V							C	MM	C	3CD	
3704	017	948 Mission	1907	Alkain Hotel	N				V							C	MM	C	3CB	Phillip Schwerdt
3704	019	966 Mission			N												MM	C	3CD	
3704	021	972 Mission			N												MM	C	3CB	
3704	022	980 Mission			N												MM	C	3CB	
3722	006	116 Natoma	1910	N. Clark and Sons	N				I	N-S		SH	1D			B				Cunningham & Politeo
3722	014	145 Natoma	1968		N					N-S				TC	3S, 7N1					
3722	013	147 Natoma	1908	Underwriters Fire Patrol Bldg.	N				I	N-S	Y			TC	3S, 3CB	B*				Clifton Day
3725	042	430 Natoma			N													C	3CS	
3725	060	496 Natoma	1926		Y									SoM	3D					
3707	035	39 N. Mont'g'y	1912	The Sharon Bldg.	N	163			I	N-S	Y		3S			A				George W. Kelham
3707	064	74 N. Mont'g'y	1914	Call Bldg.	N				I	N-S	Y		3S			A				Reid Brothers
3707	014	77 N. Mont'g'y	1907;'20	Crossley Bldg.	N				I	N-S			3S			C				Mel. Schwartz ('20)
3722	072	111 N Mont'g'y	1907	Standard Bldg.	N				IV	N-S		SH	1D			C				Reid Brothers
3722	007	137 N Mont'g'y	1907		N				IV	N-S		SH	1D			C				Henry Schluze

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TABLE APX-C-1:
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3722	080	140 N Mont'g'y	1925	Pacific Telephone and Telegraph Company	N				I	N-S						A				T. Pflueger, J.R. Miller;A.A. Cantin
3722	022	170 N Mont'g'y	1920	S.F. Furniture Exchange	N				IV	N-S			3S			C				Ken. Macdonald, Jr.
3762	106	120 Perry	1919		Y									SoM	3S					
3787	036	322 Ritch	1906		Y		SE					SE	5B	SoM	5B	B	SE-A			
3787	040	360 Ritch	1920	Old: S.F. Pie Co.	Y									SoM	5D3		SE-A			
3753	097	229 Shipley	1916		Y									SoM	5S3					None
3775	181	1 South Park	1913	Tobacco Co. of California	Y		SE					SE	2D	SoM	3D	B	SoP			William H. Crim, Jr
3775	046	17 South Park	1934		Y									SoM	5D3		SoP			
3775	042	21 South Park			Y									SoM	5B	C	SoP			
3775	048	22 South Park	1915		Y									SoM	5B	C*	SoP			
3775	049	26 South Park	1907		Y									SoM	5D3	C	SoP			
3775	102	33 South Park	1920		Y		SE							SoM	5B	C	SoP			
3775	040	41 South Park	1911		Y									SoM	5D3	C	SoP			
3775	039	45 South Park	1909		Y									SoM	5D3	C	SoP			
3775	054	76 South Park	1906		Y									SoM	5D3	C	SoP			
3775	057	102 S. Park	1912		Y									SoM	5B	C	SoP			
3775	058	104 S. Park	1907		Y									SoM	5D3		SoP			
3775	059	108 S. Park	1914		Y									SoM	5D3		SoP			
3775	179	117 S. Park			Y									SoM	5D3		SoP			
3775	061	126 S. Park	1907		Y									SoM	5D3		SoP			
3775	062	130 S. Park	1913		Y									SoM	5D3	D	SoP			
3775	033	135 S. Park	1925		Y									SoM	5D3		SoP			
3775	064	140 S .Park	1907		Y									SoM	5D3		SoP			
3775	030	155 S. Park	1925		Y									SoM	5D3		SoP			
3775	066	156 S. Park	1924		Y									SoM	5D3		SoP			
3775	067	160 S. Park	1920		Y									SoM	5D3	C	SoP			
3775	028	165 S. Park			Y									SoM	5D3	C	SoP			
3775	070	166 S. Park			Y									SoM	5D3	C	SoP			
3775	137	171 S. Park	1910		Y									SoM	5D3	C	SoP			
3707	044	111 Stevenson	1921	Palace Garage	N				I	N-S			3S			B				O'Brien Brothers
3704	059	443 Stevenson			N												MM	C	3CD	

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3763	033	31 Stillman	1906		Y									SoM	5S3					
3762	037	177 Stillman	1924		Y									SoM	3CS					
3788	008	130 Townsend	1906	Inglenook Vineyard Agcy.	Y		SE	CA				SE	2D	SoM	3D	B				
3788	009	136 Townsend	1913	Clinton Fireproofing Co.	Y		SE	C				SE	2D	SoM	3D	C				R.V. Woods, engr.
3788	009A	144 Townsend	1922	Clinton Construction Co.	Y		SE	C				SE	2D	SoM	3D	C				H. C. Baumann
3788	010	148 Townsend	1922	Winchester-Simmons Co.	Y		SE					SE	2D	SoM	3D	C				
3788	074	164 Townsend	1920	Winchester-Simmons Co..	Y		SE	C				SE	2D	SoM	3D	C				H. C. Baumann
3788	013	180 Townsend	1905	California Wine Assn.	Y		SE	C				SE	2D	SoM	3D	B*				Meyer & O'Brien/ J. Powers
3787	013	224 Townsend	1935		Y		SE					SE	6Y	SoM	5B	C	SE-A			
3787	018	228 Townsend	1909	Townsend House	Y		SE					SE	6Y	SoM	5D3		SE-A			
3786	263	310 Townsend	1920		Y						Y		6Y	SoM	6Z	B*				
3786	015	350 Townsend	1905	Paul Wood Warehouse	Y								2S2			B				
3785	005	466 Townsend	1920	Holbrook Merrill & Stetson	Y								2S2	SoM	2S2	C	BTW			

CALIFORNIA REGISTER/ NATIONAL REGISTER STATUS CODES (RATINGS)

1 Properties listed in the National Register (NR) or the California Register (CR)
1D - Contributor to a district or multiple resource property listed in NR by the Keeper. Listed in the CR.
1S - Individual property listed in NR by the Keeper. Listed in the CR.
1CL - Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after 12/97 and recommended for listing by the SHRC.

2 Properties determined eligible for listing in the National Register (NR) or the California Register (CR)
2D - Contributor to a district determined eligible for NR by the Keeper. Listed in the CR.
2D2 - Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in the CR.
2S - Individual property determined eligible for NR by the Keeper. Listed in the CR.
2S2 - Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.

3 Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation
3B - Appears eligible for NR both individually and as a contributor to a NR eligible district through survey evaluation.
3D - Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
3S - Appears eligible for NR as an individual property through survey evaluation.
3CB - Appears eligible for CR both individually and as a contributor to a CR eligible district through a survey evaluation.
3CD - Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation.
3CS - Appears eligible for CR as an individual property through survey evaluation.

4 Appears eligible for National Register (NR) or California Register (CR) through other evaluation

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HISTORIC ARCHITECTURAL RESOURCES IN THE PLAN AREA AND VICINITY (cont'd.)

5 Properties Recognized as Historically Significant by Local Government
5D3 - Appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation.
5S2 - Individual property that is eligible for local listing or designation.
5S3 - Appears to be individually eligible for local listing or designation through survey evaluation.
5B - Locally significant both individually (listed, eligible, or appears eligible) and as a contributor to a district that is locally listed, designated, determined eligible or appears eligible through survey evaluation.

6 Not Eligible for Listing or Designation as specified

7 Not Evaluated for National Register (NR) or California Register (CR) or Needs Revaluation
7N1 - Needs to be reevaluated (Formerly NR SC4) – may become eligible for NR w/restoration or when meets other specific conditions.

NOTE: List includes only those status codes that appear in the table.

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TABLE APX-C-2:
POTENTIAL HISTORIC RESOURCES IN THE PLAN AREA AND VICINITY (MORE INFORMATION REQUIRED)

Block/Lot	Address	Year Built
3733093	266 4th Street	1962
3733030	275 5th Street	1965
3753038	271 Clara Street	1907
3753072	258 Clara Street	1926
3753077	274 Clara Street	1906
3725014	934 Howard Street	1924
3725018	952 Howard Street	1923
3725035	82 Mary Street	1910
3753025	972 Harrison Street	1911
3753059	214 Clara Street	1911
3753063	228 Clara Street	1916
3732143	925 Howard Street	1906
3732145A	915 Howard Street	1925
3732138	939 Howard Street	1925
3732139	937 Howard Street	1907
3753082	285 Shipley Street	1907
3753093	241 Shipley Street	1908
3753115	258 Shipley Street	1912
3753117	274 Shipley Street	1906
3753119	278 Shipley Street	1906
3732234	481 Clementina Street	1912
3753129	981 Folsom Street	1928
3753130	977 Folsom Street	1906
3753138	951 Folsom Street	1925
3732261	431 Tehama Street	1947
3725015	938 Howard Street	1924
3725017	948 Howard Street	1916
3725019	960 Howard Street	1920
3725031	445 Natoma Street	1923
3725033	433 Natoma Street	1914
3753139	947 Folsom Street	1912
3753026	976 Harrison Street	1909
3753027	980 Harrison Street	1926
3753028	984 Harrison Street	1913
3763020	491 3rd Street	1907
3763024	93 Stillman Street	1907
3763025	89 Stillman Street	1908
3763034	25 Stillman Street	1936
3762048	147 Stillman Street	1907
3762011	518 Bryant Street	1919
3762012	520 Bryant Street	1924
3762019	546 Bryant Street	1948
3763021	485 3rd Street	1907
3763032	35 Stillman Street	1924
3763100	657 Harrison Street	1946
3762055	123 Stillman Street	1923
3762123	514 Bryant Street	1928
3762124	554 Bryant Street	1920
3763008	414 Bryant Street	1907
3763009	420 Bryant Street	1922
3763013	436 Bryant Street	1908
3763014	440 Bryant Street	1923
3763015	444 Bryant Street	1923
3760059	963 Harrison Street	1927
3787049	411 Brannan Street	1938
3763012	432 Bryant Street	1921
3732090	443 Tehama Street	1929
3732090A	439 Tehama Street	1906
3732091	435 Tehama Street	1911
3732095	421 Tehama Street	1923
3732096	415 Tehama Street	1906
3732089	445 Tehama Street	1907
3732094	423 Tehama Street	1928
3732097	409 Tehama Street	1906
3732102	424 Tehama Street	1906
3732103	927 Howard Street	1923
3732106	436 Tehama Street	1907
3732108	442 Tehama Street	1906
3732112	452 Tehama Street	1922
3732117	472 Tehama Street	1926
3732100	921 Howard Street	1924
3732107	440 Tehama Street	1925
3732119	981 Howard Street	1927
3732130	973 Howard Street	1909
3732066	450 Clementina Street	1927
3732067	452 Clementina Street	1909
3733026	884 Folsom Street	1915
3733034	379 Clementina Street	1911
3750008	642 Harrison Street	1925
3751033	768 Harrison Street	1930
3733092	862 Folsom Street	1911
3752027	159 Clara Street	1906
3786020	17 Bluxome Street	1924
3752083	885 Folsom Street	1907
3777027	152 Freelon Street	1925
3777029	119 Freelon Street	1908
3778017	559 6th Street	1936

Table ApX-C-2:

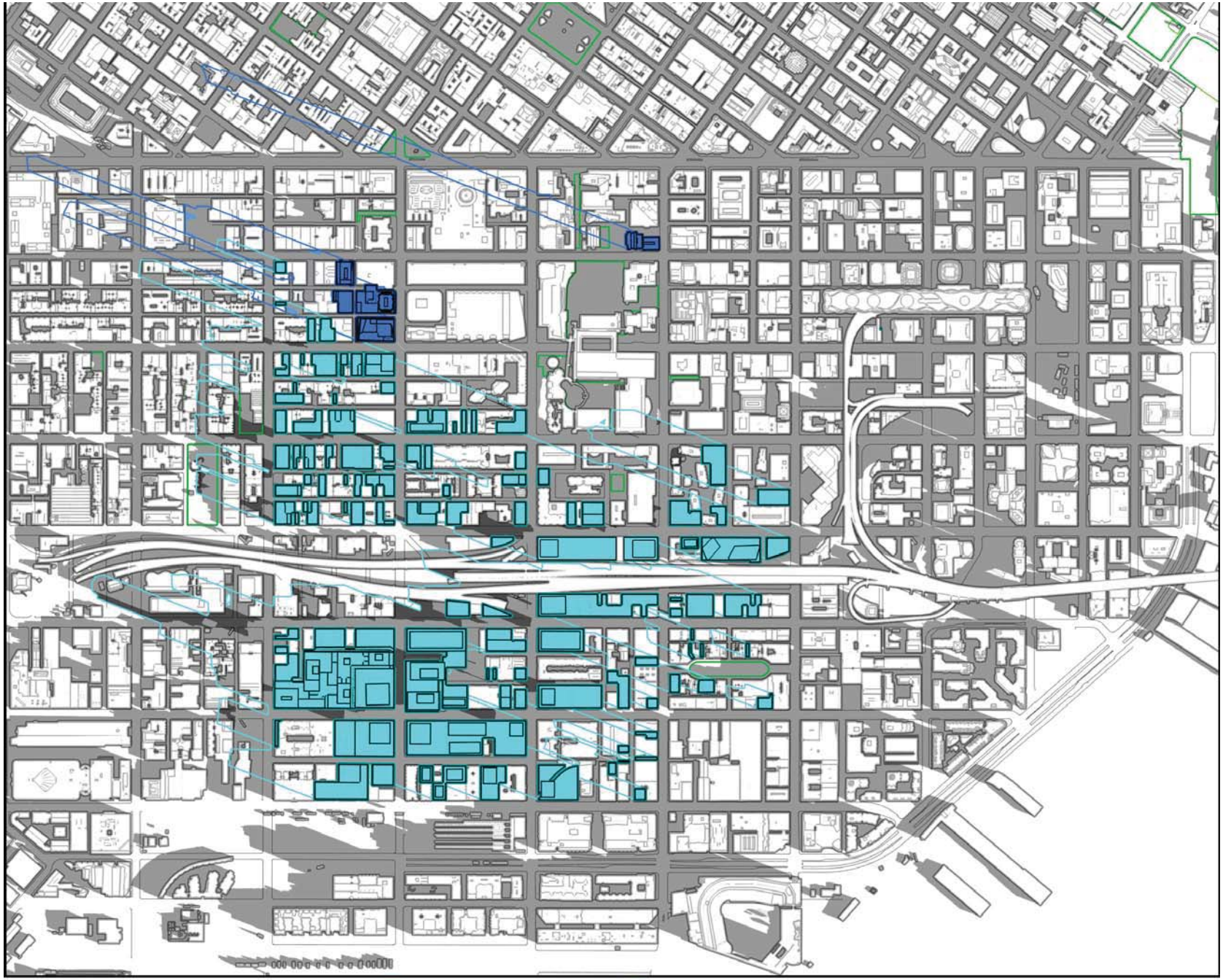
POTENTIAL HISTORIC Resources in the Plan area AND VICINITY (MORE INFORMATION REQUIRED) (continued)

Block/Lot	Address	Year Built
3778032	154 Morris Street	1955
3778046C	749 Bryant Street	1925
3778046D	765 Bryant Street	1925
3778046E	745 Bryant Street	1925
3778046G	761 Bryant Street	1925
3778046H	753 Bryant Street	1925
3778047	610 Brannan Street	1952
3778046F	757 Bryant Street	1925
3776100	212 Ritch Street	1924
3776105	248 Ritch Street	1915
3776106	252 Ritch Street	1915
3777030	103 Freelon Street	1908
3777042	552 Brannan Street	1923
3777045	598 Brannan Street	1952
3778001C	725 Bryant Street	1925
3778001D	731 Bryant Street	1924
3778001F	715 Bryant Street	1925
3777011	629 Bryant Street	1931
3777023	132 Freelon Street	1907
3777025	142 Freelon Street	1909
3777026	146 Freelon Street	1908
3775018	362 Brannan Street	1925
3775020	370 Brannan Street	1937
3775021	374 Brannan Street	1908
3775022	376 Brannan Street	1908
3777044	560 Brannan Street	1929
3777049	655 Bryant Street	1935
3778001E	721 Bryant Street	1925
3775075	489 Bryant Street	1922
3775081	469 Bryant Street	1922
3763015B	448 Bryant Street	1924

Block/Lot	Address	Year Built
3763015C	460 Bryant Street	1907
3762025	570 Bryant Street	1906
3775087	445 Bryant Street	1948
3775089	439 Bryant Street	1923
3775091	435 Bryant Street	1923
3775092	433 Bryant Street	1907
3775094	427 Bryant Street	1946
3775095	425 Bryant Street	1923
3775096	421 Bryant Street	1923
3775093	431 Bryant Street	1923

APPENDIX E

Shadow Modeling Results [Revised]



Central SoMa Plan
June 21 Sunrise +1 Hour (6:47 am)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 7:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 8:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 9:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



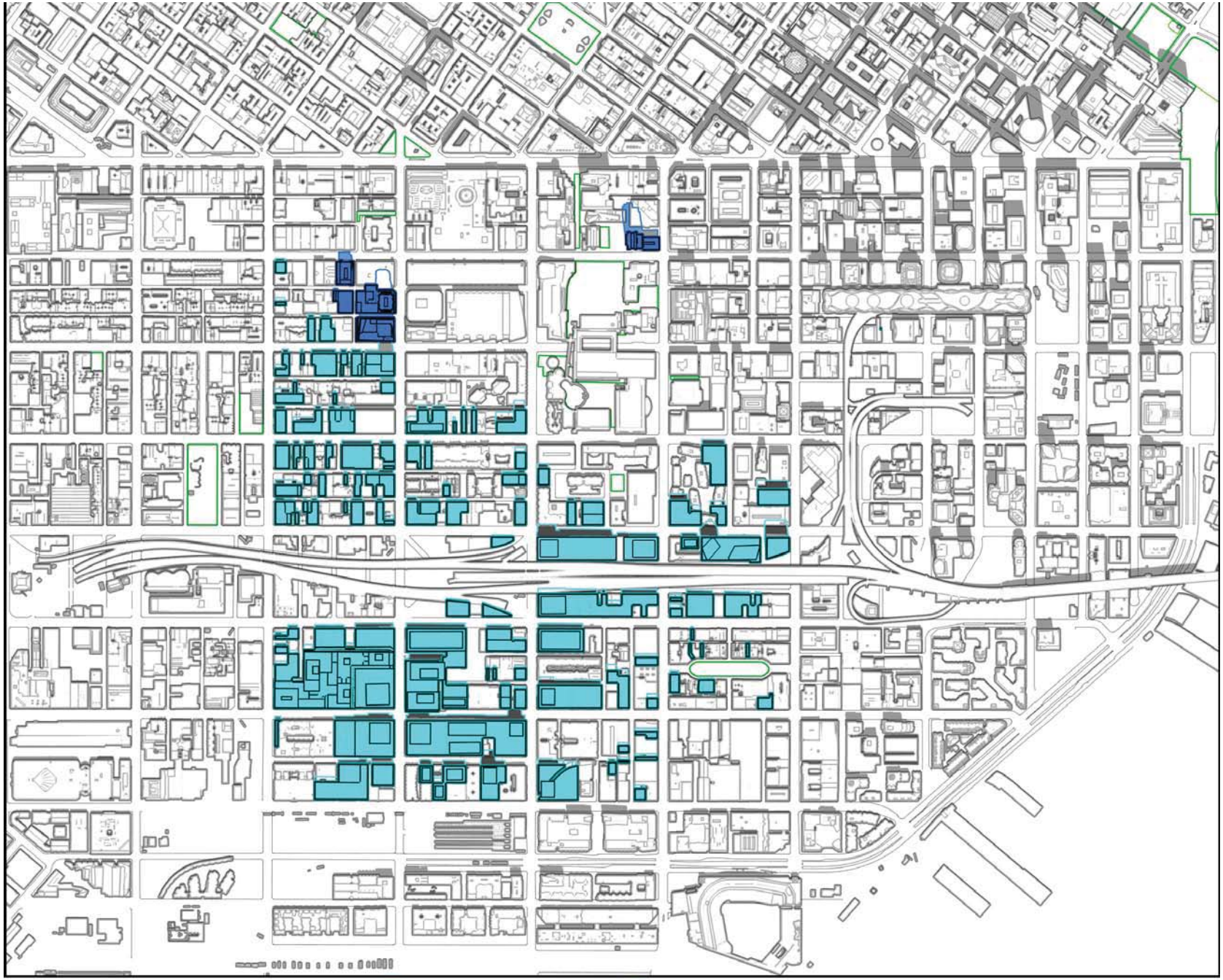
Central SoMa Plan
June 21 10:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



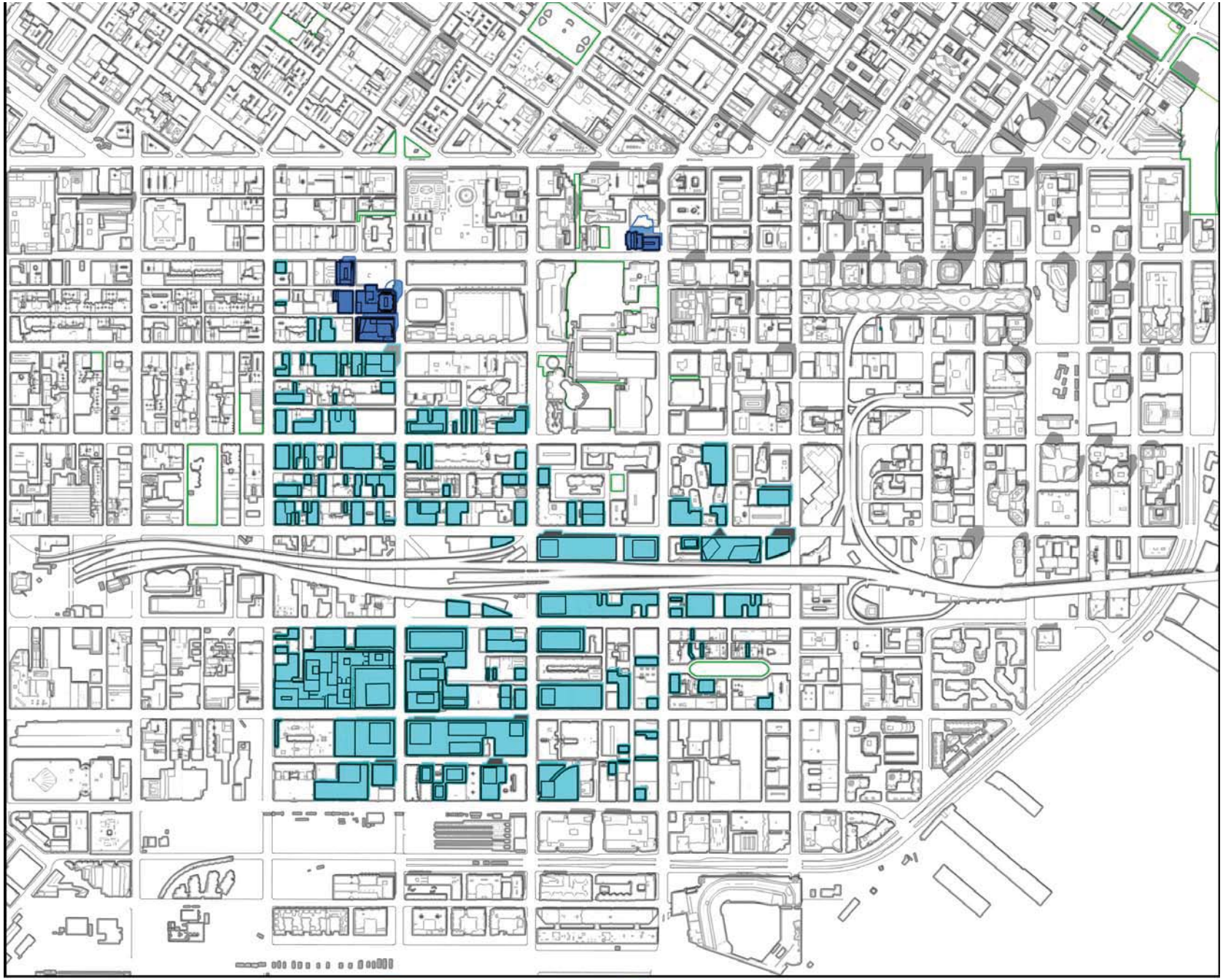
Central SoMa Plan
June 21 1:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 12:00 noon

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 1:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 2:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 3:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 4:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 5:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
June 21 6:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



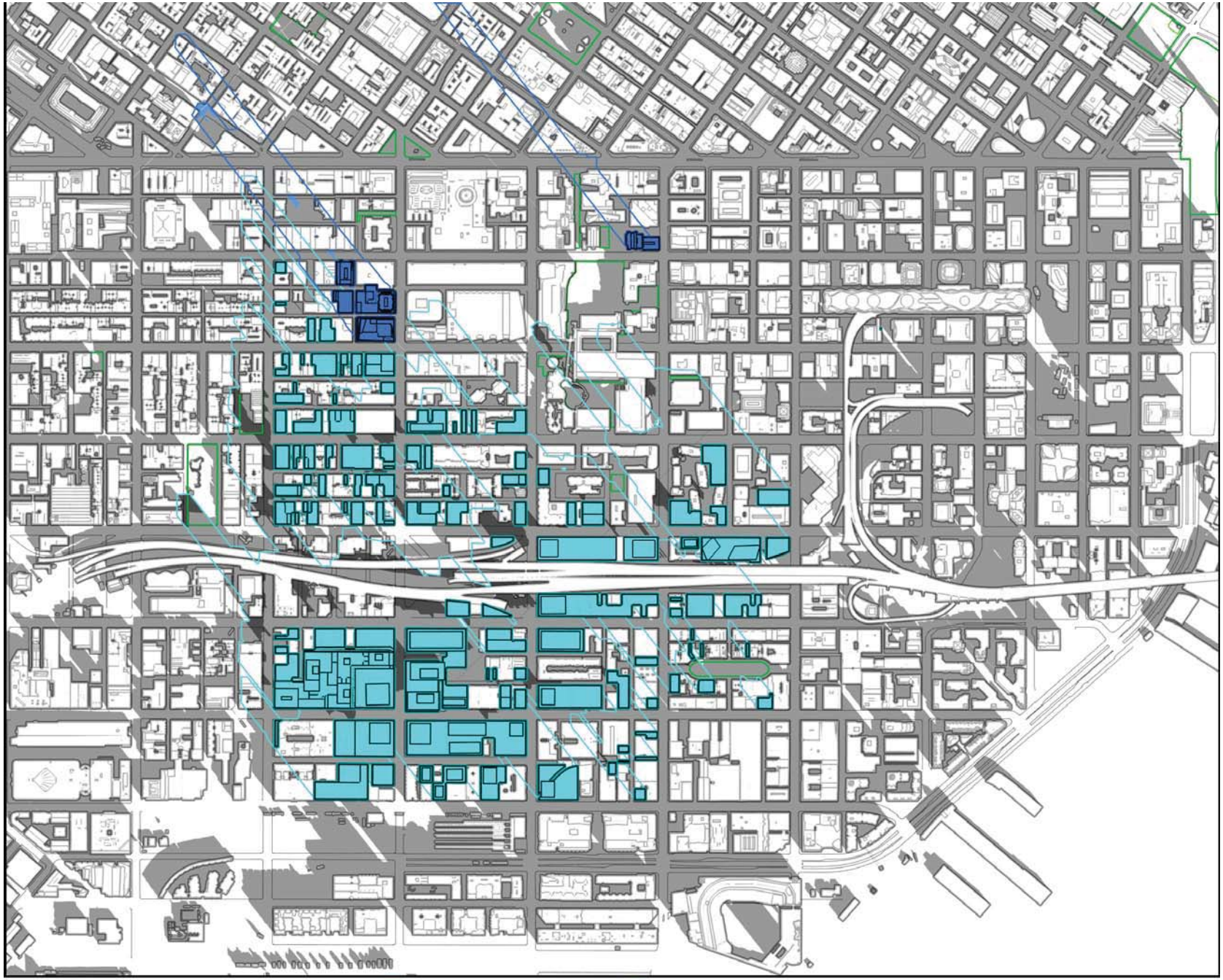
Central SoMa Plan
June 21 7:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



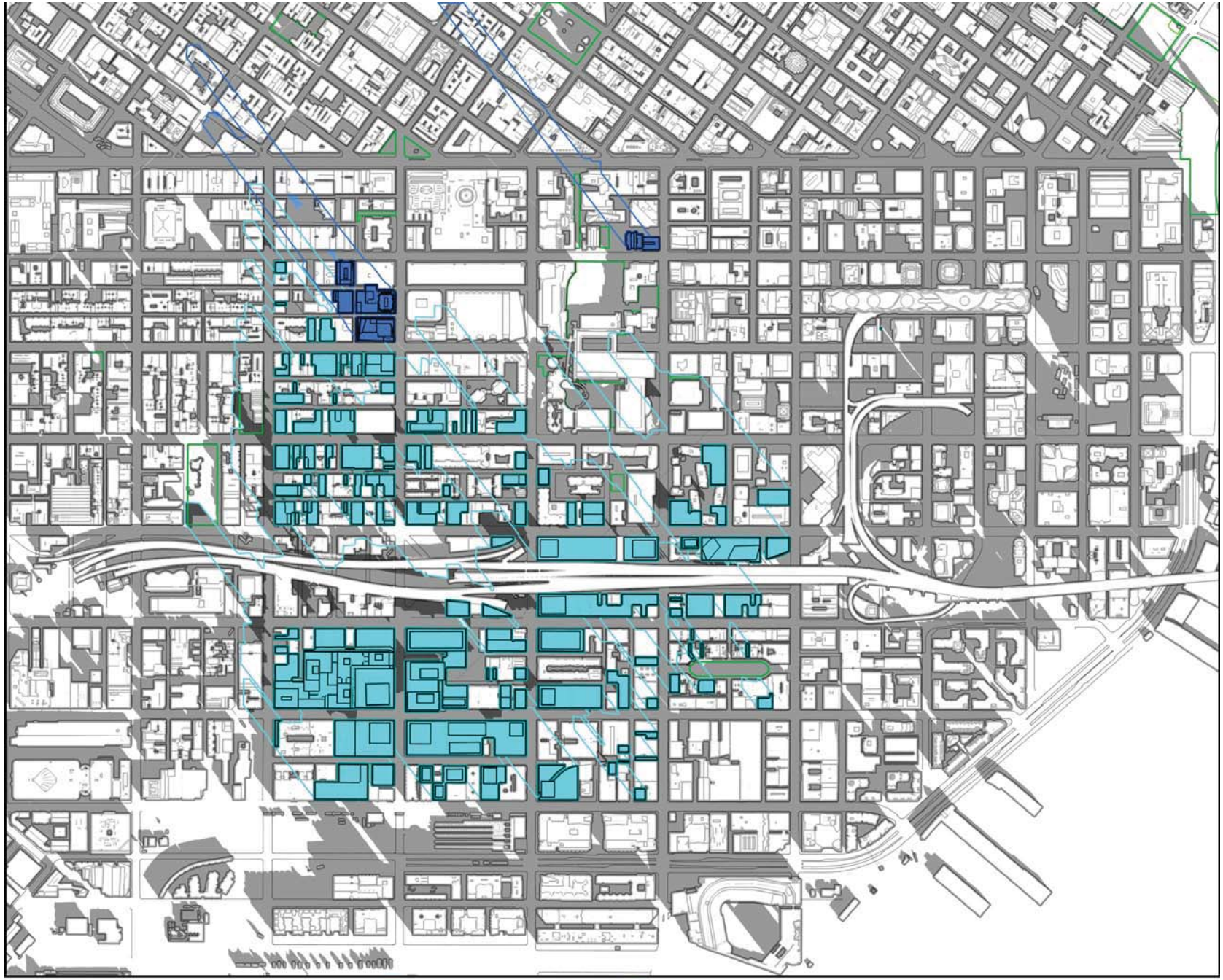
Central SoMa Plan
June 21 Sunset -1 Hour (7:36 pm)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 Sunrise +1 Hour (7:57 am)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 8:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 9:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



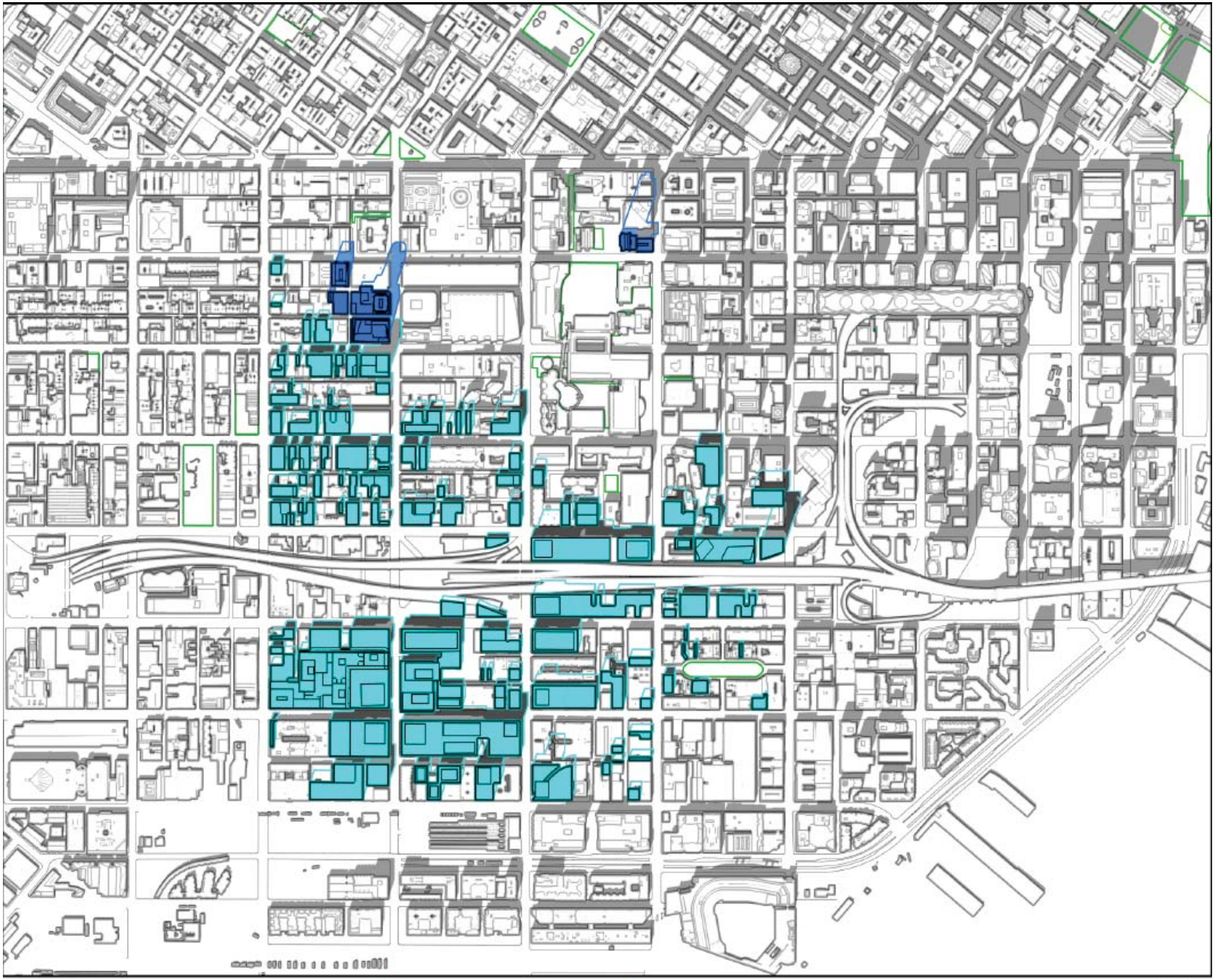
Central SoMa Plan
September 20 10:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 11:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 12:00 noon

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 1:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 2:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 3:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 4:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 5:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
September 20 6:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



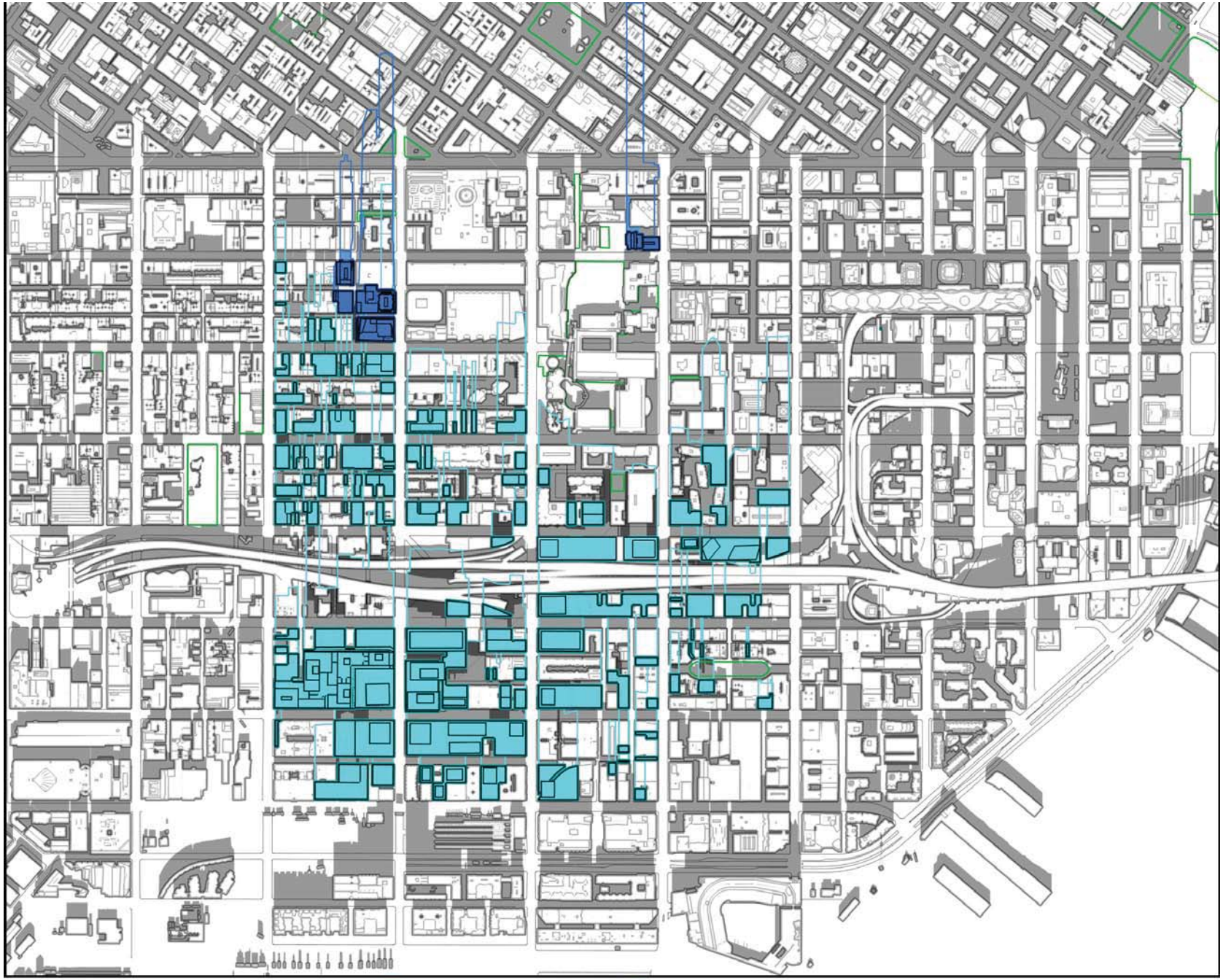
Central SoMa Plan
September 20 Sunset -1 Hour (6:09 pm)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 Sunrise +1 Hour (8:20 am)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 9:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 10:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 11:00 am

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 12:00 noon

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 1:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 2:00 pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 3:00pm

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows



Central SoMa Plan
December 20 Sunset -1 Hour (3:54 pm)

Proposed New Buildings
Proposed New Buildings Net New Shadows
Existing Shadows
Proposed New Buildings 5M & 706 Mission
Proposed New Buildings 5M & 706 Mission Net New Shadows