XI. COMMENTS AND RESPONSES

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A. INTRODUCTION

This document contains public comments received on the Draft Environmental Impact Report ("Draft EIR" or "DEIR") prepared for the proposed Balboa Park Station Area Plan and responses to those comments. Also included in this document are staff-initiated text changes.

Section B contains a list of all persons and organizations who submitted written comments on the Draft EIR and who testified at the public hearing on the Draft EIR held on October 25, 2007.

Section C contains substantive comments on the Draft EIR made orally during the public hearing and received in writing during the public comment period, from September 21 through November 5, 2007. Comments are grouped by environmental topic and generally correspond to the table of contents of the Draft EIR. Comments that do not address a particular topic or are not related to environmental issues are included under General Comments or Non-CEQA Related Issues. The name of the commenter, agency, or organization is indicated following each comment summary.

Section D contains text changes to the Draft EIR made by the EIR preparers subsequent to publication of the Draft EIR to correct or clarify information presented in the Draft EIR, including changes to the Draft EIR text made in response to comments.

Some of the responses to comments on the Draft EIR provide clarification regarding the Draft EIR. Where applicable, changes have been made to the text of the Draft EIR, and are shown in double underline for additions and ~~strikethrough~~ for deletions. The purpose of these text changes is primarily to clarify information already provided in the Draft EIR. These changes do no represent new information that would alter the analysis or conclusions presented in the Draft EIR; therefore, these changes would not require recirculation of the Draft EIR, pursuant to CEQA Guidelines Section 15088.5.

The comment letters received and the transcript of the public hearing are reproduced in Attachment 1. The first page of Attachment 1 includes a table showing the comment number, commenter, agency/organization, date, and comment type. The transcript of the public hearing is included as part of Attachment 1 (Comment Numbers 3 and 4). In addition, a memorandum to address calculations of greenhouse gas (GHG) emissions required by Assembly Bill 32 (2006) and the latest Office of Planning and Research Technical Advisory is in Attachment 2.

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

B. LIST OF PERSONS COMMENTING

The following individuals submitted written comments during the public comment period of September 21, 2007 through November 5, 2007 and/or provided oral testimony at the public hearing on October 25, 2007 on the Balboa Park Station Area Plan Draft EIR.

WRITTEN COMMENTS

State Agencies

Timothy Sable, Caltrans, letter, November 5, 2007

City Agencies

Bridget Maley, President, Landmarks Preservation Advisory Board (LPAB), letter, October 29, 2007

Rana Ahmadi, James Lowe, Sam Fielding, Metropolitan Transit Authority (MTA), letter, November 2, 2007

Kevin Keck, MTA, letter, November 5, 2007

Tim Chan, BART, letter, November 5, 2007

Organizations and Individuals

Dan Weaver, e-mail, October 10, 2007

Greg Clinton, Westwood Park Association, letter, October 25, 2007

Ilene Dick, Farella Braun + Martel LLP, letter, November 2, 2007

Rita Evans, Sunnyside Neighborhood Association, letter, November 4, 2007

Ken and Laura Ryckwalski, letter, November 5, 2007

James Blomquist, Vice Chancellor, City College of San Francisco, letter, November 5, 2007

SPEAKERS AT THE PUBLIC HEARING, OCTOBER 25, 2007

Commissioner Kathrin Moore

Commissioner Michael Antonini

C. COMMENTS AND RESPONSES

1. GENERAL COMMENTS

Comment

I think it's a well done document. Ocean Avenue has historically been always an area with a lot of transit and, in fact, a lot of transportation through it in all sorts of forms back a hundred and fifty years ago when it was basically the only way to reach the ocean from the southern part of San Francisco, and I think that's obviously going to continue. And I think some of the changes that are proposed here are good solutions to address the traffic problems. There will always be quite a few there I think the key is to be able to figure out a way to calm it enough that you can still get the residents and those using BART and other services in and out of there while still making the area pedestrian friendly and that's going to be a challenge but I think it is has a ton of potential and, as I have mentioned in the hearing on the last time we took this up, I think we should look at, you know, best practices in other areas throughout the Bay Area that have this sort a of configuration of BART and freeways and other local transit coming together in the same location and see which address the problems more successfully. This may be one of the most challenging of all but thank you. (*Commissioner Antonini. Commission Hearing 10/25/2007, Comment No. 4)*

Response

This comment is acknowledged. The comment does not relate to environmental issues but rather relates to general comments regarding the Balboa Park Station Area Plan, and therefore, no response is necessary.

Comment

Next Steps

Balboa Station is well-served by Muni and BART lines, and the city's interest in promoting development in the immediate area is understandable. It is in our interest as local residents to see that such development does not degrade our neighborhood and change its existing character.

The Draft Environmental Impact Report, Balboa Park Station Area Plan lays out some interesting scenarios but the City needs to address the lack of measures to mitigate the very significant negative impacts identified in the report. The Planning Department owes us more than vague descriptions of something that "could" happen. We deserve assurances that the significant impacts described in the DEIR are balanced with effective mitigation measures.

We look forward to the next version of the EIR incorporating the points outlined above. (*Sunnyside Neighborhood Association. Letter, Comment No. 87)*

Response

The purpose of an EIR is to evaluate the potential environmental impacts of a proposed project, identify potentially significant impacts, and identify mitigation measures to

reduce impacts to less than significant levels where appropriate. The EIR is also required to identify significant environmental effects that cannot be avoided if the proposed project is implemented. The preparation of an EIR does not indicate a decision by the City to approve or disapprove the proposed project. Rather, an EIR is an informational document that informs the public and public agency decision makers of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe alternatives to the project pursuant to CEQA Guidelines Section 15121. Because the project is not approved or disapproved, the EIR uses words such as "would" and "could" to analyze impacts that could potentially occur if the project were implemented.

The DEIR analyzed and identified potentially significant impacts of the proposed Area Plan for traffic, air quality, noise, hazards, historic architectural resources, and archaeology. Mitigation measures to reduce impacts to less-than-significant levels are presented on pp. 325-338 in the DEIR. Significant unavoidable transportation impacts were identified at Project Area intersections: Ocean Avenue/Junipero Serra Avenue; Ocean Avenue/I-280 Northbound On-Ramp; and Ocean Avenue/San Jose Avenue in 2025. Mitigation measures have been developed to address these significant traffic impacts, however because implementation of these measures is uncertain, for purposes of CEQA, impacts on these intersections would be considered potentially significant and unavoidable. In addition, the proposed transportation changes in the Area Plan would cause Ocean/Geneva/Phelan intersection and Geneva Avenue/I-280 Ramps to operate at unacceptable conditions in 2025. No feasible mitigation measures could be identified to reduce these impacts to less-than-significant levels.

Pursuant to CEQA Guidelines Section 15126.6, an EIR is required to 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. The Department determined that an alternative with no proposed transportation improvements might reduce or eliminate significant transportation impacts. The DEIR identifies two alternatives to the proposed Area Plan and discusses the environmental effects associated with the alternatives (pp. 347-365). State CEQA Guidelines Section 15126.6(c) states, "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed."

The Alternatives chapter includes separate specific discussion of each alternative and includes a conclusion on pp. 364-365 that identifies the environmentally superior alternative as Alternative B, the No Transportation Improvements Alternative.

Mitigation measures that would reduce or eliminate potential significant environmental impacts of the Area Plan are identified in Chapter V (pp. 325-337). Improvement measures that would reduce effects of the proposed Area Plan that were found through the environmental analysis to have less-than-significant impacts are identified on pp. 338-343.

Chapter VI of the DEIR (pp. 344-345) identifies significant environmental effects that cannot be avoided if the proposed project is implemented. The findings of significant impacts are subject to final determination by the Planning Commission as part of the certification process for the EIR. If the project as proposed is approved, it would result in significant environmental effects that cannot be avoided as identified in Chapter VI of the DEIR. In this case, the Planning Commission and Board of Supervisors would be required to adopt a "Statement of Overriding Considerations," which states the specific reasons to support the action of approving the project based on the final EIR and/or other information in the record (CEQA Guidelines Section 15093(b)).

Comment

As currently proposed, the Balboa Park Station Area Plan Project will provide a mix of land uses, including 1,780 new dwelling units, 104,620 square feet of commercial space, 19,000 square feet of cultural/institutional space and 129,300 square feet of open space. This land use mix will result in major new residential developments in close proximity to the Balboa Park BART Station. The project sponsor has proposed elements to enhance pedestrian, bicycle and transit access to the development sites. Through its Strategic Plan, adopted in 1999 and updated in 2003, BART supports urban infill projects with a strong pedestrian orientation and access to the local transit system. (*BART. Letter, Comment No. 146)*

Response

This comment is acknowledged. The comment expresses the commenter's support of the project. This comment does not relate to environmental issues, and therefore, no response is necessary.

Comment

Page 128, paragraph 2. The BART CSP was developed in tandem with the Balboa Park Station Area Plan and with support from partners including the City, MUNI, BART, Caltrans, City College, and neighborhood groups and residents. Recommended improvements from the CSP are also highlighted in the Station Area Plan. Please explain why they are not specified in the Area Plan. (*BART. Letter, Comment No. 156)*

Response

BART's 2002 Balboa Park Comprehensive Station Plan (CSP) was developed in tandem with the proposed Area Plan and incorporates the "Eight Elements of a Good Urban Neighborhood" outlined in the Better Neighborhoods Program. While the CSP is not

specifically addressed in the Station Area Plan, its key principles and many of its small-scale measures are in the Station Area Plan, including the redesign of the freeway off-ramps and proposed streetscape and street design improvements to address pedestrian safety.

Comment

Encroachment Permit

Any work or traffic control within the State ROW requires an encroachment permit that is issued by the Department. Traffic-related mitigation measures will be incorporated into the construction plans during the encroachment permit process. See the following website for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits/

To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans which clearly indicate State ROW to the address at the top of this letterhead, marked ATTN: Michael Condie, Mail Stop #5. (*Caltrans. Letter, Comment No. 162)*

Response

The comment is acknowledged. The City would comply with applicable regulatory and permitting requirements. Approval and implementation actions are listed under "Project Approvals" on pp. 107 and 108 of the DEIR.

2. PROJECT DESCRIPTION

Comment

Re: Correction on DEIR Balboa Area Plan Geneva Office Building Square Footage

This sq. footage is for the existing and proposed building. Is it possible for you to pass this onto Mr. Wycko?

Geneva Office Building and Powerhouse Gross Square Footage Calculations:

	Geneva Office Building	**Powerhouse**
Basement	**2,593**	
First Floor	**5,140**	**3,099**
Second Floor	**5,021**	
Subtotal	**12,754**	**3,099**
Total	**15,853**	

(Dan Weaver. Letter, Comment No. 1)

Response

Text in the DEIR for the Geneva Office Building Square Footage has been revised and described below to correct the square footage of the Geneva Office Building and the Powerhouse. This change does not affect the analysis or conclusions of the DEIR. The

text in the DEIR (p. 14, third bullet) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~).

- The Geneva Office Building and Powerhouse is Recreation and Park Department property. The Area Plan anticipates development of about 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses in this building.

The text in the DEIR (p. 99, Table 1) is revised as follows:

Table 1: Balboa Park Station Area Plan Three-Tier[1] Revised Land Use Program

Development Site	Residential Units (No. of Units)	Commercial Use (Sq. Ft.)	Cultural/Institutional Use (Sq. Ft.)	Open Space (Sq. Ft.)
Tier 1 (0-5 years)				
Upper Yard[2]	200	10,000	0	TBD[3]
Phelan Loop[4]	80	15,000	0	25,000
Kragen Auto[5]	175	35,000	0	4,300
Sunset Garage	0	0	7,000	TBD
Geneva Office Bldg	0	0	15,853~~12,000~~	TBD
Ocean Avenue Infill[6]	135	11,620	0	TBD
San Jose Avenue Infill in Station Area[6]	200	3,120	0	TBD
Tier 1 Total	**790**	**74,740**	**22,853 ~~19,000~~**	**29,300[7]**
Tier 2 (5-20 years)				
Firehouse[8]	80	10,000	0	0
Ocean Avenue Infill	330	19,880	0	0
San Jose Avenue Infill in Station Area	80	0	0	0
Reservoir[9]	500	0	0	100,000
Tier 2 Total	**990**	**29,880**	**0**	**100,000**
Tier 3 (20 years +)	**SPECULATIVE[10]**			

Notes:

[1] Tier 1 (0-5 years) = Short-term development.
Tier 2 (5-20 years) = Long-term development.
Tier 3 (beyond 20 years) = Speculative development.

[2] Site access from San Jose Avenue.

[3] TBD = To be determined, depending on size of development proposed.

[4] Site access from Lee Avenue.

[5] Two buildings with residential use above ground-floor retail to be developed on the Kragen Auto Parts Site. Up to ~~About~~ 30,000 sq. ft. of proposed retail would be a food market; the remaining up to 5,000 sq. ft would be other neighborhood-serving retail. Brighton, Harold, and Lee Avenues would be extended north at least for the length of the proposed development. Vehicular access to the residential uses would be from Brighton Avenue~~ and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses would be from Brighton Avenue, and vehicular egress from the non-residential uses would be onto Lee Avenue.

[6] Residential units in Ocean Avenue Infill do not have specific locations. About 40 units and a small amount of retail could be at the Donut Shop site, part of San Jose Avenue infill.

[7] Tier 1 Total Open Space sq. ft. may be more than 29,300 sq. ft. and up to about 40,000 sq. ft., depending on the amount of development proposed.

[8] The firehouse site would be developed only if the fire station were relocated to another site with the approval of the San Francisco Fire Department.

[9] City College controls 40% and SFPUC controls 60% of the reservoir site, respectively.

[10] Tier 3 development may occur beyond the year 2025. It is considered to be too speculative in nature to analyze in the EIR's 20-year time frame, through 2025.

The text in the DEIR (p. 105, third bullet) is revised as follows:

- The Geneva Office Building and Powerhouse is a vacant landmark building. It is Recreation and Park Department property. The Area Plan anticipates development of about 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses in this building, including an arts center for youth.

The text in the DEIR (p. 132, last paragraph, third sentence) is revised as follows. The number of housing units is also revised to state 615 units to be consistent with Table 3.

> Potential development in this subarea includes approximately ~~500~~615 housing units, 24,740 sq. ft of commercial space, and 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses (see Table 3 for proposed land use changes by subarea).

The text in the DEIR (p. 133, Table 3) is revised as follows:

Table 3: Balboa Park Station Area Plan - Summary of Land Use Changes by Subarea (by 2025)

Subarea / Site	Existing Land Use Description	Proposed Land Use				Tier [1]
		Residential (No. of Units)	Commercial (Sq. Ft.)	Cultural (Sq. Ft.)	Open Space [2] (Sq. Ft.)	
Transit Station Neighborhood Subarea						
Muni Upper Yard	Light rail maintenance/storage facility	200	10,000	0	TBD [3]	1
Donut Shop Property	Coffee shop with surface parking lot	40	TBD	0	TBD [3]	1
Geneva Office Building	Vacant Landmark Building	0	0	15,853~~12,000~~	TBD [3]	1
Ocean Avenue Infill	Potential opportunity sites	95	11,620	0	TBD [3]	1
San Jose Avenue Infill	Potential opportunity sites	280	3,120	0	TBD [3]	1, 2
Subarea Total		**615**	**24,740**	**15,853~~12,000~~**	**TBD** [3]	
Ocean Avenue Neighborhood Commercial District Subarea						
Phelan Loop	Muni bus turnaround	80	15,000	0	25,000	1
Kragen Auto Parts	Retail auto parts store	175	35,000	0	4,300	1
Sunset Garage	Vacant (site of proposed Ingleside Library)	0	0	7,000	0	1
Firehouse	SF Fire Department fire station	80	10,000	0	0	2
Ocean Avenue Infill	Potential opportunity sites	330	19,880	0	0	2
Subarea Total		**665**	**79,880**	**7,000**	**29,300**	
City College Subarea [4]	Academic uses, recreation, and parking					
Balboa Reservoir Subarea						
SFPUC Reservoir Property (reconfigured western portion)	CCSF student parking	**500**	0	0	**100,000**	**2**
Total Area Plan Development		**1,780**	**104,620**	**22,853~~19,000~~**	**129,300**	

Notes:

[1] The Development Program is phased by Tiers, based on when proposed development could occur. Tier 1 is short term development expected to occur within five years or by 2010; Tier 2 is long term, expected to occur between 5-20 years or by 2025.

[2] Includes open space associated with specific development sites. Does not include publicly accessible open space plazas, playgrounds, and neighborhood parks planned for the Transit Station Neighborhood and Ocean Avenue Neighborhood Commercial District subareas.

[3] The amount of required open space that would be provided for these sites cannot be determined until specific development projects are proposed.

[4] No development is assumed for the City College subarea. The Area Plan includes street network changes to improve access to City College.

Source: Balboa Park Station Area Plan Land Use Program; p. 48; San Francisco Planning Department; Pittman & Associates.

Comment

This project is consistent with the Area Plan not only because it will provide infill housing and commercial activity on an underutilized site in the Ocean Avenue commercial corridor, but its primary purpose is to build desperately needed rental housing and the required affordable housing units. Please amend the 1st bullet on p. 76 as follows: Insert "rental" before "housing" and insert at the end, "as required by Planning Code Section 315, the City's Inclusionary Housing Ordinance." (*Farella Braun + Martell LLP. Letter, Comment No. 13)*

Response

The text in the DEIR (p. 76, first bullet) is revised as follows to clarify the objective of the Kragen Auto Parts Site Development (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> Support the City's efforts to generate additional market-rate and affordable rental housing units as required by Planning Code Section 315, the City's Inclusionary Housing Ordinance;

Comment

PP. 13, 99, 136, 157, 202, 205 Throughout the DEIR, the proposed development of the Kragen Site is described as including: 175 residential units; 35,000 square feet of ground-floor retail uses, consisting of a 30,000 square-foot food market and 5,000 square feet of other smaller neighborhood-serving retail uses; approximately 4,300 square feet of open space (denoted as the Brighton Street Open Space throughout the DEIR); 281 off-street parking spaces and one-car share space. (see e.g., pp. 13, 99-Table 1 and n.5, and 103) Since the DEIR is intended to be the CEQA documentation for the Kragen Site entitlements, we request that the project be described in terms of permitted maximums for each component. This change would ensure that the DEIR has identified all potential impacts that could occur at the Kragen Site under the proposed NC-T zoning. Thus, the project description should read "up to 175 residential units; up to 35,000 square-feet of ground-floor retail uses, consisting of a food market of up to 30,000 square feet and up to 5,000 square feet of other smaller neighborhood-serving retail uses; approximately 4,300 square feet of open space (denoted as the Brighton Street Open Space throughout the DEIR); and up to 292 off-street parking spaces and one-car share space." Text changes also need to be made to p. 100, item (iii) to revise the incremental changes in development due to the Area Plan at the Kragen Site to "approximately 15 more residential units". *(Farella Braun + Martell LLP. Letter, Comment No. 14)*

Response

Subsequent to submittal of the comment, the project sponsor reduced parking proposed for the Kragen Auto Parts Site.[1] As currently proposed by the project sponsor, the project would provide up to 258 parking spaces (up to 175 residential parking spaces, up to 80 parking spaces for food market, and up to three parking spaces for the other retail). The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces). This change does not affect the conclusions of the DEIR's transportation analysis.

The parking controls in the proposed Ocean Avenue Neighborhood Commercial Transit (NC-T) District, as described in Planning Code Section 151.1, have changed slightly after the DEIR was published, which would result in a change in parking requirements.

The Kragen Auto Parts Site, which is currently in an NC-2 zoning district, would be changed to the NC-T zoning designation as part of the Plan. Under the revised NC-T parking control, Planning Code Section 151.1 states the following: one off-street parking space per 1,500 sq. ft. of occupied space would be permitted for commercial uses, with the exception that grocery stores larger than 20,000 gross sq. ft. would be permitted one off-street parking space for 500 sq. ft. for the first 20,000 sq. ft. and one space per 250 sq. ft. in excess of 20,000 sq. ft. Parking controls for the NC-T district from the Planning Code Section 151.1 is summarized below.

All non-residential uses in NC-T districts except as specified below	For uses in Table 151 [of the Planning Code] that are described as a ratio of occupied floor area, permitted up to 1 space per 1,500 square feet of occupied floor area or the quantity specified in Table 151, whichever is less, and subject to the conditions of Section 151.1(f)
Retail grocery store uses in NC-T districts with over 20,000 square feet of occupied floor area	Permitted up to 1 space per 500 square feet of occupied floor area, and subject to the conditions and criteria of Section 151.1 (f). Conditional use up to 1 space per 250 square feet of occupied floor area for area in excess of 20,000 square feet, subject to the conditions and criteria of Section 151.1(f).

Therefore, the permitted maximum for the Kragen Auto Parts Site would be 175 residential parking spaces, 40 to 80 food market parking spaces (spaces over 40 would be permitted with conditional use authorization), and three spaces for the 5,000 sq. ft. of other retail uses, for a total of 218 to 258 (spaces over 218 permitted with conditional use authorization) parking spaces.

Under Planning Code Section 166, newly constructed buildings must provide car share spaces as follows: 1 space for 50 to 200 residential units, 1 space for 25 to 49 non-residential parking spaces, and 1 space for every 50 non-residential parking spaces over 50 spaces. Thus, if the Kragen Auto Parts site were to provide up to 175 residential units,

[1] Conditional Use Permit Application for 1150 Ocean Avenue (Kragen Auto Parts Site), Case No. 2006.0884C, June 26, 2008, and telephone conversation between Meg Spriggs, Avalon Bay Communities, and Jeanie Poling, MEA, September 24, 2008.

up to 80 food market parking spaces (spaces over 40 permitted with conditional use authorization), and three spaces for the other retail, three car share spaces would need to be provided. The project would exceed the Planning Code Section 166 requirement of three car share spaces by providing five car share spaces.

Number of Residential Units	**Number of Required Car Share Parking Spaces**
50-200	1
Number of Parking Spaces Provided for Non-Residential Uses or in a Non-Accessory Parking Facility	**Number of Required Car Share Parking Spaces**
25-49	1
50 or more	1, plus 1 for every 50 parking spaces over 50

The text in the DEIR has been revised and described below to clarify and provide consistency regarding the description of square footage and number of parking spaces. The text in the DEIR (item number 6 on pp. 12 and 98) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> 6. No minimum amount of parking would be required for new commercial/institutional uses. A maximum of one off-street parking space per 1,500~~500~~ sq. ft. of occupied space would be permitted for commercial uses, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft, and, with conditional use authorization, one space per 250 sq. ft. of occupied space in excess of 20,000 sq. ft.

The text in the DEIR (p. 13, fourth paragraph, second through last sentences) is revised as follows:

> The site is proposed to be developed with ~~approximately~~ up to 175 residential units above ~~approximately~~ up to 35,000-sq.-ft. of ground-floor retail uses. The retail uses would include up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail spaces. The development would also include about 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed at this site. The Kragen Auto Parts Site development would meet the proposed off-street parking standards for the new NC-T District of a maximum of one parking space for each residential unit; therefore, the development ~~would~~could include up to 175 residential parking spaces. The parking standards for new ~~retail~~non-residential uses in an NC-T District would permit a maximum of one space per ~~500~~ 1,500 sq. ft. of occupiable space, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted to have one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 sq. ft. of occupiable space in

excess of 20,000 sq. ft. The development could therefore include a maximum of ~~117~~ 83 parking spaces for the retail uses. As currently proposed, the development at Kragen Auto Parts Site would include a total of up to 258 ~~281~~ off-street parking spaces, including ~~173~~175 spaces for the residential units~~, and 106~~ 80 spaces for the food market, and three spaces for the other retail. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 28) under the heading "Parking Impacts" is revised as follows:

Parking Impacts

The Kragen Auto Parts Site development would have a peak weekday evening parking demand for 227 residential parking spaces and 170 food market/retail parking spaces. This development would meet the current Planning Code requirements for the provision of off-street parking spaces, as well as accessory parking provisions for commercial parking. ~~With the proposed 281 spaces, this development would have a parking shortfall of 116 spaces. With the proposed Planning Code changes as part of the Area Plan, this~~ The development would provide up to a maximum of ~~292~~263 spaces, including 175 residential spaces, ~~nine retail spaces, and~~ up to ~~108~~80 food market spaces, up to three other retail spaces, and five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces). The project would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155. If this amount of parking was supplied, the development would have a parking shortfall of ~~93~~134 spaces. Improvement measures to reduce the effect of the parking shortfall from this site development are included in Chapter V, Mitigation Measures.

This reduction in the parking provided does not alter the conclusions of the EIR regarding parking.

The text in the DEIR (p. 99, Footnote 5) is revised as follows and also reflected in Table 1 edits on p. C&R-9:

[5] Two buildings with residential use above ground-floor retail to be developed on the Kragen Auto Parts Site. Up to ~~About~~ 30,000 sq. ft. of proposed retail would be a food market; the remaining up to 5,000 sq. ft would be other neighborhood-serving retail. Brighton, Harold, and Lee Avenues would be extended north at least for the length of the proposed development. Vehicular access to the residential uses would be from Brighton Avenue ~~and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses

would be from Brighton Avenue, and vehicular egress from the non-residential uses would be onto Lee Avenue.

The text in the DEIR (p. 100, item (iii)) is revised as follows:

Development on the Kragen Auto Parts Site would include approximately 15 more residential units and about 18,355 sq. ft. more of commercial use.

The text in the DEIR (p. 103) is revised as follows:

The Kragen Auto Parts Site is privately owned and it is the largest individual site in the Ocean Avenue Neighborhood Commercial District subarea. The site, currently in an NC-2 zoning district, would be rezoned to the new NC-T zoning designation. The Area Plan identifies the development of up to ~~approximately~~ 175 residential units above up to ~~approximately~~ 35,000-sq.-ft. of ground-floor retail uses. The proposed retail uses would include up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail spaces. (See Figure 10: Proposed Development at Phelan Loop Site and Kragen Auto Parts Site.) The development would also include about 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed on this property.

The Kragen Auto Parts Site development would meet the proposed off-street parking standards for the new NC-T District. A maximum of one parking space would be permitted for each residential unit in the NC-T District; therefore, the development could include a maximum of 175 residential parking spaces. The parking standards for new retail uses in an NC-T District would permit a maximum of one space per 1,500 ~~500~~ sq. ft. of occupiable space, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted to have one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 sq. ft. of occupiable space. The development could therefore include a maximum of ~~117~~83 parking spaces for the retail uses, including the ~~food market.~~[2]

As currently proposed, the Kragen Auto Parts Site development would include up to 263~~a total of 281~~ off-street parking spaces~~,~~ ~~–~~ 175 spaces for the residential units~~, and 106~~83 spaces for the food market and other proposed retail uses, and five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces). The project would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

[2] At an assumed 90 percent efficiency for the proposed new retail uses, the 5,000 sq. ft. of other smaller neighborhood-serving retail spaces could have up to 4,500 sq. ft. of occupiable space, permitting up to three ~~nine~~parking spaces, and the 30,000-sq.-ft. food market could have up to 27,000 sq. ft. of occupiable space, would be permitting up to 64~~108~~ parking spaces.

~~About 11 of the total proposed parking spaces would be handicapped-accessible. The Kragen Auto Parts Site development would also be required to meet the car-share requirements under Planning Code Section 166. Accordingly, the development would provide one car share space.~~

The text in the DEIR (p. 136, second paragraph) is revised as follows:

The Kragen Auto Parts Site would be developed with ~~approximately~~ up to 175 residential units above up to 35,000 sq. ft. of ground-floor retail uses. Retail uses would include up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of small, neighborhood-serving retail uses. The site is currently in the NC-2 zoning district, and would be changed to NC-T. Under the NC-T zoning, up to 258 ~~about 292~~ parking spaces could be provided~~,~~ 175 residential spaces and 83 ~~117~~ retail spaces. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 157, first full paragraph) is revised as follows:

The proposed Area Plan includes a proposal for demolition of the existing auto parts shop and development of the Kragen Auto Parts Site with ~~approximately~~ up to 175 residential units, up to ~~approximately~~ 35,000 sq. ft. of ground-floor retail uses, including up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail space; and approximately 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed on this property.

The text in the DEIR (p. 202) is revised as follows:

The Kragen Auto Parts Site development would be a mixed-use project containing up to 175 residential units, up to a 30,000-sq.-ft.-food market, and up to 5,000 square feet of neighborhood-serving retail uses. Up to ~~Approximately~~ 258~~281~~ off-street parking spaces are proposed to serve the residential and retail uses on the site. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 204, last paragraph) is revised as follows:

With implementation of the Area Plan, the Planning Code parking requirements would be revised to maximum parking allowances (i.e., a maximum of up to one parking space per residential unit could be allowed). For commercial uses, there would be no parking requirements; however, ~~new food markets~~ retail grocery

stores larger than 20,000 gross sq. ft. would be allowed to provide one space per each 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 square feet of occupiable space in excess of 20,000 sq. ft. The proposed changes to the Planning Code would allow a maximum of ~~292~~258 spaces to be provided as part of the Kragen Auto Parts Site development, including 175 residential spaces~~, 9 retail spaces,~~ and up to ~~108~~83 retail ~~food market~~ spaces. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 205) is revised as follows:

The Kragen Auto Parts Site development would have a peak weekday evening parking demand for 227 residential parking spaces and 170 food market/retail parking spaces. As currently proposed, the project sponsor would provide up to 258 ~~281~~ parking spaces: 175 for the residential units, ~~and 106~~ 83 spaces for the food market space and miscellaneous retail. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155. ~~Of these spaces, 11 would be handicapped-accessible.~~

Comment

P. 104 In the 4th bullet on p. 104, please delete the second sentence and replace it with the following text: "The building developed on the western half of the project site will step down as follows. Along Ocean Avenue, the massing on the western side will be reduced from five to four stories as it approaches the west. The fifth floor will be set back 7 feet from Ocean Avenue. At the western property line, the fifth floor will be set back approximately 10 feet. The entire façade above the first floor on the western property line will be set back 7 feet. The resulting design articulates a four-story massing along the western side of the building on the western half of the site that reduces the fifth floor's impact on the adjoining properties, thus minimizing the building's shadows on its western neighbors. The building massing steps down even more as it approaches the northwest corner facing the Westwood Park neighborhood. At this corner, the building terraces from five to four to three stories. This results in the three-story building at the location where it is closest to the adjacent Westwood Park neighborhood. Such massing eliminates any shadows being cast on the adjacent Westwood Park cottages." (*Farella Braun + Martell LLP. Letter, Comment No. 15)*

Response

The text in the DEIR is revised where appropriate to clarify the description of the building at the Kragen Site. The portion of the comment related to the building's shadows on its western neighbors is not included in the DEIR text revision, as it does not relate to

clarifying the project description. As stated on p. 262 of the DEIR, analysis of shadow effects is required for structures that could cause new shadow on open space under the jurisdiction of or designated to be acquired by the Recreation and Park Commission. Shadow effects of the Kragen Auto Parts Site Development is discussed on pp. 267-269.

The text in the DEIR (p. 104, fourth bullet) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

- Under the Area Plan, the maximum building height at the Kragen Auto Parts Site would be 55 feet. ~~The building developed on the west site would be encouraged to step down from 55 feet to 45 feet on its northern side, in order to transition to the existing lower buildings to the northwest and west.~~ The building developed on the western half of the project site would step down as follows: Along Ocean Avenue, the massing on the western side would be reduced from five to four stories as it approaches the west. The fifth floor would be set back seven feet from Ocean Avenue. At the western property line, the fifth floor would be set back approximately 10 feet. The entire façade above the first floor on the western property line would be set back seven feet. The building massing steps down even more as it approaches the northwest corner facing the Westwood Park neighborhood. At this corner, the building terraces from five to four to three stories. Both east and west buildings would be ~~required to be~~ built to the property lines along Brighton, Lee and Ocean Avenues, as well as to the SFPUC easement on the property's western boundary.

Comment

Page 195-207, Phelan Loop Development Sites and Kragen Auto Parts Sites: These two sites are getting, to some degree, project level clearance. The project descriptions for these two projects need to be accompanied by graphics. There is no proposed condition graphics for the Phelan Loop operations for bus access and exit. There is a detailed description for garage access to the Kragen Auto Parts Sites, presumably based on some plans. It would be helpful to the reader/reviewer if these plans are presented as part of the EIR or in the Appendix. (*MTA. Letter, Comment No. 60)*

Response

Figure C&R 1 on p. C&R-21 (revised DEIR Figure 6) shows proposed circulation at the Phelan Loop and Kragen Auto Parts Sites.

Comment

While the Upper Yard is not environmentally cleared in the DEIR, we suggest that there be a more detailed discussion of BART and Muni's efforts to jointly develop the site that provides for accessible connection and transfer between BART and Muni patrons and provides for taxi, carpool, van and shuttle drop-offs. Furthermore, it should also mention the need to provide access by BART Operations. (*BART. Letter, Comment No. 150)*

Response

The DEIR, on p. 105, addresses Upper Yard site development, which would be closely linked to both BART and Muni facilities. The DEIR, on pp. 87-88, also addresses a new termination stop and transit waiting area for the Muni Metro M-line on the Upper Yard. If the M-line terminal remains at Balboa Park, the redevelopment of the Upper Yard site would likely include a rerouting of the M-line to the western edge of the Upper Yard site, to terminate at the BART mezzanine. This would greatly increase transfer convenience between BART and Muni services while allowing for maximum development potential on the Upper Yard site. The existing BART entrance on the south side of Geneva Avenue would be integrated into the overall design of the mixed-use development on the Upper Yard. BART, the Planning Department, MTA, and other city agencies would work together to ensure that the site is developed to assist the transit riders and the transit providers to maximize transit efficiencies.

MTA is considering route changes in the Muni Metro lines as part of the Transit Effectiveness Project. Please refer to the response to Comment No. 152 on p. C&R-82 and Figure C&R 2 on p. C&R-22 which shows the proposed transit reconfiguration.

Comment

Page 105, Tier 1: Near-Term Development (2010). In the bulleted summary of the Upper Yard parcel, please clarify the proposed height for this development. (*BART. Letter, Comment No. 154)*

Response

The text on DEIR p.105 (first bullet) is revised as follows to clarify and correct the proposed height:

> The Upper Yard parcel, jointly owned by Muni and BART, is proposed to be developed with about 200 residential units above 10,000 sq. ft. of ground-floor retail uses, parking, and new entrances to the existing BART station. Active retail space would be provided at the intersection of Geneva and San Jose Avenues and along the majority of the site's Geneva Avenue frontage. The height of the proposed development is expected to range between 40 and ~~80~~85 feet. The height limit of the northern half of the Upper Yard parcel would be reduced from 105 feet to 85 feet and the site of the Geneva Office Building and Powerhouse would be reduced from 105 feet to 40 feet.

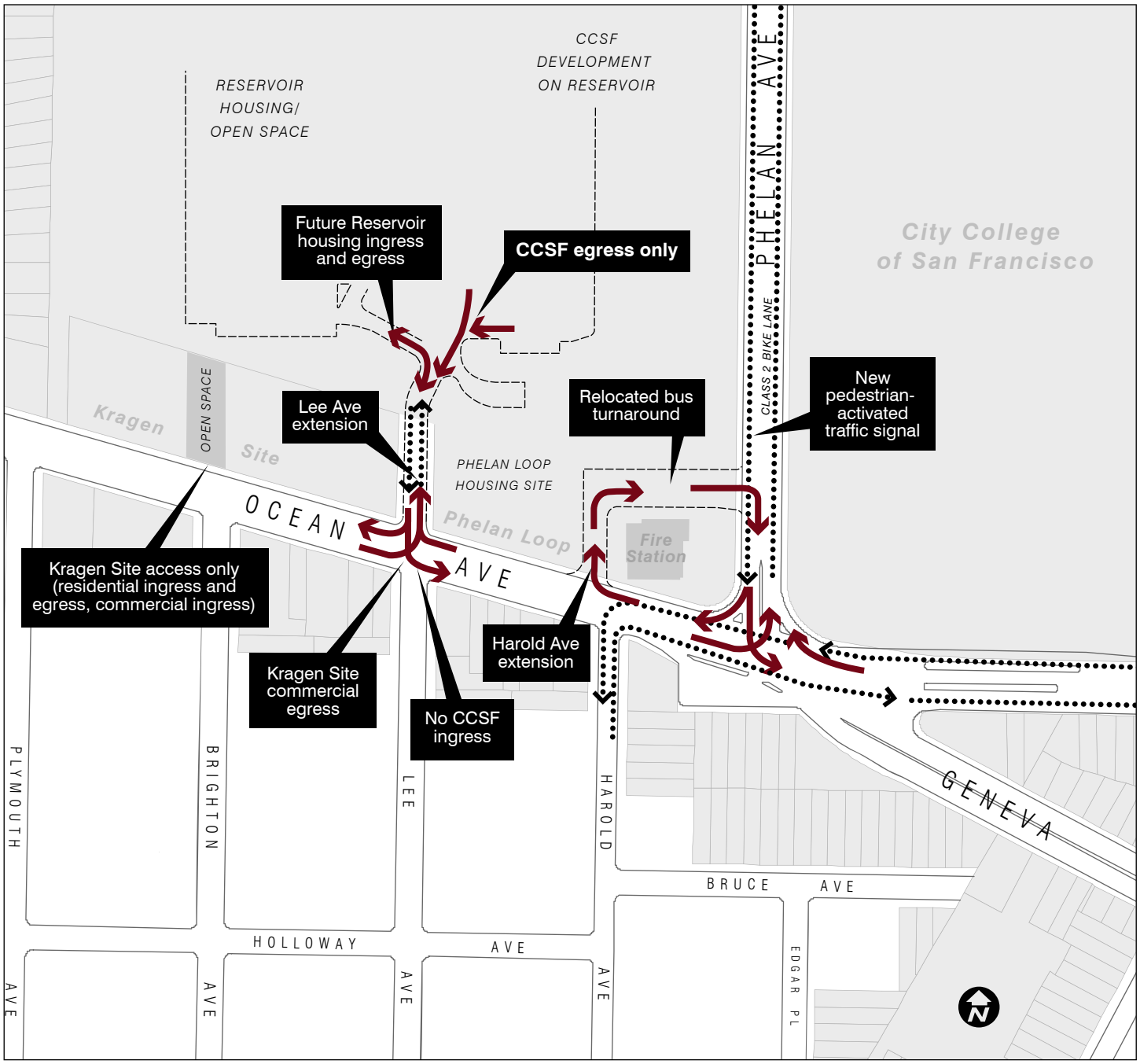

FIGURE C&R 1 **(Revised DEIR Figure 6)**
Proposed Roadway Configuration and Circulation

Source: San Francisco Planning Department

FIGURE C&R 2 (Revised DEIR Figure 5)

Proposed Transit Reconfiguration

Sources: Balboa Park Station Area Plan, San Francisco Planning Department, EDAW, Turnstone Consulting, MTA 2008

3. LAND USE, PLANS, AND POLICIES

Comment

We are surprised and confused that after many meetings where people expressed concerns regarding the height/density/size of this development that somehow, from the Plan to the Environmental Review, changes were made to lessen the open space in the reservoir area by 78% --from 450,000 sq. ft. to 100,000 sq. ft.

(graph p. 48 of the plan)

"Reservoir 1 575 (units) 450,000 sq. ft"

graph p. 99 of the Environmental Review:

"Reservoir 500 (units) 100,000 sq. ft."

How did this "happen"? 100,000 sq. ft. is not sufficient for the size and density of this project (1,000 units of unknown number of occupants plus the commercial units) and already existing housing density in outlying areas (esp. S. and W.) and the presence of the City College and their planned high-density development, add to the necessity of implementing the planned/slated open space of 450,000 sq. ft. (*Ken and Lauren Rychwalski. Letter, Comment No. 88*)

Response

The reservoir site is 25 acres (1,089,000 sf). The table on p. 48 of the 2002 *Public Review Draft Balboa Park Station Area Plan* notes that 220,000 to 450,000 sf (approximately 20 to 40%) of the reservoir could be used as open space. P. 86 of the 2002 *Draft Area Plan* also notes that the specifics of the reservoir's future would be determined through detailed planning processes carried out by City College and the SFPUC, who both own portions of the reservoir. P. 87 of the 2002 *Draft Area Plan* notes that City College will develop 12 acres on the eastern portion of the reservoir, while the western portion may be maintained as a reservoir or developed as housing or open space or some combination thereof. Development of the CCSF portion of the reservoir is addressed in the 2004 *City College Master Plan.*

The DEIR on p. 78 states, "If the SFPUC were to decide that the west basin is not needed for water storage and declare it to be surplus property, the west basin would be used for residential and open space development in the future." Development of the western portion of the reservoir is analyzed in the DEIR as a Tier 2 project, to be developed in 5 to 20 years. While details at this time are unknown, the DEIR analyzes the worst-case scenario in order to capture the range of potential environmental impacts. As cited on the table on p. 99 and in the analysis, the project assumes a maximum residential development of 500 units on the western portion of the reservoir, thus limiting open space to only 100,000 sf. In the event that the units are not built or the number of

residential units developed is reduced, up to 450,000 sf of open space could be created on the reservoir site.

4. POPULATION, HOUSING, AND EMPLOYMENT

Comment

Since we has a presentation on the Balboa Park Station area which is the good plan I think with solid recommendations, I looked just in a cursory way at the EIR, particularly, at the program level effect and on Page 20, either I am not understanding it or there is a severe typo here. I'm going to read the sentence in question. "The project area is expected to gain 4,095 residents by the year 2025 if the proposed area plan as implemented. This would constitute a sixty-five percent gross in project held population compared to the cease based population growth projection of sixty new residents". (sic) Is that supposed to read " 'sixty' percent new residents"? or " 'sixty' new residents"? That is my question. I think it would read sixty percent new residents. (*Commissioner Moore. Commission Hearing 10/25/2007, Comment No. 3)*

Response

The information stated in the DEIR is correct. Under the proposed Area Plan, the project area would gain 4,095 residents by the year 2025. If the proposed Area Plan is not implemented, the population growth projection is estimated to be 60 new residents. The reason for the increase in population is due to changes noted in the Plan. As stated on p. 79 of the DEIR, the Area Plan presents an overall concept for enhancing the existing Project Area as well as encouraging infill development on sites within the Project Area. The Area Plan includes changes to land use policies to encourage mixed-use infill housing, develop new commercial and residential uses, create an active mixed-use neighborhood around the Transit Station, and protect existing housing in the Project Area. The Area Plan also proposes some changes to height and bulk limits creating additional development potential. Population, housing, and employment impacts are discussed in the DEIR on pp. 139-158.

Comment

Inappropriate Scale
Many who were born in Sunnyside have stayed here, attached to this quiet neighborhood which fosters a strong sense of community and which has drawn new residents who are attracted by these same qualities. While change is inevitable, change on the scale described in the DEIR is unnecessary and inappropriate for our part of San Francisco. To ask a neighborhood which already deals with an inordinate amount of traffic due to the presence of City College to take on waves of additional unmitigated traffic as projects are completed and the population explodes is unfair and unacceptable. (*Sunnyside Neighborhood Association. Letter, Comment No. 86)*

Response

The Comments and Responses phase of the EIR process is intended mainly to respond to comments on the adequacy of the approach and analyses in the Draft EIR. The commenter expresses opposition to the scale of the proposed project. The merits of the project and commenter's concerns will be considered by the project decision-makers—the Planning Commission and the Board of Supervisors to assist with their decision of whether or not to approve the proposed project.

5. TRANSPORTATION

Comment

On behalf of the 684 homes in Westwood Park, I want to express my disappointment that, aside from major traffic corridors such as Ocean and San Jose Avenues, the DEIR did not address traffic impact on surrounding neighborhoods. With additional housing being built on the Balboa Reservoir and along Ocean Avenue, business expansion along Ocean Avenue, and City College's expansion, Westwood Park will see a significant increase in traffic and parking *within* our neighborhood. This does not appear to be addressed in the DEIR. Westwood Park already has significant cut-through traffic and parking congestion problems. We have been approved for an area-wide DPT traffic calming program, but there is no money to fund it. The Balboa Park Plan will significantly add to these problems. Our neighborhood is in favor of the project. We believe it can greatly improve the area. However, without the inclusion in the plan for traffic calming, including funding, we cannot support it. *(Westwood Park. Letter, Comment No. 2)*

Response

The Balboa Park Planning Code amendments, along with the Balboa Park Community Improvements Program, which would be enacted as part of the Area Plan, would impose an impact fee on new residential and non-residential development in the project area. The revenue generated from this fee would be used to fund community-identified projects in the Project Area, including the Neighborhood Streetscape Improvements Project. This project encompasses the requested traffic calming study, the construction of residential gateways where main streets intersect with neighborhood streets in the Project Area, and street tree plantings. The scope of the traffic calming study is outlined in the Balboa Park Community Improvements Program, and includes outreach, data collection, participation in community and inter-departmental meetings, development of alternatives, consensus building, and conceptual designs for review by relevant city agencies.

Comment

The DEIR describes the loading spaces proposed on the Lee Avenue extensions as being used by both the Kragen Site and the Phelan Loop Site. (See e.g., pp. 27 and 29). In fact, the 2 loading spaces proposed for the Kragen Site are intended for use only by the large food and other retail operators that will be located on the Kragen Site. To clarify that fact, on pp. 29 and 207, please insert after the sentence “The project proposes…anticipated loading demand” the following text:

"These 2 loading spaces are for the sole use of the large food and other retail operators to be located on the Kragen Site." *(Farella Braun + Martell LLP. Letter, Comment No. 16)*

Response

This comment is acknowledged. The text in the DEIR (p. 29, second paragraph) is revised as follows (new language is double underlined):

> The project proposes two off-street loading spaces and would meet the Planning Code requirements and the anticipated loading demand. These two loading spaces are for the sole use of the grocery store and other retail operators to be located on the Kragen Auto Parts Site.

The text in the DEIR (p. 207, second paragraph) is revised as follows:

> The Kragen Auto Parts Site development's supply of two off-street loading spaces would meet the Planning Code requirements and the anticipated loading demand. These two loading spaces are for the sole use of the grocery store and other retail operators to be located on the Kragen Auto Parts Site.

Comment

PP. 99, 160, 200-201, 205-206, 207 Since the publication of the Area Plan, Avalon Bay has identified a preferred site configuration for vehicular access to the proposed development's retail spaces. Rather than use the Brighton Avenue extension for retail vehicular egress,[3] which is proposed as part of the Area Plan, Avalon Bay proposes that Brighton Avenue be used for retail vehicular ingress and that Lee Avenue be used for retail vehicular egress. Exhibit A shows how the proposed revision would work. See Figure 8 of the "Balboa Park Area Plan Transportation Study: Final Report", December 19, 2006. This modification to circulation would relieve Brighton of retail vehicular egress traffic and eliminate queuing along Brighton, enhancing pedestrian access to the Brighton Open Space and creating a more pedestrian-oriented environment. We request that this reconfiguration of site access and its traffic impacts be analyzed so that it can be included in the Final EIR. The text and impact analysis should be included in FEIR sections on project description, setting, impact and mitigation and improvement measures, as applicable. *(Farella Braun + Martell LLP. Letter, Comment No. 17)*

Response

The proposed reconfiguration of the vehicular access for the Kragen Auto Parts Site was evaluated and compared to the configuration evaluated in the DEIR. Specifically, each configuration's effect on intersection level of service and queuing under Existing plus Kragen conditions was examined.

[3] See p. 205 in the DEIR for a description of the proposed garage access.

In general, the level of service evaluation showed no new impacts as a result of the reconfigured vehicular access. In both cases, the southbound approaches to the Ocean/Brighton and the Ocean/Lee intersections would operate at LOS D or better. Under the Brighton Avenue ingress/Lee Avenue egress configuration, average intersection delay at the Ocean/Brighton intersection would increase slightly, but delay specifically at the southbound approach to the intersection would decrease. At the Ocean/Lee intersection, average intersection delay would decrease slightly, and delay specifically at the southbound approach to the intersection would increase slightly.

Under the original configuration, 95th percentile queuing[4] along Brighton Avenue would be expected to reach capacity, while Lee Avenue would be underutilized by comparison. Under the alternate configuration the queuing would be dispersed more evenly between Brighton Avenue and Lee Avenue, with 95th percentile queuing remaining below the available storage length. However, it is worth noting that should egress from the City College of San Francisco (CCSF) become available on Lee Avenue, queuing can be expected to extend beyond the Kragen Auto Parts Site driveway if the Ocean Avenue/Lee Avenue signal phasing is not modified. The effects of queuing by CCSF traffic on southbound Lee Avenue are assessed in greater detail in Response No. 89 on p. C&R-54.

The text of the DEIR, on p. 99, Table 1, Footnote 5, is revised as follows:

> Vehicular access to the residential uses would be from Brighton Avenue ~~and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses would be from Brighton Avenue and vehicular egress from the non-residential uses would be onto Lee Avenue.

Comment

PP. 45, 329 The DEIR proposes a specific mitigation measure for the Kragen Site's traffic impacts. The measure will adjust the signal timing for the existing Ocean Avenue/Brighton Avenue intersection (on the south side of Ocean) to provide a short protected left-turn green phase for westbound traffic. The text should be revised to include a description of why this mitigation measure is being proposed: "According to the Final Transportation Study, this measure 'would allow any left-turn queues [on Brighton] to clear the intersection.' Transportation Study, p. 79." This makes clear that there is not a new signal being required at the Brighton Avenue extension on the north side of Ocean Avenue, but merely an adjustment to the signalization timing at the existing signal on the south side of Ocean at the Ocean/Brighton Avenues intersection. *(Farella Braun + Martell LLP. Letter, Comment No. 18)*

[4] 95th percentile queuing is the length of queue that has a probability of five percent or less of being exceeded during a peak hour. As a result, it provides a worst case scenario for queuing.

Response

Comment noted. As discussed on pp. 49 and 329 of the DEIR, the purpose of the proposed left-turn phase is to ensure that westbound left-turning vehicles waiting for a large enough gap in traffic would be able to maneuver, allowing any queuing associated with these westbound left turns to be cleared. In general, growth in traffic levels along Ocean Avenue as a result of the proposed project and other projects in the area would limit the number of gaps in traffic available for left-turning vehicles.

Comment

PP. 45, 329 This mitigation measure requires Avalon Bay to work with MTA and the Planning Department to confirm "that this signal change is acceptable". See p. 329, 1st bullet. In this context, "acceptable" can reasonably be interpreted to mean "satisfactory and able to agreed to or approved of". If MTA has discretion whether or not to "accept" this measure, then it is not feasible under CEQA. A mitigation measure is feasible "when it can be accomplished…within a reasonable period of time…" CEQA Guidelines § 15364. Formulation of a mitigation measure cannot be deferred. CEQA Guidelines § 15126.4(a)(1)(b).

PP. 45, 329 These CEQA Guidelines require that this mitigation measure be implemented without the qualification of waiting to see if it is "acceptable to MTA or the Planning Department". Please revise this mitigation measure to read: "signalization shall meet applicable City standards and specifications." Otherwise, there is a possibility that the City may find that this measure may not be feasible for the intended purpose and there would need to be a later-developed mitigation measure. Since CEQA does not allow deferral of formulation of mitigation measures, the text should be revised as suggested. (*Farella Braun + Martell LLP. Letter, Comment No. 19)*

Response

The mitigation measure requires a change in the signalization at the Ocean/Brighton intersection to accommodate the Kragen Auto Parts Site development. The mitigation measure on p. 329 of the DEIR is revised to indicate that at a minimum the signalization changes at the Ocean Avenue/Brighton Avenue intersection would meet applicable City standards and specifications.

The text in the DEIR (pp. 45 and 329, second bullet) is revised as follows:

> The project sponsor for the Kragen Auto Parts Site development would work with MTA and the Planning Department to ~~confirm that this signal change would be acceptable~~adjust the signalization at the Ocean/Brighton intersection to accommodate the Kragen Auto Parts Site development. The change in signalization shall meet City standards and specifications.

This change does not alter the conclusions of the EIR nor constitute new information regarding significant impacts.

Comment

P. 341 We have discussed above that the 2 loading spaces for the Kragen Site would be located along Lee Avenue and used only by the large food and other retail operators on the Kragen Site. See e.g., pp. 29, 55, 177, 207. (*Farella Braun + Martell LLP. Letter, Comment No. 29)*

Response

Please see the response to Comment No. 16 on p. C&R-26.

Comment

P. 340 To be sure that the trucks that are intended to be making deliveries and pickups at the Kragen Site's food and retail uses are not precluded from using these loading spaces, the first bullet at p. 340 should be deleted ad replaced with the following text: "Fifty-foot trucks are permitted as long as the other measures below are met." We are recommending this change because large retail food operators uniformly require trucks of 50 feet in length. The 2nd bullet at p. 340 should be revised to read: "All Kragen Site retail operators which use these loading spaces will use their best good faith efforts to restrict deliveries from trucks exceeding 50 feet in length to the period after 7 PM." We are recommending this change because of the Kragen Site's predominant residential use; requiring deliveries before 7 AM is not feasible since such activity would disturb the residents' peace and quiet. This improvement measure should thus be limited so that the large food and retail operators need only use their best good faith efforts to have deliveries occur after 7 PM. (*Farella Braun + Martell LLP. Letter, Comment No. 30)*

Response

Truck turning templates for both 30-foot and 65-foot trucks are included in the appendix of the December 2006 *Balboa Park Station Area Plan Transportation Study*. As shown in those templates, 30-foot trucks would be able to maneuver into the loading areas without interrupting normal traffic conditions. The 65-foot trucks, on the other hand, would be unable to make a westbound right turn from Ocean Avenue without doing so from the center lane or requiring multiple turns, which would result in potential impacts to both traffic and transit operations. When possible, shorter trucks should be used. However, Project land uses such as supermarkets require the use of long trucks. Thus, the improvement measures listed on p. 340 of the DEIR would need to be implemented to minimize traffic or transit conflicts.

Comment

Figures 1 and 2: These figures are not legible due to their small scale and fuzziness. Each one of these figures can be made more legible by splitting them in two facing pages and improving the contrast in the print.

Figure 6: This figure is to represent the existing condition on how MUNI buses access the bus yard at the end of the bus lines 49 and 9. The figure is faded and not legible.

Figure 10: This figure is not legible. *(MTA. Letter, Comment No. 31)*

Response

Figures 1, 2, and 10 have been reproduced in this C&R as Attachment 3 to improve legibility in print format. Figure 6 has been revised as Figure C&R 1 on p. C&R-21 to provide a clearer depiction of the proposed circulation along Ocean Avenue and Phelan Avenue and the Phelan Loop bus turnaround.

Comment

Page 159, Street Network Changes: The street network improvements proposed in this section are analyzed as part of the EIR. There are no detailed descriptions of these proposals or drawings indication the difference between existing and proposed conditions and therefore they are difficult to follow for the reader. It would be helpful if there is a drawing included for each proposal, to the extent available, in the text or Appendix of the EIR. More detailed description in other parts of the EIR should be cross-referenced. The actual changes need to be noted in more detail. *(MTA. Letter, Comment No. 32)*

Response

All street network changes described in the Balboa Park DEIR were taken from the Balboa Park Station Area Plan. Figure 11 on p. 165 of the DEIR presents the existing transit network in the Project Area, and Figure C&R 1 (revised Figure 6) on p. C&R-21 illustrates proposed circulation along Ocean Avenue near the Kragen Auto Parts and Phelan Loop Sites and the Ocean/Phelan/Geneva intersection.

Comment

Pedestrian impact: BART 2005 ridership at the Balboa Park station indicates about 40,000 entry and exits on a daily basis. This number is supposed to grow with or without the project due to other development in the area such as the City College. The proposed project is expected to add about 3,800 pm peak trips to the area including vehicular, transit, and other trips. The developments in the area would have option of providing no parking which cold shift a large number of vehicular trips to transit trips. Considering the potential added number of trips to BART, it is not clear if the pedestrian impact at BART exits could be considered not significant, particularly on Geneva Avenue where the bus stops and BART entries are at close proximity. If the pedestrian improvements proposed as part of the plan are to address this particular issue, they need to be discussed in more detail under the 2025 pedestrian impacts. *(MTA. Letter, Comment No. 33)*

Response

Project-generated trips on transit are expected to be spread throughout the day and include trips to and from work, school, shopping, and other destinations. During the weekday PM peak hour specifically, approximately 61 percent of the project-generated

trips are expected to be inbound to the Project Area and 39 percent of the project-generated trips are expected to be outbound from the Project Area. These transit trips are expected to use all the various Muni streetcar and bus lines in the area, as well as BART, to different locations throughout the City of San Francisco and beyond. In addition, these transit riders can be expected to access public transportation from numerous locations throughout the Project Area – though it is worth noting that residents in the western portion of the Project Area may ride Muni to reach the BART station. Thus, the overall effect of Project-generated transit trips would not necessarily be focused at one specific transit access location and instead would be spread throughout different times, locations, and lines.

The Balboa Park Station Area Plan calls for pedestrian improvements at intersections throughout the Project Area to address existing deficiencies and to accommodate the expected growth in pedestrian volumes associated with the proposed project, as well as other buildout in the area. The majority of these improvements would be focused on the routes that lead to and from the major transit stops and other key locations.

For the reasons stated above, the DEIR on p. 191 correctly concludes that under the Area Plan, conditions for pedestrians would not change substantially over existing and 2025 baseline scenarios.

Comment

Page 159, 5th bullet: Did the traffic analysis for Phelan Avenue between Ocean and Judson Avenues consider the traffic impacts of the removal of the two center travel lanes? We are concerned that the traffic analysis considered Phelan/Ocean/Geneva as two separate intersections when this should have been considered one intersection for traffic analysis purposes. *(MTA. Letter, Comment No. 34)*

Response

Adjustments to lane geometry at study intersections were accounted for in the cumulative analysis along Phelan Avenue. In general, it was found that queuing lengths along the southbound approach to the Ocean/Phelan/Geneva intersection could increase as a result of the lane removals; however, overall operations at this approach would be unlikely to change substantially.

The Ocean/Phelan/Geneva intersection was analyzed as two separate intersections in order to remain consistent with previous studies in the area, such as the *City College Master Plan EIR*. In general, due to the intersection's complicated geometry and signal phasing, splitting the intersection into two separate intersections allows movements to experience the proper amount of green time and face the proper number of conflicting movements. The results of the two analyses were combined to develop an overall aggregate estimate of intersection operating conditions.

Comment

Note- MTA has a somewhat different proposal for redesigning Phelan Avenue. The MTA Phelan Avenue redesign would remove one southbound lane on Phelan Avenue between Judson Avenue and a point approximately 100 feet north of Ocean Avenue. The MTA proposal also includes a new signal at the intersection of Phelan Avenue with South Cloud Circle and a new bus exit from the Phelan Loop bus terminal, a new traffic signal at North Cloud Circle/Lee Avenue and reconfiguration of the existing signal at the Phelan parking lot entrance (signal to be converted to pedestrian signal crossing only for new CCSF campus development in reservoir with a new parking lot entrance farther to the north). (*MTA. Letter, Comment No. 35)*

Response

Comment noted. Please see the response to Comment No. 75 on p. C&R-47.

Comment

Page 159, 6th bullet: Please provide more detail and a scaled diagram of the proposed reconfiguration of the intersection of Ocean/Phelan/Geneva. Any proposed configuration should consider impacts to turning movements by Muni buses and delivery trucks and vehicle queuing in the right lane from westbound Ocean Avenue to northbound Phelan Avenue. (*MTA. Letter, Comment No. 36)*

Response

Figure C&R 1 (Revised Figure 6) on p. C&R-21 illustrates the proposed circulation at the Ocean/Phelan/Geneva intersection. The discussion of impacts on this intersection on p. 181 of the DEIR takes into consideration queuing by drivers turning right onto Phelan Avenue from Ocean Avenue and the maneuvers of large trucks. As detailed plans for the intersection are developed, the designs and geometries would be reviewed and approved by the appropriate City agencies and reflect the turning radii and clearance needs of all types of users.

Comment

Page 165, Figure 11. Please check current Muni System Map for updated routes. *(MTA. Letter, Comment No. 37)*

Response

The Muni routes shown in Figure 11 represent the transit network that was available at the time the Transportation Study was completed and was the basis for the Existing Conditions in the report. Since that time, Muni has updated its routes, including the 9X/AX/BX-Bayshore Express and the T-Third Street. The impacts of these changes were incorporated into the future cumulative analyses.

Comment

Page 166, 3rd paragraph: Please note that the 29-Sunset connects the Project Area with the Sunset and Richmond Districts and is a key west-east cross-town route, with high ridership of students to SF State University and City College of San Francisco. *(MTA. Letter, Comment No. 38)*

Response

Comment noted. The 29-Sunset runs from 5:15 AM to 1:45 AM, with a frequency of service of 10 minutes during the day. This is primarily a cross-town route, connecting major destinations like the Bayview, Balboa Park, City College, San Francisco State University, the Sunset, the Richmond, and the Presidio.

Comment

Page 169, 2nd paragraph: Use a more precise measure than "high" and "relatively low" to describe pedestrian volumes. In parentheses after high and relatively low, provide pedestrian counts (at key intersections provide pedestrian crossings per peak hours, 7-9 AM, 11-1 PM, 4-6 PM) and relative comparison to downtown and other city neighborhoods. Describe key pedestrian/student walking routes between Muni stops on Ocean, Geneva and Phelan Avenues and City College campus. *(MTA. Letter, Comment No. 39)*

Response

Pedestrian volumes along the Ocean Avenue commercial district, Balboa Park Station, and adjacent to CCSF are generally much lower than pedestrian volumes in areas like downtown San Francisco, but higher than in largely residential neighborhoods. Along the Ocean Avenue commercial district, the number of pedestrian crossings typically ranges from 200 to 400 during the weekday PM peak hour, with the highest number occurring near Muni stops. At the Balboa Park Station, the number of pedestrian crossings can range from 300 to 500 during the weekday PM peak hour at adjacent intersections on San Jose Avenue. Adjacent to CCSF, the number of pedestrian crossings is typically less than 200 during the weekday PM peak hour. During morning and midday periods, CCSF pedestrian volumes can be much higher. However, as the analysis of Project impacts focuses on the weekday PM peak hour, observations of CCSF pedestrian activity earlier in the day were not recorded. Additional information regarding the current pedestrian activity associated with CCSF was recently documented in its *City College of San Francisco Master Plan EIR*.

Comment

Page 169, 3rd paragraph: Please describe locations within the project area where there are sidewalk gaps and a need for or plans for ADA curb ramp upgrades by DPW. The report should mention the pedestrian bridge over I-280 connecting Balboa Park with Havelock Street, an important access route for students walking to the east side of campus. Please note that there is no sidewalk on the south side of Havelock Street between the pedestrian bridge and West Road. This forces students who walk to campus on the south side of the pedestrian bridge to cross Havelock

Street at a blinding curve just west of Circular Avenue and Havelock Street in order to use the sidewalk on the north side of Havelock Street. Also, there is no sidewalk on the north side of Havelock Street between Edna Street and West Road, forcing pedestrians to walk in the street. *(MTA. Letter, Comment No. 40)*

Response

In general, sidewalks are provided on nearly all streets and crosswalks are provided at most of the intersections within the Project Area. The pedestrian bridge provided over I-280 connecting Balboa Park with Havelock Street is a commonly used route by CCSF students traveling to and from campus. Currently, no sidewalk is provided on the south side of Havelock Street between the pedestrian bridge and West Road, requiring students to cross Havelock Street at a location that lacks any form of traffic control or crosswalk. Pedestrian volumes are generally high along the Ocean Avenue commercial district (generally between 200 and 300 crossings), near the Balboa Park BART/Muni station (generally between 350 and 450 crossings), and adjacent to CCSF (approximately 200 crossings). In these locations, pedestrian volumes peak during the morning and evening commute periods, but are also high during middays and are affected by the CCSF class schedules. Pedestrian volumes along the residential streets are relatively low throughout the day (generally below 100 crossings).

Comment

Page 169, 3rd paragraph: We suggest less confusing language describing pedestrian crossing prohibitions: "including crossing Ocean Avenue at the Ocean Avenue/I-280 Northbound (NB) on-ramp intersection, crossing Geneva Avenue, at the Geneva Avenue/I-280 SB Ramps intersection on the east side of the intersection and crossing Geneva Avenue at the Geneva Avenue/I-280 NB Ramps intersection on the west side of the intersection."

Also consider changing the second-to-the-last sentence to read: "Similarly, it is difficult for pedestrians to cross in front of the I-280 SB Off-Ramp at Ocean Avenue as this is an uncontrolled movement for vehicles exiting the freeway and merging into Ocean Avenue westbound traffic."

Page 165, Figure 11: Please add Bright and Ramsell Streets, which are missing in the map. *(MTA. Letter, Comment No. 41)*

Response

To clarify pedestrian conditions at the Ocean//Phelan/Geneva Avenue area, the text in the DEIR (p. 169, third through fifth sentences in the third paragraph) is revised as follows (new language is <u>double underlined</u>, while deleted text is shown in ~~strikethrough~~):

> In this area, pedestrians are prohibited from crossing <u>Ocean Avenue</u> ~~intersections at certain locations, including the north-south crossing~~ at the Ocean Avenue/I-280 Northbound (NB) On-Ramp intersection, ~~north-south~~ crossing <u>Geneva</u>

Avenue along the east side ern edge of the Geneva Avenue/I-280 Southbound (SB) Ramps intersection, and the north-south crossing Geneva Avenue along the west side ern edge of the Geneva Avenue/I-280 NB Ramps intersection. Also, the intersection of Ocean/Phelan/Geneva can be difficult to cross, due to free-flow right-turn pockets. Similarly, crossing in front of the I-280 SB Off-Ramp at Ocean Avenue can be difficult for pedestrians, as this is an uncontrolled movement for vehicles exiting the freeway and merging into Ocean Avenue westbound trafficwhich makes crossing in front of this intersection difficult.

Though Bright Street and Ramsell Street are shown on Figure 11, they have not been labeled. As they are not within the DEIR study area and would not affect the conclusions of the DEIR, Figure 11 has not been revised.

Comment

Page 170, 1st paragraph: There should be a description of the type of existing bicycle facilities for each bicycle route listed (i.e. – do bicycle lanes exist, or wide curb lanes, or just standard shared lanes?) The text describes Alemany Boulevard as being a "wide-curb-lane" bicycle route – this in particular should be updated since Alemany Boulevard now has bicycle lanes between Rousseau Street in the north and San Jose Avenue in the south. *(MTA. Letter, Comment No. 42)*

Response

The bicycle facilities described in the DEIR represent the existing conditions at the time the transportation study was conducted. Since the time the transportation study was finalized and the DEIR was prepared, the bicycle facilities on Alemany Boulevard have been upgraded to full Class II bicycle lanes (striped, on-street) between Rousseau Street and San Jose Avenue.

The text in the DEIR (p. 170, first paragraph) is revised as follows (new language is double underlined):

> Bicycle routes in the Project Area are designated on Ocean Avenue (Route 90 west of Phelan Avenue, Route 84 east of Phelan Avenue), Geneva Avenue (Route 90), Phelan Avenue (Route 770), and Alemany Boulevard (Route 45). Wide-curb-lane bicycle routes are available on various streets in the vicinity of the project site such as Holloway Avenue (Route 90), and Alemany Boulevard (Route 45). The bicycle facilities on Alemany Boulevard have recently been upgraded to full Class II bicycle lanes (striped, on-street) between Rousseau Street and San Jose Avenue.

Comment

Page 175, Table 8: Please correct misalignment of subtotal numbers in columns. *(MTA. Letter, Comment No. 43)*

Response

The subtotal row in Table 8 of the DEIR has been realigned below. No change has been made to the content of the table.

DEIR Table 8: Weekday Evening Parking Demand

Area of Development/Land Use	Project Parking Demand			
	Short-Term Commercial	Long-Term Commercial	Resident (Long-Term)	Total
Kragen, Phelan, Reservoir, Garage, and Firehouse:				
Residential	----	----	1,085	1,085
Retail	156	59	----	215
Supermarket	130	17	----	147
Subtotal	**286**	**76**	**1,085**	**1,447**
Ocean Avenue Infill:				
Residential	----	----	605	605
Retail	132	50	----	182
Subtotal	**132**	**50**	**605**	**787**
San Jose Avenue Infill:				
Residential	----	----	624	624
Retail/Other	106	40	----	146
Subtotal	**106**	**40**	**624**	**770**
Total	**524**	**166**	**2,314**	**3,004**

Source: SF Guidelines, Korve Engineering, 2006.

Comment

Page 180, 2nd bullet: Please note that this bike lane proposal differs from the MTA bike lane proposal for Phelan Avenue. *(MTA. Letter, Comment No. 44)*

Response

Comment noted. The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

Comment

Page 180, 1st and 2nd bullets: The 1st bullet states that bicycle lanes would be added to Ocean Avenue and Phelan Avenue. The 2nd bullet describes that travel lanes would be removed on Phelan to add bike lanes, but there is no discussion about what would change on Ocean Avenue to allow bicycle lanes to be added – is parking removal proposed, or is a travel lane proposal proposed? Existing and proposed cross sections of Ocean Avenue should be provided. If travel lanes need to be removed on Ocean Avenue to add bicycle lanes (which we believe they do), is

this captured in the LOS calculations for the "2025 with Area Plan" condition, or in the section describing impacts to transit? *(MTA. Letter, Comment No. 45)*

Response

Ocean Avenue between San Jose Avenue and I-280 currently has four drive lanes, with parking on the north side and dedicated transit lanes in the center. As discussed on p. 193 of the DEIR, the Area Plan proposes to remove a westbound travel lane to accommodate bike lanes on both sides of Ocean Avenue between San Jose Avenue and I-280. Table 11 (DEIR p. 179) addresses removal of travel lanes in the LOS calculations for the 2025 with Area Plan. Overall, the change in capacity along Ocean Avenue would not affect conditions of the major intersections along the street, as the delay at this intersection would be driven by increased traffic volumes. The proposed cross sections are shown on p. 37 in the *Balboa Park Station Area Plan*.

The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

Comment

Page 180, 3rd bullet: Provide a diagram of this intersection reconfiguration and clarify who would pay for it. *(MTA. Letter, Comment No. 46)*

Response

Figure C&R 1 (Revised Figure 6) on p. C&R-21 illustrates the proposed improvements to the Ocean/Phelan/Geneva intersection. As detailed plans for the intersection are developed, the designs and geometries would be reviewed and approved by the appropriate City agencies and reflect the turning radii and clearance needs of all types of users. The revenue sources outlined in the Balboa Park Community Improvements Program, including the implementation of the Plan's proposed impact fee, would help fund the reconfiguration of the Ocean/Phelan/Geneva intersection. Other possible revenue sources include public grants, dedicated funding, and benefit districts.

Comment

Page 181, 1st paragraph: As stated earlier, please note that the proposed reconfiguration of the Ocean/Geneva/Phelan Avenue intersection, including channelizing turning movements, narrowing corner geometry or removing free flow right turn pockets and adding corner bulb-outs, must carefully consider impacts to queuing by drivers turning right onto Phelan Avenue from Ocean Avenue and the turning movement requirements of large truck deliveries (grocery and campus deliveries) and Muni buses. Please cite who would pay for proposed reconfiguration. *(MTA. Letter, Comment No. 47)*

Response

The discussion of impacts on this intersection (DEIR p. 181) takes into consideration queuing by drivers turning right onto Phelan Avenue from Ocean Avenue and the turning of large trucks. Please see the response to Comment No. 46, above, regarding revenue sources.

Comment

Page 183, 1st paragraph: Please add that the Lee Avenue Connection to CCSF Variant (Ocean Avenue to Phelan Avenue) would include Class II bicycle lanes in both directions along the length of Lee Avenue, which is proposed to be 34 feet wide, curb-to-curb. At a meeting on May 25, 2007 CCSF, their consultants (Fehr & Peers, RHAA and BKF) and MTA agreed that the 34 foot wide north-south section of Lee Avenue would include 5 foot bicycle lanes and 12 foot vehicle lanes for both directions. (5'-12'-12'5') *(MTA. Letter, Comment No. 48)*

Response

Comment noted. Please see the response to Comment Nos. 89 and 91 on p. C&R-53 and C&R-60 regarding CCSF egress via the Lee Avenue extension. To accommodate two southbound travel lanes, the roadway would need to be wider than 34 feet.

The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

The east-west section of Lee Avenue alongside Riordan High School is proposed to be 44 feet wide, curb-to-curb, accommodate Class II bicycle lanes and center turn lane. *(MTA. Letter, Comment No. 49)*

Response

The comment is noted. The proposed design of this portion of Lee Avenue is not part of the *Balboa Park Station Area Plan* and is not analyzed in the EIR.

Comment

Page 186, 1st paragraph: Please provide analysis or clarify why the 29-Sunset and 43-Masonic bus routes are not included in the Transit Impacts analysis. The 29-Sunset is used by students commuting to City College from the Sunset District and south east neighborhoods and the 43-Masonic connects northern city neighborhoods of San Francisco to City College. *(MTA. Letter, Comment No. 50)*

Response

Based on preliminary analyses using output from the San Francisco County Transportation Authority's travel demand model, it was determined that the majority of

Project transit trips – approximately 65 percent – would travel to and from downtown San Francisco during peak hours. While the project would affect transit capacity of the 29-Sunset and 43-Masonic lines, these lines would generally have lower ridership totals, and the addition of project trips would be unlikely to result in a significant impact on Muni operations. To provide a conservative analysis of project transit impacts, the analysis of Project transit trips were focused on the routes where project-generated trips are likely to be high – the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines, which serve the Balboa Park Station Area and Downtown San Francisco. Therefore, impacts on the 29-Sunset and 43-Masonic bus routes would be less than significant.

Comment

Page 186, 3rd paragraph: The discussion should include impacts to transit associated with removing travel lanes on Ocean Avenue to add bicycle lanes, per comment above. *(MTA. Letter, Comment No. 51)*

Response

As noted on pp. 44 and 328 of the DEIR, should the planned lane removal on Ocean Avenue occur, vehicular delay can be expected to worsen. Though such a lane removal would not affect bus maneuvering, the increased vehicular delay may affect the ability of Muni lines to run on time and stay on schedule. This impact is described in greater detail on p. 193 of the DEIR.

Comment

Page 189, 1st paragraph: correct misspelling; "though-right lane." *(MTA. Letter, Comment No. 52)*

Response

The text in the DEIR (p. 189, first paragraph) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> Implementation of the transit-only lane would necessitate the elimination of one northbound travel lane and the conversion of the northbound approach to the Ocean Avenue/San Jose Avenue intersection from a left-through lane and a through ~~though~~-right lane to a left-turn only lane and a through-right lane.

Comment

Page 192, 1st paragraph: The proposed elimination of the channelized right-turn pockets for southbound and westbound traffic and adding corner sidewalk bulbs at this intersection would need to be designed, analyzed, reviewed and implemented by MTA. Preliminary analysis of these proposals indicates that the addition of corner bulb-outs at the northeast and northwest corners of Ocean and Phelan Avenues are not feasible due to truck delivery and Muni bus turning requirements. The elimination of channelized right-turn pockets may not be feasible due to the

resulting queuing, (especially during peak student commute times) that would occur as through movement vehicles become backed up behind right turning vehicles on Ocean and Phelan Avenues. *(MTA. Letter, Comment No. 53)*

Response

The discussion of impacts on this intersection on p. 181 of the DEIR takes into consideration queuing by drivers turning right onto Phelan Avenue from Ocean Avenue and the maneuvers of large trucks. Concept designs for the proposed reconfiguration of the intersection were prepared as part of the Balboa Park Station Area Plan process. As detailed plans are developed, the designs and geometries would be reviewed and approved by the appropriate City agencies. Please also see the response to Comment No. 89 on p. C&R-54.

Comment

Page 192, 1st bullet: There needs to be description of what would change on Ocean Avenue (i.e. – travel lane removal in both directions) in order to add bicycle lanes, similar to the description in the 2nd bullet for Phelan Avenue. *(MTA. Letter, Comment No. 54)*

Response

The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

Page 192, 2nd bullet: This bullet should be corrected or clarified. The MTA Phelan Avenue plan would reconfigure Phelan Avenue between Judson and Ocean Avenues to eliminate only one center travel lane in the southbound direction, maintain two travel lanes in the northbound direction, left turn pockets for South Cloud Circle and Lee Avenue and establish Class II bicycle lanes in both directions. *(MTA. Letter, Comment No. 55)*

Response

Comment noted. Lane removal along Phelan Avenue to accommodate bicycle lanes is a project being evaluated in the *San Francisco Bicycle Plan EIR*, currently being prepared by MTA. The *San Francisco Bicycle Plan EIR* will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

Page 193, 1st paragraph: All instances of “Bicycle Master Plan” should be replaced with “San Francisco Bicycle Plan.” *(MTA. Letter, Comment No. 56)*

Response

This comment is acknowledged. The text in the DEIR (p. 193, first paragraph) is revised as follows to acknowledge the correct title and to reflect the status of the bicycle plan in relation to the *Balboa Park Station Area Plan* (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> These new bicycle lanes would enhance bicycle conditions by helping close the gaps in the current bicycle network and by providing key connections to CCSF and transit nodes in the Project Area. The *Balboa Park Station Area Plan EIR* fully evaluates the potential environmental impacts of these bicycle proposals in the context of the Area Plan itself but does not evaluate these bicycle proposals in the cumulative citywide context of the *San Francisco Bicycle ~~Master~~ Plan EIR*. The bicycle proposals in the Area Plan are not consistent with the bicycle proposals for these streets in the *Citywide Bicycle Master Plan*. For these reasons, unless the pending *San Francisco Bicycle ~~Master~~ Plan EIR* evaluates the bicycle proposals in the *Balboa Park Station Area Plan* in a citywide cumulative context, the bicycle proposals in the Area Plan could not be implemented in accordance with a judicial determination that overturned prior environmental review of the *Bicycle Master Plan*. The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

Page 193, 1st paragraph: There is a sentence that reads "The bicycle proposals in the Area Plan are not consistent with the bicycle proposals for these streets in the citywide Bicycle Master Plan." The EIR should note that the bicycle proposals in the Area Plan are consistent with the San Francisco Bicycle Plan. *(MTA. Letter, Comment No. 57)*

Response

At the time the transportation study for the DEIR was conducted, the bicycle elements as proposed in the Area Plan were inconsistent with the *Citywide Bicycle Master Plan*. However, the *San Francisco Bicycle Plan EIR*, currently being prepared, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

Comment

Page 193, 2nd paragraph: How many lanes of traffic would be provided on the Phelan Avenue approach to the Geneva/Ocean/Phelan intersection under this proposal? *(MTA. Letter, Comment No. 58)*

Response

Figure C&R-1 on p. C&R-21 illustrates the proposed configuration at the Geneva/Ocean/Phelan intersection. Under the modifications proposed in the Area Plan, the travel lane removal along Phelan Avenue would not extend to the Ocean/Phelan/Geneva intersection. Specifically at the southbound approach to the intersection, only the channelized right-turn lane would be removed. The southbound approach would continue to provide one shared through-left-turn lane, and one shared through-right-turn lane. Lane removal along Phelan Avenue to accommodate bicycle lanes is a project being evaluated in the *San Francisco Bicycle Plan EIR*, currently being prepared by MTA. The *San Francisco Bicycle Plan EIR* will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

Page 193, 3rd paragraph: This paragraph describes a westbound travel lane removal on Ocean Avenue to add bicycle lanes – this is inconsistent with descriptions provided elsewhere in the document, which don't discuss travel lane reductions on Ocean Avenue. Was a travel lane reduction on Ocean Avenue modeled in the intersection analysis or considered for impacts to transit? Also, the proposal to remove a travel lane in the westbound direction but NOT in the eastbound direction is inconsistent with what MTA thinks would need to change on Ocean Avenue in order to add bicycle lanes (i.e. – travel lane removal in both directions). *(MTA. Letter, Comment No. 59)*

Response

Please see the response to Comment No. 45 on p. C&R-37.

Comment

Page 196, Traffic Impacts: It is not clear whether the traffic analysis for the Phelan Loop Development Site includes the proposed traffic improvements. The proposed Ocean Avenue bicycle lane, which is a short term project and expected to be completed in five years. *(MTA. Letter, Comment No. 61)*

Response

All Plan-related roadway adjustments were assumed to be in place for the cumulative analysis, as it was not certain if the roadway adjustments would be in place by the time near-term projects would be in place. Lane removals were not included in the Existing plus Phelan Loop or Existing plus Kragen conditions.

Comment

Page 197, Phelan Loop Operations. There is potential conflict for fire truck exits when buses are entering the new Phelan Loop access from Ocean Avenue. The DEIR needs to address this

potential conflict and suggest measures to improve any such conflict. *(MTA. Letter, Comment No. 62)*

Response

Though final designs have not been prepared, it is expected that the Phelan Loop would provide enough space to allow buses to enter without affecting queuing on Ocean Avenue. Final designs for the Phelan Loop would be developed in consultation with the appropriate City agencies, including Muni, MTA, the Planning Department, the Fire Department, and the Department of Public Works, and special consideration would be given to minimize potential conflicts between buses and fire trucks.

Comment

Page 197, 3rd paragraph: Please include analysis or clarify why Muni lines 29-Sunset and 43-Masonic are not included, 29-Sunset is a major west-east commute route for students traveling from Sunset District and eastern neighborhoods to City College and 43-Masonic connects northern neighborhoods to City College. *(MTA. Letter, Comment No. 63)*

Response

Please see the response to Comment No. 50 on p. C&R-38.

Comment

Page 199, Parking Impacts: EIRs should analyze and report the worst case scenarios in terms of impacts. The parking discussion assumes that the Phelan Loop Development Site would provide a certain number of parking spaces. If there is no certainty based on some agreement or documentation, for the impact reporting purposes in this EIR, the parking analysis should include a range or parking deficits assuming no parking to maximum parking provided, similar to the methodology used to calculate and report the 2025-plus-project condition for parking. *(MTA. Letter, Comment No. 64)*

Response

As discussed on pp. 176-177 of the DEIR, the Phelan Loop site would generate a peak parking demand for 104 residential parking spaces and 82 retail parking spaces. Based on current San Francisco Planning Code requirements, the Phelan Loop site development would be required to provide 80 residential parking spaces and 27 retail parking spaces. With implementation of the proposed Area Plan, the Phelan Loop site development would not be required to provide off-street parking, as the current parking requirements would be converted into maximum parking allowances. As such, parking shortfalls associated with the Phelan Loop site may range from 79 parking spaces to 186 parking spaces. Due to these shortfalls, drivers may park outside of the Project Area or change their mode of travel, and the amount of double-parking, parking at intersections, or other illegal parking activity may increase. Measures to improve parking conditions in the

Project Area, and specifically for the Phelan Loop site, are provided in Chapter V of the DEIR.

Comment

Page 201, Loading Impacts: Similar to the parking condition, the EIR should assume a range for the project's number of loading spaces and report the deficit accordingly. *(MTA. Letter, Comment No. 65)*

Response

As discussed on p. 177 of the DEIR, the Phelan Loop site would generate a peak hour loading demand for 0.3 loading spaces, and an average hour loading demand for 0.3 loading spaces. Thus, if the Phelan Loop site were not to provide an off-street loading space, it could result in a loading shortfall of one space. Measures to improve loading conditions are included in Chapter V of the DEIR.

Comment

Page 201, 3rd paragraph: Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks double parking on Ocean Avenue. *(MTA. Letter, Comment No. 66)*

Response

The Kragen Auto Parts Site project has been designed to accommodate 65-foot trucks, the standard maximum delivery truck length for a potential full service food market. Truck turning templates for both 30-foot and 65-foot trucks are included in the appendix of the December 2006 *Balboa Park Station Area Plan Transportation Study*. As shown in those templates, 30-foot trucks would be able to maneuver into the loading areas without interrupting normal traffic conditions. The 65-foot trucks, on the other hand, would be unable to make a westbound right turn from Ocean Avenue without doing so from the center lane or requiring multiple turns, which would result in potential impacts to both traffic and transit operations. When possible, shorter trucks should be used. However, Project land uses such as supermarkets require the use of long trucks. Thus, the improvement measures listed on p. 340 of the DEIR would need to be implemented to minimize possible impacts to traffic and transit.

Comment

Page 202, Traffic Impact: Similar to the Phelan Loop Development Site noted above, the discussion needs to state clearly if the traffic improvements were considered in the analysis. Ocean Avenue bicycle lanes that could eliminate a traffic lane should be considered as an alternative. *(MTA. Letter, Comment No. 67)*

Response

Please see the response to Comment No. 61 on p. C&R-42.

Comment

Phelan Loop Site and Kragen Auto Parts Site: These sites are adjacent to each other and the development on these two sites is expected to take place within the next five years. For the existing-plus-project scenario, the EIR does not analyze and report the traffic impacts of the two projects combined. Therefore, the EIR could be underestimating and potential significant combined impacts of these two proposals for the existing-plus-project condition. *(MTA. Letter, Comment No. 68)*

Response

For Existing plus Project scenarios, the Kragen Auto Parts and Phelan Loop Sites were analyzed separately, as the Phelan Loop site currently has no project sponsor. Additional coordination would be required for this project to be completed in the near future. Therefore, the completion of this project in the near future was not assumed to be a certainty. The combined effects of these two were incorporated into the analysis of future cumulative conditions.

Comment

Page 207, 2nd paragraph: Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks extending out into Lee Avenue or double parking on Lee or Ocean Avenues. *(MTA. Letter, Comment No. 69)*

Response

Please see the response to Comment No. 66 on p. C&R-44.

Comment

Page 340, Loading. Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks extending out into Lee Avenue or double parking on Lee or Ocean Avenues which will disrupt traffic flow. Rather then listing the bullet point improvement measures to deal with an inadequate 30 foot loading dock, the food market operator should be required to construct loading docks for 69 foot truck deliveries. *(MTA. Letter, Comment No. 72)*

Response

Please see the response to Comment No. 66 on p. C&R-44.

Comment

Page 197, 4th paragraph: Reconfigure the Phelan Loop Terminal – the proposed terminal design that has buses entering from Ocean Avenue, looping around the firehouse and exiting onto Phelan

has serious space constraints and operational concerns. MTA staff is recommending that the project acquire more space on the west and north sides of the proposed terminal to increase storage capacity and flexibility. Staff is also recommending that the Phelan/Ocean/Geneva intersection be given special treatment to allow Muni buses to exit the terminal without serious delay. This will require that a system that allows buses priority be installed at the terminal exit. As an alternative, a more natural counter-clockwise loop entering on Ocean and exiting onto a less congested Lee Avenue similar to the existing terminal should be explored. Project planners should look into the feasibility of building over the existing terminal. This would allow new housing to be constructed above the terminal and both functions to co-exist in the same land space. The area surrounding the firehouse and along the waterline easement should be developed into a park-like path offering students off-street access to the Muni terminal and the Ocean Avenue commercial district. *(MTA. Letter, Comment No. 73)*

Response

The existing Phelan Loop breaks up the urban fabric at the eastern edge of the Ocean Avenue Neighborhood Commercial District, loses the connectivity between this transit node and its adjacent commercial corridor, and provides little amenities for the transit rider and a poor connection to the adjacent City College campus. A reconfigured Phelan Loop has the potential to link the Transit Station Area with the Ocean Avenue Neighborhood Commercial District and City College campus. It would function simultaneously as a new front door on Ocean Avenue for City College and as a gateway to the commercial district. Building over the existing terminal would not achieve the goal of activating the street, providing transit amenities, and creating a gateway to City College. Furthermore, the proposed reconfiguration was developed with the community, in consultation with MTA, and is representative of the community's desires for the area. Therefore, building over the existing terminal would not meet the goals of the proposed Balboa Park Station Area Plan and is not analyzed as an alternative in this EIR.

Comment

Page 160, 1st paragraph: Balboa Reservoir – This reservoir has never stored water, only cars, currently its true function is as a large parking area. This is a waste of prime land; and the City should consider construction a 2 or 3 story parking structure to free up the land for other uses. *(MTA. Letter, Comment No. 74)*

Response

As discussed as a long-term (2025) development project in the DEIR, pp. 78 and 106, if the SFPUC decides that the west basin of the Balboa Reservoir is not needed for water storage, it would be used for residential and open space development.

Comment

Page 159, 5th bullet: Reconfigure Phelan Avenue – While the redesign of this street will be beneficial to City College and improve pedestrian safety, staff believes that the concurrent

increase in congestion on Phelan will significantly delay Muni. The Phelan/Ocean/Geneva intersection cannot efficiently accommodate southbound Phelan traffic and Muni buses exiting north of the firehouse into the intersection. As noted above, a signal priority system is needed for the buses exiting the terminal. *(MTA. Letter, Comment No. 75)*

Response

In order to allow for buses to easily depart the facility and be in position to make a left turn from Phelan Avenue to eastbound Ocean Avenue, the addition of a traffic signal on Phelan Avenue at the exit to the bus loop was considered. Through preliminary reviews with MTA, this signal was removed from the plan, as it was anticipated that the plans to create a pedestrian-activated signal at the intersection of Phelan Avenue/Cloud Circle, and the "Keep Clear" designation would provide sufficient gaps in southbound traffic flow to allow Muni buses to easily exit the bus loop and merge into the left-turn lane. In addition, by providing a signal in such close spacing to the new pedestrian-activated signal at Phelan/Cloud Circle and the Ocean/Phelan/Geneva Avenue intersection, unacceptable delays to Phelan Avenue traffic could result in queues that spill back through adjacent intersections.

Upon implementation, if it is determined that the pedestrian-activated signal at the intersection of Phelan Avenue/Cloud Circle results in fewer pedestrian crossings than expected and not enough signal activations to allow Muni buses to enter the Phelan Avenue southbound left-turn lane, MTA may consider implementing its original plans for a new transit priority signal at the Phelan Loop bus layover exit. Such a change, however, is conceptual and would be subject to further analysis, environmental review, and approvals. The new bus exit at the Phelan Loop and the pedestrian-activated signal at the intersection of Phelan Avenue/Cloud Circle are evaluated in the EIR as part of the Area Plan. It should be noted that lane removal along Phelan Avenue to accommodate bicycle lanes is a project being evaluated in the *San Francisco Bicycle Plan EIR*, currently being prepared by MTA. The *San Francisco Bicycle Plan EIR* will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

Comment

We are also recommending the establishment of curbside lanes on Phelan in both the northbound and southbound directions. This will enable the 36-Tereisita and 43-Masonic buses easy passage through the congestion that forms during the school year. *(MTA. Letter, Comment No. 76)*

Response

The Area Plan does not propose transit lanes on Phelan Avenue; however, the comment is noted. Discussions are ongoing between City College and MTA that address Muni operations through the campus.

Comment

Page 160, 8th bullet: Decking over I-280 – This is a very grandiose and ambitious plan that may be extremely difficult to fund and see to fruition. Project planners should develop a less ambitious alternative or interim plan using existing spaces. A phased approach may be a more realistic one. *(MTA. Letter, Comment No. 77)*

Response

The I-280 deck proposal listed in the DEIR on p. 160 is a conceptual idea created from the community planning process. While almost $10 million of Proposition K funding has been earmarked for its implementation, as noted on DEIR p. 107, it is a Tier 3 speculative (beyond 2025) development concept. In the interim, smaller projects that conform to the Area Plan would move forward. The Balboa Park Comprehensive Station Plan, developed by BART in tandem with the Area Plan effort, identifies small-scale measures to improve pedestrian access to the Balboa Park Station and other improvements in the Transit Station Area. The BART west side walkway project is expected to start construction within the next few months. In addition, a Safe Routes to Transit grant has created an opportunity to study the proposal to build a deck over I-280 and make related improvements. This study will analyze the proposal and develop the steps needed before any particular proposal is selected to undergo environmental analysis and future decision-making by affected City and State agencies.

Comment

Page 159, 1st and 3rd bullets: Pedestrian Access/Circulation – Geneva/San Jose/Balboa Park Station – Currently, pedestrian access around the station or getting across Geneva or San Jose is a difficult prospect due to grade changes and heavy traffic. For example, disabled passengers have a difficult time navigating the transfer from the current M-line terminal and the BART station due to the grade and myriad of uneven pavement surfaces and Muni tracks the must navigate. *(MTA. Letter, Comment No. 78)*

Response

Comment noted. In general, the Area Plan's intent is to improve access to and from public transit. All proposed changes in the area would comply with ADA requirements.

Comment

Page 187, 2nd & 3rd paragraph: The M-line terminal has been the scene of at least one pedestrian fatality since alighting M-line passengers do not heed traffic signals and jaywalk directly across the street. The plan is proposing improvement to the M-line terminal. *(MTA. Letter, Comment No. 79)*

Response

Comment noted. As presented in the DEIR on p. 88, the Area Plan's intent is to reconfigure and improve streetcar and bus stops. MTA will consider reconfiguration of the M-line to improve the existing hazardous conditions.

Comment

Page 188, 2nd paragraph: At the Balboa Park Station, the J-line passenger stop is not safe and does not allow a safe, natural walking route to San Jose Avenue. Currently, pedestrians walk along the right-of-way or through a narrow choke point to reach San Jose Avenue. This is primarily due to the constrained area and significant grade changes between passenger stop and Geneva Avenue. *(MTA. Letter, Comment No. 80)*

Response

Comment noted. As presented in the DEIR on p. 87, the Area Plan's intent is to reconfigure and improve streetcar and bus stops. MTA will consider reconfiguration of the J-line to improve the current hazardous conditions.

Comment

Various projects, including the near-term addition of 250 residential units at the Phelan Loop and Kragen Auto Parts site, will result in increased traffic on I-280, Ocean Avenue, Phelan Avenue and on other local streets. The DEIR recognizes that this increase will translate in an overall degradation of service at important intersections such as Ocean/Geneva/Phelan, Ocean/I-280 On-ramp, and Ocean/San Jose. Longer-term development will greatly aggravate this situation. Yet the DEIR itself repeatedly features phrases such as "No feasible mitigation measures have been identified," and " …would be expected to deteriorate to unacceptable levels of service…," and "…would results in significant adverse impacts." Nowhere are mitigation measures outlined that would actually reduce some of the this substantial impact. And until such measures, along with the necessary funding and implementation timeline, are identified and adopted, the developments in the Plan, including the Phelan Loop and Kragen Auto Parts Site, should not be approved. (*Sunnyside Neighborhood Association. Letter, Comment No. 81)*

Response

The DEIR on pp. 180-181 notes that traffic impacts on five intersections in the Area Plan would be significant and unavoidable. Three intersections would deteriorate to unacceptable levels as a result of implementation of the Area Plan (Ocean/Geneva/Phelan, Ocean/I-280 northbound off-ramp, and the proposed new Geneva/I-280 northbound and southbound ramps); and two intersections would operate at unacceptable levels with or without implementation of the Area Plan (Ocean/Junipera Serra and Ocean/San Jose).

The DEIR on p. 327 cites three mitigation measures to improve operating conditions: (1) extend signal cycle length at Ocean/Junipero Serra by 15 seconds on eastbound and

westbound approaches, (2) remove on-street parking from the Ocean/I-280 northbound on ramp westbound approach to create an exclusive right-turn lane, and shift green time to eastbound left-turn movement to accommodate the increased eastbound left-turn volume, and (3) shift the green time at Ocean/San Jose from the north-south to the east-west. Because all three measures would require additional assessment by MTA, impacts would remain significant and unavoidable.

While no feasible mitigation measures have been identified to reduce these impacts to a less-than-significant level, impact fees could be levied to fund transportation improvements. However, because there is no assurance that these measures could be funded or implemented, for purposes of CEQA, transportation impacts at five Project Area intersections would remain significant and unavoidable.

Comment

At previous meetings to provide information and solicit neighborhood input, including one held at Lick Wilmerding High School on July 24, 2006, local residents noted that the Municipal Transportation Agency, the Planning Department and other City agencies needed to coordinate their plans with City College of San Francisco. Development of the Balboa Park Station Area Plan along Ocean Avenue and Phelan Avenue would occur at the same time that significant development is taking place immediately adjacent at CCSF's main campus on Phelan Avenue.

In particular, it was pointed out that the proposal to re-route Muni bus traffic from the existing Phelan Loop to a route involving turns in and out of Phelan Avenue would compromise pedestrian safety and impede the movement of both buses and other vehicular traffic. The already poor performance of the Ocean/Geneva/Phelan intersection would further degrade. Nonetheless, the DEIR states that Muni buses, after circling clockwise around the fire station will turn right and head southbound on Phelan. Left-turns supposedly would be accommodated with a proposed "Keep Clear" zone.

With traffic on Phelan already routinely backed up at this location even without the addition of the bus traffic, it is wishful thinking to imagine that a "Keep Clear" zone is the answer to this impossible mix of too many buses, too many vehicles and too many pedestrians in much too small a space.

CCSF is well aware of this limitation and voiced its opposition to any bus re-routing which would have the buses now moving in and out from Ocean in the Phelan Loop using Phelan instead. Yet that is exactly what the flawed Plan outlines, and the DEIR fails completely to address the traffic safety and operational issues created by the proposed change. MTA and the Planning Department should be required to work with City College to identify a mutually acceptable traffic plan for accommodating the Muni buses that now use the Phelan Loop as a turnaround. It is ironic that projects which purport to promote transit result in a major operations and safety issue for our local bus lines. (*Sunnyside Neighborhood Association. Letter, Comment No. 82)*

Response

Please see the response to Comment No. 75 on p. C&R-47.

Comment

Bicycle Lanes on Ocean and Phelan Avenues, Lack of Coordination with CCSF

The proposed bicycle lanes on Ocean Avenue and Phelan Avenue as outlined in the Plan will also result in major negative impacts for which no mitigation has been identified in the DEIR. The bicycle lanes should not be allowed unless such measures are identified and implemented. MTA, the Planning Department and other City agencies must be required to work with City College to identify mutually acceptable bicycle routes. At previous meetings, CCSF and many residents have voice consistent opposition to removing a traffic lane from Phelan or Ocean or both in order to add bicycle lanes. (*Sunnyside Neighborhood Association. Letter, Comment No. 83)*

Response

The proposals to add bicycle lanes to Phelan Avenue and Ocean Avenue are part of a plan to improve overall circulation for all modes of travel, including bicyclists, pedestrians, motorists, and transit. In general, it was found that queuing lengths may increase as a result of lane removals; however, overall intersection operations would be unlikely to change substantially – with the exception of the westbound approach to the Ocean/Phelan/Geneva Avenue intersection (see the response to Comment No. 89 on p. C&R-53. Final designs would be developed in consultation with all relevant agencies, including Muni, MTA, the Planning Department, the Fire Department, and the Department of Public Works, and emphasis would be placed on alleviating the expected congestion along westbound Ocean Avenue.

The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR.*

Comment

It was pointed out that on Ocean, unacceptable degradation of both transit operations and intersection operation would result. And on Phelan, rather than eliminating a traffic lane and creating conflicts, it was proposed that the city work with CCSF to identify a route, possibly one that goes through the campus, that would be safer and more attractive for bicyclists. The current DEIR contains no indication that any consultation with the college took place, and such a joint effort to solve the issue of bicycle access must be undertaken before any changes are made to the configuration of Phelan and Ocean, major routes our residents depend on. (*Sunnyside Neighborhood Association. Letter, Comment No. 84)*

Response

The Planning Department and MTA are working closely with CCSF on the design of Phelan and Lee Avenues and related proposals for bike lanes. Phelan Avenue is a designated city bicycle route that provides a direct, convenient, and flat north-south path; there are no other north-south routes available until San Benito Way to the west and Cayuga Avenue to the east. The DEIR on p. 193 notes that the addition of bicycle lanes and the elimination of travel lanes on Phelan Avenue would not result in significant impacts to traffic operations; however, the addition of a bicycle lane and the elimination of one westbound travel lane on Ocean Avenue would result in significant impacts on traffic operations at the Ocean/Geneva/Phelan Avenue intersection.

The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA, will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

Comment

Parking
The long-term projection for a parking shortfall of almost 1,000 spaces every weekday evening is almost as shocking as the nonexistent or woefully inadequate mitigation described in the DEIR. Vague references to possible transit improvements which are neither planned, funded or even remotely likely are not mitigation measures and no approval should be allowed based on such empty promises. (*Sunnyside Neighborhood Association. Letter, Comment No. 85)*

Response

As described on p. 177 of the DEIR, in San Francisco, parking deficits are considered to be social effects rather than physical environmental impacts as defined by the CEQA. The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular would be in keeping with the City's Transit First policy, as established in the City's Charter Section 16.102, which provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking

farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably address the potential secondary effects.

As the commenter notes, should the maximum amount of parking be supplied, a shortfall of 929 parking spaces may occur. However, it should be noted that this total is considered a conservative estimate. As the details of individual projects within the Project Area are finalized, these projects would be able to provide additional parking to accommodate their own demand. Each individual project also may choose to implement measures to reduce its own parking demand, such as providing car share spaces or implementing a Transportation Demand Management program. Also, due to the high level of transit availability in the area, the actual parking demand may be somewhat lower.

Comment

As referenced in the DEIR, City College is preparing to develop its share of the Balboa Reservoir along Phelan Avenue. That development includes constructing an extension of Lee Avenue from the south property line, connecting to the extension of Lee Avenue included in the Balboa Area Plan, running along the west side of its development to the north end and then east to Phelan Avenue just south of Archbishop Riordan High School. This new street is considered a critical part of the Campus development to decrease traffic on Phelan Avenue, provide safe access to the remaining reservoir parking and the future buildings on the west side of Phelan Avenue.

By allowing access from Ocean onto this new street, traffic on Phelan will decrease significantly, leading to much improved pedestrian safety conditions. By allowing traffic to exit the campus parking via Lee Avenue onto Ocean, traffic conditions will, again be made safer.

City College requests right turn access on to Lee coming from the south on Ocean Avenue, allowing access to the parking and service functions within the new campus development. Further, we request that traffic exiting the Campus be allowed to turn either right or left from Lee to Ocean Avenue. City College does not believe that Lee Avenue traffic from the south of Ocean should be allowed to cross Ocean and enter the Campus.

City College feels that restricting Lee Avenue access is unnecessary and would actually create adverse traffic conditions. The restrictions posed in the DEIR are passed on unrealistic traffic growth projections, described in the DEIR. Therefore, on behalf of City College, I respectfully suggest that the City approve the Lee Avenue Connection to CCSF Variant as part of the Balboa Park Station Area Plan, along with a “Statement of Overriding Considerations” for the Lee/Ocean intersection that eliminates the need for unnecessary mitigations or access restrictions that would be based on inflated growth projections. (*City College of San Francisco. Letter, Comment No. 89)*

Response

In response to the comment, the following text is added at the bottom of DEIR p. 184.[5]

By constructing an extension of Lee Avenue that would connect with Phelan Avenue south of Archbishop Riordan High School, traffic levels on Phelan Avenue may decrease, reducing the number of pedestrian and automobile conflicts along Phelan Avenue. However, traffic levels on Ocean Avenue and Lee Avenue would correspondingly increase, leading to undesirable conditions for traffic, transit, and pedestrians on Ocean Avenue.

Under existing conditions, intersections in the immediate vicinity of the Plan Area were found to operate at LOS C or better. Under Cumulative plus Project conditions (full buildout of the *Balboa Park Station Area Plan*, the planned expansion of CCSF, and other background development throughout the City), congestion along Ocean Avenue is expected to substantially increase, causing most intersections along Ocean Avenue to operate at LOS D. In the DEIR, it was assumed that vehicles would continue to access CCSF from Phelan Avenue only, as in the existing configuration.

To specifically address the questions and concerns raised by CCSF, the following access options were examined further:

1. CCSF would have right-turn-only ingress on Lee Avenue from westbound Ocean Avenue. CCSF would continue to have full ingress and egress on Phelan Avenue from westbound and eastbound Ocean Avenue.

2. CCSF would have full egress, but no ingress, on Lee Avenue from Ocean Avenue. CCSF would continue to have full ingress and egress on Phelan Avenue from westbound and eastbound Ocean Avenue.

Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress on Lee Avenue. Table C&R 1 below compares levels of service and queuing conditions for this access option and the configuration assumed in the DEIR at the westbound approach to the Ocean/Lee intersection.

[5] For readability, the new text is not further indented or double underlined.

TABLE C&R 1

Level of Service and Queuing Comparison – Ocean/Lee Intersection, Westbound Approach, Weekday PM Peak Hour

Access Option	Queuing Comparison			Level of Service Comparison	
	Queue Storage Length		Total Queued Vehicles (Length)	LOS	Delay (in seconds)
	Distance to Harold Avenue	Distance to Phelan Avenue			
DEIR (Cumulative plus Project Conditions)	250 feet	450 feet	35 vehicles (441 feet)	B	(16.3)
Access Option #1 (Cumulative plus Project Conditions, right-turn-only ingress on Lee Avenue)	250 feet	450 feet	43 vehicles (533 feet)	C	(21.6)

Source: DMJM Harris, 2008.

As shown in Table C&R 1, the average delay per vehicle during the weekday PM peak hour at the westbound approach to the Ocean/Lee intersection would increase by over five seconds by providing westbound right-turn-only ingress for CCSF traffic; however, the approach would continue to operate at an acceptable level of service.

The Lee Avenue extension is located about 250 feet to the west of Harold Avenue (a residential roadway that extends south of Ocean Avenue only and is stop-controlled at Ocean Avenue), and 450 feet to the west of Phelan Avenue. An evaluation of the potential queues at the westbound left-turn movement at these two intersections was conducted for full buildout (year 2025) conditions. Without CCSF ingress to Lee Avenue, the queues that would form along the westbound approach would extend past Harold Avenue but would not reach Phelan Avenue. However, when CCSF traffic is added to this approach, the queues would extend past Phelan Avenue. With these queued operations, there would be the potential for substantial conflicts between vehicles on Phelan, Ocean, and Geneva Avenues, and delays to transit operations.

General traffic operations along the westbound approach to the Ocean/Lee intersection are complicated by two main factors that would be exacerbated by CCSF traffic: (1) the presence of the Muni light rail boarding island, and (2) the solid white line that prohibits lane changes between the two westbound lanes between Phelan and Lee Avenues. In addition, all southbound right turns from Phelan Avenue are forced into the right lane of Ocean Avenue until Lee Avenue, and there are moderate pedestrian volumes along Ocean Avenue and crossing Ocean Avenue. When queuing along the westbound right lane is long, vehicles are unable to change over to the left lane to avoid delays. This results in a substantial adverse effect on those vehicles coming from the Phelan Avenue southbound right-turn movement. Similarly, when Muni loading and unloading occurs at the boarding island, queued vehicles behind the Muni train in the westbound left lane

would be unable to change over to the right lane. Thus, any additional queuing or delays along westbound Ocean Avenue due to CCSF vehicles attempting to enter the CCSF campus via Lee Avenue would substantially worsen these queues and lead to additional congestion, which, in turn, would result in substantial adverse impacts on other upstream intersections.

It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left-turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.

To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at Lee Avenue.

Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-

turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan.

Access Option #2: Under this option, CCSF would be allowed egress only on Lee Avenue, assuming that CCSF ingress would occur on Phelan Avenue. Because CCSF ingress would not be allowed at Lee Avenue, it is assumed that eastbound left turns would be allowed for all traffic, including for vehicles destined for the Phelan Loop and Balboa Reservoir development sites. Thus, Lee Avenue north of Ocean Avenue would be striped as a two-way street between Ocean Avenue and the Reservoir development driveway, and a one-way southbound-only street between CCSF and the Reservoir development driveway. Additionally, to completely eliminate the possibility of traffic cutting through the neighborhood south of Ocean Avenue, northbound and southbound through movements at the Ocean/Lee intersection are assumed to be restricted.

Table C&R 2 below compares levels of service and queuing conditions at the southbound approach to the Ocean/Lee intersection for Access Option #2 and the configuration assumed in the DEIR. It should be noted that the location of the Reservoir driveway on Lee Avenue is currently unknown. The Kragen Auto Parts Site driveway on Lee Avenue would be set back approximately 100 feet from the Ocean/Lee intersection.

TABLE C&R 2

Level of Service and Queuing Comparison – Ocean/Lee Intersection, Southbound Approach, Weekday PM Peak Hour

Access Option	Queuing Comparison			Level of Service Comparison	
	Queue Storage Length		Total Queued Vehicles (Length)	LOS	Delay
	Distance to Kragen Driveway	Distance to Reservoir Driveway			
DEIR (Cumulative plus Project Conditions)	100 feet	N/A	6 vehicles (70 feet)	C	(34.5)
Access Option #2 (Cumulative plus Project Conditions, full CCSF egress on Lee Avenue)	100 feet	N/A	9 vehicles (110 feet)	D	(38.4)

Source: DMJM Harris, 2008.

As shown in Table C&R 2 above, by providing full CCSF egress, the delay at the southbound approach to the Ocean/Lee intersection would increase by nearly four seconds and the level of service would worsen from LOS C to LOS D. Thus, the

approach would continue to operate at acceptable levels of service. This analysis assumes the provision of two southbound lanes – a left-turn lane and a right-turn lane.

As currently planned, the driveway for the Kragen Auto Parts Site would be located approximately 100 feet to the north of the Ocean/Lee intersection (the driveway location of the Reservoir Site has not been finalized). Under the DEIR configuration, as many as six vehicles are expected to be queued at the southbound approach to the intersection during the PM peak hour, averaging approximately 70 feet in length per lane, and would not be expected to extend beyond the Kragen Auto Parts Site driveway. With the addition of CCSF vehicles, the queuing at the southbound approach to the intersection would be expected to extend to nine vehicles, averaging approximately 110 feet long per lane, thereby extending past the Kragen Auto Parts Site driveway. As a result of the additional queuing, Kragen Auto Parts Site internal circulation would be adversely affected, as vehicles attempting to leave the Kragen Auto Parts Site would be blocked and would have to wait for queues to subside to enter the intersection.

To reduce the queue length and average delay, an adjustment to the signalization plan at the Ocean/Lee intersection may be possible. By providing a split phase between northbound and southbound traffic (southbound vehicles would get a short time without conflicting movements from northbound traffic), queues at this approach would be allowed to clear out while minimally affecting delay for northbound traffic. Such an improvement may require installation of a new traffic signal, as the current signals may not have the required hardware and software infrastructure. Also, to ensure that queued vehicles do not block the Kragen driveway, Lee Avenue could be striped with a “Keep Clear” marking. It would also be beneficial to add signage on Ocean and Lee Avenues to notify CCSF traffic that Lee Avenue provides a CCSF exit only, and that the CCSF entrance is located on Phelan Avenue.

In summary, it would be possible to allow CCSF vehicles to utilize Lee Avenue as an egress from the campus (no ingress), when combined with modifications to the Ocean/Lee intersection traffic signal and physical modifications to restrict vehicles from traveling across Ocean Avenue and continuing on Lee Avenue south of Ocean Avenue; however, ingress to CCSF from Lee Avenue (as described in Access Option #1) would result in significant adverse transportation impacts. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan.

Comment

The motor vehicle traffic growth forecasts contained in the September 21, 2007 Balboa Park Station Area Plan Draft Environmental Impact Report (DEIR) are unreasonably inflated and should not be relied upon as the sole basis for future transportation decisions affecting the Ocean, Phelan and/or Lee Avenue corridors.

The DEIR traffic forecasts are based on the theoretical traffic increases that would occur due to

full build-out of the allowable land uses described in the Balboa Park Plan within a relatively short period of time. Such a large amount of development would be contrary to ABAG growth projections.

In addition, despite the transit-oriented development emphasis of the Balboa Park Plan, the traffic growth forecast assumes heavy reliance on automobiles for most trips (despite the fact that plan development would occur on a pedestrian corridor within close proximity of BART and light-rail stations). As a result, the forecasted growth in automobile traffic is further inflated.

The inflated nature of the traffic forecasts is reflected on page 171 of the DEIR, where it is stated that the Planning Department made adjustments to ABAG and SFCTA growth projections in order to account for the greater level of housing growth envisioned by the Balboa Park Plan, and to provide a "conservative estimate" of the travel demands and impacts generated by the plan. The use of "conservative" in this context does not mean the traffic forecasts are conservative; instead, this means that the traffic forecasts were adjusted upward to provide a "worst-case scenario" to be analyzed in the EIR.

As a result of the inflated traffic growth forecast contained in the DEIR, the analysis of the Lee Avenue Connection to CCSF Variant (summarized on p. 184 of the DEIR) is overly conservative in its assessment of potential impacts. The Lee Avenue Connection to CCSF analysis stems from ongoing discussions between City College and the San Francisco Planning Department concerning the potential extension of Lee Avenue north from Ocean Avenue to provide a second access route to the new CCSF Performing Arts Center and other facilities to be located within the Balboa Reservoir. This would extend the City's existing street grid into the reservoir (supporting a key goal of the Balboa Park plan) and allow for a reduction in traffic volumes on Phelan Avenue (further facilitating the planned installation of bicycle lanes on Phelan that is called for in the Balboa Park plan). (*City College of San Francisco. Letter, Comment No. 90)*

Response

As described on p. 170 of the DEIR, cumulative traffic growth projections were made using the City of San Francisco's standard methodology, which is the San Francisco County Transportation Authority (SFCTA) countywide travel demand forecasting model, which incorporates the Association of Bay Area Governments (ABAG) land use and socioeconomic database and growth forecasts for the year 2025. ABAG's projections do not specifically include San Francisco's most recent emphasis on housing production, including the *Balboa Park Station Area Plan*, the Better Neighborhoods planning efforts, and various Redevelopment Agency projects; therefore, the Planning Department revised upwards the future estimates of household growth in San Francisco. At the same time, the Planning Department revised downwards the total citywide employment growth for the 2000–2025 period based on land availability.

The modal split for the proposed project was determined using a combination of data from the SFCTA model and the San Francisco Planning Department's *2002*

Transportation Impact Analysis Guidelines for Environmental Review. To determine whether there may be a shift in mode of travel from automobiles to transit, model output for the year 2025 (which included the expected growth associated with the *Balboa Park Station Area Plan*) was compared with output for the year 2005. Overall, the model did not predict a substantial shift in modal split characteristics. These results suggest that future residents in the Project Area would be no more or less likely to use the available transit than current residents. These results are not unexpected, as the Project would not provide additional service to the area, and no other major service changes were assumed in the future.

The DEIR assumes that all portions of the *Balboa Park Station Area Plan* would be built by the year 2025. While it is possible that not all parcels within the Project Area would be fully redeveloped by the year 2025, as with all environmental documents prepared by the City, a conservative scenario is presented so as not to underestimate potential impacts that may be caused by the proposed project. However, the growth projections should not be considered conservative to a fault, as non-Project Area background growth rates are relatively low (i.e., less than one percent per year along Ocean Avenue), and growth associated with the Project Area was calculated using the most up-to-date project description and the City's standard methodology (resulting in a higher amount of transit usage).

Comment

However, based on the conservative analysis contained in the DEIR, the San Francisco Planning Department recommended against allowing City College to have full access to Lee Avenue. Instead, Lee Avenue access to City College would primarily be limited to outbound travel (exiting the reservoir to Ocean via Lee) and possible inbound access via a right-turn from westbound Ocean to northbound Lee (subject to further study). Limited truck access to CCSF facilities would also be allowed under this recommendation.

Again we believe that restricting Lee Avenue by not allowing our students and faculty access to and from the west campus development via Lee on to Ocean is unnecessary. The basis for this restriction is unrealistic and unsupportable traffic growth projections. We therefore respectfully ask that the City approve the Lee Avenue Connection to CCSF Variant as part of the Balboa Park Station Area Plan, along with a "Statement of Overriding Considerations" for the Lee/Ocean intersection that eliminates the need for unnecessary mitigations or access restrictions based on inflated growth projections. (*City College of San Francisco. Letter, Comment No. 91)*

Response

As discussed in the response to Comment No. 89 on p. C&R-54, by providing westbound right-turn-only CCSF ingress at Lee Avenue, excessive queuing would occur which would substantially affect operations at the Ocean/Phelan/Geneva intersection. Because the eastbound left turns at Lee Avenue would need to be restricted, some traffic can be expected to divert into the neighborhood streets south of Ocean Avenue to gain access

from the west. Also, due to the location of the Muni boarding island, pedestrian volumes, and the fact that between Lee Avenue and Phelan Avenue vehicles are not allowed to change lanes, traffic operations and queuing conditions along the westbound approach to the Ocean/Lee intersection would substantially worsen. Thus, allowing CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Consequently, this option has been eliminated from further consideration.

However, it may be possible to allow CCSF to have full egress on Lee Avenue (assuming the provision of two southbound lanes) with the provision of a short protected left-turn green phase for southbound traffic and the implementation of a "Keep Clear" zone in front of the Kragen Auto Parts Site driveway.

Comment

We have reviewed the Draft Environmental Report for the Balboa Park Station Area Plan dated September 21, 2007 and have the following additional comments. Note these comments are intended to supplement the comments already provided by the SFMTA in letter dated November 2, 2007.

We support the goals of the Balboa Park Station Area Plan to improve the Balboa Park area with housing and neighborhood improvements. However, we feel the plan does not fully examine how some of these measures will adversely impact its current function as one of the busiest transit hubs in the city, on a previously identified emerging transit corridor slated for major infrastructure improvements.

The plan does not manage the impacts of City College or BART parking and does not fully explore Muni service radiating from the project area. It does not fully examine the operations at Phelan Loop or quantify the potential impacts of the redevelopment related route changes or how the area-wide design standards will impact Muni service and performance. *(MTA, Muni Service Planning. Letter, Comment No. 92)*

Response

Comment noted. Individual points raised in this comment are addressed as responses to the following comments: CCSF and BART parking impacts –Comments 64 and 85 (pp. C&R-43 and 52); impacts on Muni operations –Comments 80, 101, and 159 (pp. C&R-49, 64, and 84); transit impacts at the Phelan Loop; Comment 62 (p. C&R-43); Muni route changes – Comments 79 and 152 (pp. C&R-49 and 82).

Comment

In terms of street space, the plan makes does not mitigate all of the impacts it identifies and there are only a few concessions to the needs of buses operating in mixed traffic, especially at those locations where congestion and project related route changes would create major delays. In some

instances one would expect that these impacts could be mitigated with restricted or dedicated transit lanes. *(MTA, Muni Service Planning. Letter, Comment No. 93)*

Response

Comment noted. Individual points raised in this comment are addressed in the following responses: mitigation of transit impacts – Comments 81 and 137 (pp. C&R-49 and 77); bus operations at congested intersections – Comment 75 (p. C&R-47); project-related route changes –Comment 76 (p. C&R-47); restricted or dedicated transit lanes as mitigation measures –Comments 97 and 101 (pp. C&R-63 and 64).

Comment

Given the importance of this regional transit hub, the transit impacts are only defined in the terms of the impacts of the new residents who will commute downtown. It is not clear what the impacts of this project will be for everyone else. *(MTA, Muni Service Planning. Letter, Comment No. 94)*

Response

Please see the response to Comment No. 50 on p. C&R-38.

Comment

In the past six months, Muni's ability to get ridership and performance information has increased considerably. We would welcome the opportunity to help better identify and quantify the magnitude that these impacts will have on Muni's passengers, and work towards identifying appropriate mitigations that would complement Balboa Park's accessibility and livability to all. *(MTA, Muni Service Planning. Letter, Comment No. 95)*

Response

This comment is acknowledged. The Planning Department welcomes MTA's input regarding future transportation improvements in the Project Area.

Comment

In congested peak hour conditions, without any new signals, all buses departing the new facility will have difficulty entering Phelan. It should also be pointed out that these same buses will also have to, in a very short distance, maneuver into the left lane in order to make a left turn onto Geneva. (page 16) *(MTA, Muni Service Planning. Letter, Comment No. 96)*

Response

Please see the response to Comment No. 75 on p. C&R-47.

Comment

Consider the benefits of a new southbound dedicated curbside transit lane on Phelan Avenue. This would improve travel times on lines 36 and 43. *(MTA, Muni Service Planning. Letter, Comment No. 97)*

Response

The *Balboa Park Station Area Plan* proposes to reconfigure Phelan Avenue to provide northbound and southbound bicycle lanes. Given the limited right-of-way available on Phelan Avenue, a southbound dedicated curbside transit lane would preclude the establishment of these bicycle lanes. In addition, the two bus lines that operate on this segment of Phelan Avenue have service frequencies averaging every 15 minutes. Thus, implementation of a transit-only lane would have limited benefit to transit bus operations. In addition, should a curbside transit lane be provided, secondary impacts may occur, such as increased vehicular delay and queuing associated with buses attempting to enter the left-turn lane at Ocean Avenue. To alleviate these congestion issues, further measures would be required, such as queue jumping priority for Muni buses.

Comment

Why is the wording concerning the bus layover facility traffic control limited to a new pedestrian-activated signal when a new traffic signal linked to both the upstream pedestrian signal and the signal at Ocean would be needed to facilitate Muni egress into the Ocean/Phelan/Geneva intersection? (page 16) *(MTA, Muni Service Planning. Letter, Comment No. 98)*

Response

Please see the response to Comment No. 75 on p. C&R-47.

Comment

Key import is give to the provision of new landscaped medians along Geneva, Ocean and Phelan Avenues, but there is little discussion on how these landscaped medians and corner modifications will impact future transportation improvements (like dedicated transit lanes) in the study area. (page 40) Such landscaping may be appropriate in some locations, and not in others given future transit needs. This document makes no such distinction. *(MTA, Muni Service Planning. Letter, Comment No. 99)*

Response

The proposed landscaped medians are not expected to result in changes in roadway capacity, as they would not require the removal of travel lanes. Regarding corner modifications, the elimination of free right turns at certain locations was accounted for in the analysis of traffic impacts.

Comment

Implementation of the Proposed Area Plan would cause "substantial" congestion on Phelan and Ocean Avenue that would directly and adversely impact Muni service. These impacts are alluded to, but these congestion related impacts have not been specifically identified. (page 44) (*MTA, Muni Service Planning. Letter, Comment No. 100)*

Response

As noted on p. 44 of the DEIR, should the planned lane removal on Ocean Avenue occur, vehicular delay can be expected to worsen. Though such a lane removal would not affect bus maneuvering, the increased vehicular delay may affect the ability of Muni lines to run on time and stay on schedule. This impact is described in greater detail on p. 193 of the DEIR.

Comment

It is not clear if this document has referenced Muni's 2006 Short Range Transit Plan (SRTP). (We can not find a reference to it in the DEIR). In Muni's SRTP, in the Service Planning and Expansion section, reference is made to "A Vision for Rapid Transit in San Francisco (February 2002). The "Vision Plan" has identified Geneva and Ocean Avenues as key corridors that should be considered for a future BRT or LRT improvements. A key interim step recommended by the Vision Plan is the establishment of an exclusive ROW for the K Line on Ocean Avenue.

What findings in the preliminary transportation analysis caused the dedicated LRT lanes on Ocean between Phelan Avenue and Mannor to be removed from the Area Plan? (page 85) *(MTA, Muni Service Planning. Letter, Comment No. 101)*

Response

The following text is added to the DEIR on p. 126, after the second paragraph:

Muni's Short Range Transit Plan

The *Short Range Transit Plan* is Muni's primary planning document, providing information on Muni's organization, major initiatives, service plans, capital improvement program, and operating financial plan. Chapter 5, Planning and Expansion, of MTA's *FY 2008-2027 Draft Short Range Transit Plan* notes that MTA's February 2002 *A Vision for Rapid Transit in San Francisco* identifies Geneva Avenue/Ocean Avenue as a major transit corridor and as a site for a possible future rail project.[6] MTA's 2002 *A Vision for Rapid Transit in San*

[6] MTA, *FY 2008-2027 Draft Short Range Transit Plan*, http://www.sfmta.com/cms/rsrtp/srtpindx.htm#fy2008, accessed August 8, 2008.

Francisco notes that an interim step on Geneva Avenue would be to establish an exclusive right-of-way for the K-line on Ocean Avenue.[7]

During early stages of development of the *Balboa Park Station Area Plan*, the removal of a travel lane for transit-only use on Ocean Avenue was considered to improve transit operations throughout the area. The proposal was to convert the current center travel lanes on eastbound and westbound Ocean Avenue (which contain the K-Ingleside light rail tracks) into transit-only lanes. A traffic analysis of this proposal concluded that while transit-only lanes would improve Muni light rail operations, they would significantly impact operations of the adjacent travel lane – resulting in unacceptable queuing and congestion impacts (and substantial delays to bus operations). With only one lane available for vehicular traffic, volumes on Ocean Avenue would exceed the available capacity, and few gaps would be available for left-turning vehicles to maneuver, potentially resulting in gridlock.

The plan was then modified to allow left-turning vehicles only to use the transit-only lane. While delay and queuing associated with left turns waiting for gaps in traffic would be reduced, Muni light rail operations would worsen, and still not enough roadway capacity would be available for general traffic on Ocean Avenue. Thus, it was determined that the removal of a travel lane for transit-only use would be detrimental for traffic and transit operations as a whole. Consequently, this proposal was eliminated from further consideration.

Comment

The Muni SRTP (page 50) also lists Geneva Avenue and Ocean Avenue as two of the City's twenty key transit corridor infrastructure improvement projects. This Draft EIR does not fully discuss how this area plan would meets Muni's goals to: 1. Integrate local and regional transit into a seamless network. 2. Physically separate transit service from automobile on major corridors by creating exclusive rights of way. 3. Provide high capacity, rapid transit style service on major corridors. 4. Upgrade transit service in increments as ridership builds and as funding becomes available *(MTA, Muni Service Planning. Letter, Comment No. 102)*

Response

In general, the Area Plan is consistent with Muni's goals, as the Area Plan intends to increase residential development levels near major transit access locations, make improvement to existing transit facilities, and make improvements for non-auto modes of travel.

The Plan does not contain congestion-inducing recommendations; nevertheless, it would enhance non-auto modes that are currently well designed and are in need of improvement in the area.

[7] MTA, *A Vision for Rapid Transit in San Francisco (2002)*, http://www.sfmta.com/cms/rprinit/visindx.htm, accessed August 8, 2008.

Comment

The plan as it is presented in this DEIR, does not fully identify how its congestion inducing recommendations and limited number of transit lane dedications and signal modifications will hamper Muni service and degrade service for the large number of transit passengers who ride Muni's surface lines to and through the project area. *(MTA, Muni Service Planning. Letter, Comment No. 103)*

Response

Please see the response to Comment No. 101, p. C&R-64. Enhancements for non-auto modes of travel that are proposed as part of the Area Plan would ultimately have a secondary effect on traffic operations, potentially leading to traffic impacts that cannot be mitigated. These improvements would require a policy decision in order to be implemented as currently proposed. Consequently, for purposes of CEQA analysis of the Area Plan, such proposals have been eliminated from further consideration.

Comment

Was the new Phelan Loop Site Bus Terminal Exit on Phelan one of the study intersections? (page 44) *(MTA, Muni Service Planning. Letter, Comment No. 104)*

Response

The intersections that were chosen for analysis in the *Balboa Park Station Area Plan Transportation Study* were determined through a scoping meeting with City staff. The intersections selected for analysis were those that could experience a high enough increase in traffic levels to constitute a potentially significant impact. The Phelan Avenue/Phelan Loop bus terminal exit was not chosen for analysis due to its limited use by buses only, and in general, since the Area Plan does not call for the signalization of this intersection, delays for buses would be a function of Ocean/Phelan/Geneva Avenue intersection delay. Because buses would use this intersection relatively infrequently, the average delay would be minimal.

Comment

Why have new traffic transit priority signal controls at the bus layover exit at Phelan and Ocean not been identified as a mitigation measure? (page 43) *(MTA, Muni Service Planning. Letter, Comment No. 105)*

Response

Please see the response to Comment No. 75 on p. C&R-47.

Comment

Please clarify the statement about transit impact fees to purchase and operate additional cars and service not being a mitigation. Why is the statement made that "these measures could not be

funded or implemented by MTA"? Why would MTA be obligated to pay transit impact fees? (page 44) *(MTA, Muni Service Planning. Letter, Comment No. 106)*

Response

Commercial development projects in the City are subject to transit impact development fees, which could be used to enhance Muni service in the vicinity of the project. However, as discussed on p. 44 of the DEIR, at a program level of analysis, there is no guarantee that such funding could support the required level of transit improvements to reduce the ridership capacity utilization in the area, even including the project's contribution.

Comment

The design and tightening of turning radii of the entry into the new Phelan terminal should also be done in a manner to safely accommodate the passage of the 190 Muni transit vehicles that use this terminal each day. (page 82) *(MTA, Muni Service Planning. Letter, Comment No. 107)*

Response

Final plans for intersection reconfigurations would be developed in consultation with the appropriate City agencies, including Muni, MTA, the Planning Department, the Fire Department, and the Department of Public Works, and would reflect the turning radii and clearance needs of all types of users.

Comment

The terminal should be designed so that buses waiting to enter the new Phelan terminal would not block the fire station's driveway. *(MTA, Muni Service Planning. Letter, Comment No. 108)*

Response

Comment noted. Prior to implementation, all proposed intersection reconfigurations will need to be designed, reviewed, and approved by the appropriate city agencies. MTA staff would be consulted throughout the design process.

Comment

At the corner of San Jose and Geneva, where will corner bulbs be installed and how large will they be? (page 82) *(MTA, Muni Service Planning. Letter, Comment No. 109)*

Response

Please see the response to Comment No. 107 above.

Comment

How will the proposed changes at San Jose and Geneva impact existing bus performance on the westbound Geneva Avenue approach south of San Jose? (page 82) *(MTA, Muni Service Planning. Letter, Comment No. 110)*

Response

The proposed changes at the San Jose/Geneva intersection would have a minimal effect on existing bus performance, as there would be no reduction in overall roadway capacity.

Comment

Without any direction arrow, street names or curb lines visible, it is difficult to understand what Figure 5, 'Proposed Transit Reconfiguration' is illustrating. (page 84) *(MTA, Muni Service Planning. Letter, Comment No. 111)*

Response

DEIR Figure 5 has been revised as Figure C&R 2 on p. C&R-22 to provide a clearer illustration of the existing conditions and proposed reconfiguration of Muni operations.

Comment

This figure does not illustrate the reduction in size of the terminal, or the proposed new circulation paths or layover location and capacity of buses within the new terminal very well. (page 87, Figure 6) *(MTA, Muni Service Planning. Letter, Comment No. 112)*

Response

DEIR Figure 6 has been revised as Figure C&R 1 on p. C&R-21 to provide a clearer depiction of the circulation at the Phelan Loop site as currently planned; however, at this time, design plans for the Phelan Loop site have not been finalized.

Comment

How does the selection of a p.m. peak period between 5:00 and 6:00 p.m. correspond to the (earlier?) traffic flows generated by CCSF. (page 163) *(MTA, Muni Service Planning. Letter, Comment No. 113)*

Response

The DEIR's transit assessment focuses on the potential impacts of the proposed project, which would consist primarily of people using the major commute lines. Traffic counts for the Transportation Study were collected from 4:00 to 6:00 PM. In general, traffic volumes between 5:00 and 6:00 PM were found to be the highest. The weekday PM peak hour was selected for analysis (consistent with the criteria established in the San Francisco Planning Department's *2002 Transportation Impact Analysis Guidelines for Environmental Review*) as it presents the worst-case traffic scenario for the study area.

CCSF is a special trip generator that has different ridership and activity characteristics than the Project land uses, and CCSF's peak use period does not correspond to the proposed project's peak use period, which occurs during the PM peak hour. CCSF's peak use period occurs during the midday, when ridership levels and Project trip generation is relatively low. The weekday PM commute peak hour (5:00 to 6:00 PM) may not correspond to the peak use period for CCSF, which is more likely to occur earlier in the afternoon; however, it is worth noting that general street traffic would be much lower during the peak use periods for CCSF, resulting in overall lower volumes than the PM peak hour, when both existing traffic levels and Project traffic levels would be at their highest. Were the Project to be analyzed during the CCSF peak use period earlier in the afternoon, the analysis would understate Project impacts, as background traffic levels and Project traffic levels would not be at their highest.

Comment

The 9X does not provide service to the Civic Center Area. The 91 Owl Service is not mentioned. (page 166) *(MTA, Muni Service Planning. Letter, Comment No. 114)*

Response

The 9X-Bayshore Express operates between Fisherman's Wharf and Balboa Park with stops in Chinatown and Downtown. While the 91-Owl line provides service to the Project Area, it was not described in the DEIR because it does not operate during peak commute periods when Project trip generation is at its highest.

Comment

The hours of Golden Gate Ferry Service to Larkspur are mentioned, but there is no discussion as to what kind of regional Service would be provided in the late evening and early morning hours …when the BART station is closed and the trains are not running. (page 167) *(MTA, Muni Service Planning. Letter, Comment No. 115)*

Response

In general, BART is operational between the hours of 4:00 AM and 1:00 AM. Other transit providers, such as Golden Gate Transit, operate during similar hours. Currently, the All Nighter bus service provides regional service from approximately 1:00 AM to 5:00 AM throughout Alameda, Contra Costa, San Francisco, and San Mateo Counties, generally shadowing other regional transit providers such as BART and Caltrain. The All Nighter is operated by five transit agencies: AC Transit, County Connection, Muni, SamTrans, and Wheels. Thus, no late night/early morning regional transit service is currently available for travelers between the Project Area and Marin County.

Comment

(page 167): Why does the transit analysis focus on "commuters" rather than a broader "person-movement-based performance measure" as suggested by Policy 5.1 in the Key Strategy section (page 248). *(MTA, Muni Service Planning. Letter, Comment No. 116)*

Response

The analysis of the proposed project used the transit analysis methodology and significance criteria adopted by the San Francisco Planning Department. Though various methods are available for examining a Project's overall effect on person-movement, these have not been formally adopted by the Planning Department.

Comment

Why does the transit analysis examine BART ridership on-board trains departing Civic Center (page 168), but not include information about passenger exits at the Balboa BART station itself? *(MTA, Muni Service Planning. Letter, Comment No. 117)*

Response

To properly assess the Project's effect on BART, system capacity was examined where existing and future BART ridership levels are at their highest and where Project ridership levels would be at their highest. Thus, the analysis of Project impacts on BART ridership levels focuses on trains departing Civic Center station, where ridership levels represent a worst-case scenario.

As discussed on p. 178 of the DEIR, the San Francisco Planning Department's standard transit analysis focuses on the ridership and capacity information at each line's maximum load point, which is the location along each route that has the highest capacity utilization. While the effects of exiting passengers were not quantitatively assessed, it is anticipated that conditions for pedestrians would not change substantially over baseline conditions due to overall growth in the Project Area.

Comment

Why does the analysis of transit conditions focuses on "commute access to and from the downtown area" (page 168) and the analyses excludes other major lines because they "do not carry as high a percentage of commuters." (page 168) What percentage of the total transit activity at this hub is represented by commuters traveling downtown? Recent studies indicate that Geneva is extremely important. *(MTA, Muni Service Planning. Letter, Comment No. 118)*

Response

Based on preliminary analyses using output from the San Francisco County Transportation Authority's travel demand model, it was determined that the majority of Project transit trips – approximately 65 percent – would travel to and from downtown San Francisco during peak hours. While the project would affect transit capacity of the routes

along Geneva Avenue (the 43-Masonic, 26-Valencia, 36-Teresita, and 54-Felton lines), these lines would general have lower ridership totals, and the addition of project trips would be unlikely to result in a significant impact on Muni operations. To provide a conservative analysis of project transit impacts, the analysis of Project transit trips were focused on the routes where project-generated trips are likely to be high – the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines, which serve the Balboa Park Station Area and Downtown San Francisco.

Comment

The statement "the majority of weekday evening commute transit trips to the Project Area may originate from origins in the downtown area" (page 168) should be annotated with its source.

(page B-3) The Existing Ridership figures in the Table b.2-3 Transit Capacity Utilization should have source information and date information. *(MTA, Muni Service Planning. Letter, Comment No. 120)*

Response

Information regarding the travel characteristics of existing Muni ridership was obtained from Muni's *Maximum Load Point Monitoring Data, 2003*, which was the base year for Muni data used by the San Francisco Planning Department for transit analysis.

Comment

It is not clear from this report how many people park their cars to access local and regional transit connections at Balboa Park. How much money would a regional BART commuter save by parking on-street at an uncontrolled location rather than a BART parking lot in San Mateo County? (page 168) *(MTA, Muni Service Planning. Letter, Comment No. 121)*

Response

As shown in C&R Table 3 on p. C&R-70, a BART commuter from the Peninsula would save between $3.60 and $4.50 per day in fares and parking fees by driving to Balboa Park and taking BART downtown.

TABLE C&R 3

Comparison of Daily BART Fares and Parking Fees from Peninsula Points

	Balboa Park BART	Daly City BART	Colma BART	South SF BART
Parking fee	**free**	**$2**	**$1**	**free**
Round-trip fare to Downtown SF	**$3.10**	**$5.60**	**$6.20**	**$6.70**
Parking fee and fare	**$3.10**	**$7.60**	**$7.20**	**$6.70**
Cost savings by parking at Balboa Park	**--**	**$4.50**	**$4.10**	**$3.60**

***Source*: BART, 2008.**

Comment

How much money would a student save by parking on-street at an uncontrolled location in the study area rather than in the CCSF reservoir parking lot? (page 168) *(MTA, Muni Service Planning. Letter, Comment No. 122)*

Response

The fee for CCSF students to park in a CCSF parking lot is $2 per day or $40 per semester.[8]

Comment

It would be helpful to include the analysis supporting the assertion about on-street parking demands and turnover rates on Ocean Avenue. (page 205) *(MTA, Muni Service Planning. Letter, Comment No. 123)*

Response

No parking surveys were performed; however, on-street parking operations were observed during the week of May 16, 2005 during the weekday mid-day period (generally between 1:00 and 3:00 PM) and weekday PM peak period (between 4:00 and 6:00 PM).

Comment

Are there any instances in the City where a "shared parking arrangement" proposed for the Kragen site works? (page 205) *(MTA, Muni Service Planning. Letter, Comment No. 124)*

Response

Shared parking arrangements are a common approach for mixed-use projects, as they reduce the overall area needed for parking, and reduce the costs of the proposed dwelling units. Most recent development projects have some form of shared parking arrangement, such as the Potrero at 450 Rhode Island, Mission Bay, and others. It is also worth noting that shared parking arrangements may reduce the demand for on-street parking spaces.

Comment

The relationship between various bus stop locations and the transit station entrances is not addressed. Midday pedestrian volumes associated with the CCSF class schedule (page 169) are mentioned in passing but the magnitude of this is neither adequately quantified nor described. *(MTA, Muni Service Planning. Letter, Comment No. 125)*

[8] CCSF Student Information Center, 8/25/08.

Response

In general, the Project would not negatively affect the configuration of the bus stops and station entrances. On weekdays, it is expected that the pedestrian activity associated with the Project would be relatively low during the midday, especially in comparison to the PM peak hour. Please see the response to Comment No. 113 on p. C&R-68.

Comment

The discussion of bicycle conditions excludes a discussion of the rails in the street within the study area.

What is the number of bicycle trips generated by CCSF (page 170)?

To what degree would these bicycle trips conflict with weekday commute trips? *(MTA, Muni Service Planning. Letter, Comment No. 126)*

Response

As noted in the comment, train tracks in the middle of the street can somewhat affect bicycle safety and access, as a bicycle tire can get caught in the separation between the tracks and the street can be uneven or bumpy. The number of bicycle trips and the associated impacts generated by CCSF are addressed in the *City College of San Francisco Master Plan EIR.*

Comment

What constitutes a "major bus line"? The 9X/AX/BX service is mentioned here, but the 2025 ridership on these lines are not included. (Table 14 on page 187). *(MTA, Muni Service Planning. Letter, Comment No. 127)*

Response

In general, the majority of Project transit trips would travel to and from Downtown San Francisco. The Muni lines considered most likely to carry Project transit trips would be the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines. Although it is likely that some percentage of Project transit trips would use less direct routes such as the 9X/AX/BX or the 43-Masonic, Project-related ridership increases would be minimal and would be unlikely to substantially affect their operations.

Comment

"Average annual growth rates for Muni lines that serve both the Project Area and downtown was established at about 0.25". (page 172) Does this mean that the 2025 growth projections were based on screenlines crossing radial transit routes between the downtown and the project area, or that the 2025 growth rate was only applied to radial routes between the downtown and the project area? *(MTA, Muni Service Planning. Letter, Comment No. 128)*

Response

Growth rates were developed for the major commute routes that were selected for analysis, including the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines. The growth rates do not include the non-commute rates that serve the Project Area, as they would have somewhat lower growth rates than the commute routes.

Comment

It is unclear how the aggregation of major bus lines and rail lines was performed. Were all of the links used by the 10 lines (page 166) that directly serve the project area included in the aggregated total? (page 172) *(MTA, Muni Service Planning. Letter, Comment No. 129)*

Response

Growth rates were developed only for the major existing and future commute routes, including the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines. The other cross-town lines were not included this calculation, as they would generally have a lower growth rate. This provides a conservative analysis of transit usage and impacts.

Comment

Was an average annual growth rates used for crosstown Muni lines the same as the radial lines that serve the Project Area and Downtown? *(MTA, Muni Service Planning. Letter, Comment No. 130)*

Response

Growth rates associated with the radial lines serving the Project Area and Downtown were not calculated, as these transit lines were not examined quantitatively in the DEIR. Based on model output, the growth rates for the cross-town lines would generally be lower than the commute routes. However, because it was estimated that a relatively low percentage of Project trips would use these lines, they only were assessed qualitatively.

Comment

Please note that Muni's web site has a new name, footnote 11 (page 172) should now be http://www.sfmta.com/cms/mthird/3rdover.htm In this same footnote, it is unclear which lines were used for the ridership estimates, and when the ridership information was collected in relation to the start-up of the Third Street T-Line. *(MTA, Muni Service Planning. Letter, Comment No. 131)*

Response

Comment noted. In general, the existing conditions assessment was conducted prior to data on the T-Third being available; thus, this information was not part of the DEIR's discussion of existing conditions. However, future model forecasts account for the

adjustments to the Muni system, and ridership estimates for these updated lines were considered when determining which Muni lines were to be used for the aggregated growth rates.

Comment

Why was the BART ridership model used to develop the BART ridership projections and not the SFCTA's? (page 172) Are BART's projections consistent with the SFCTA's projections?

Was the BART ridership model used to forecast the additional number of vehicles dropping passengers off or parking in the vicinity of the Balboa Park Station? (page 172) *(MTA, Muni Service Planning. Letter, Comment No. 132)*

Response

The additional number of vehicles dropping passengers off at the BART station was not specifically calculated as part of the transportation analysis. In general, the increase in potential park-and-riders for BART would be included in the traffic volume growth rate developed from the SFCTA model. However, they are anticipated to be a relatively low percentage of the Project's traffic and parking demand during the analysis period. For the purposes of providing as accurate as possible a calculation of BART system growth, BART's ridership model was used, as it focuses solely on the BART mode. However, it should be noted that during the analysis, values from BART's ridership model and the SFCTA model were compared and found to be relatively consistent.

Comment

Given the importance of this area as a transit hub, the analysis of transit impacts seems inappropriately limited to traditional "commute routes" and excludes the fact that CCSF is a special generator and that modal connections made in the project area to a variety of locations. (Table 14, pages 186-187) *(MTA, Muni Service Planning. Letter, Comment No. 133)*

Response

Please see the response to Comment No. 113 on p. C&R-68.

Comment

The discussion of project related transit impacts needs to explain why the analysis screen lines are over three miles away from the project and why the 29, 9X/9AX/9BX (or the former 15) routes have not been included. *(MTA, Muni Service Planning. Letter, Comment No. 134)*

Response

As discussed on p. 178 of the DEIR, the San Francisco Planning Department's standard transit analysis focuses on the ridership and capacity information at each line's maximum load point, which is the location along each route that has the highest capacity utilization. At other points along the route, ridership levels would be lower and therefore capacity

utilization would be lower. The Project's effect on each Muni line's maximum load point was determined, as this represented the Project's worst-case scenario for impacts to Muni lines.

In general, the majority of Project transit trips would travel to and from Downtown San Francisco. To provide a conservative analysis of Project transit impacts, Muni trips were assigned to the lines considered most likely to carry Project transit trips: the J-Church and K-Ingleside Metro lines and the 26-Valencia and 49-Van Ness bus lines.

Comment

The discussion of peak parking demand (on page 174) states that peak demand would be in the evening, but on page 169, there is a mention that in the vicinity of CCSF when classes are in session, parking spaces tend to be "completely full" (?) throughout the day. It would be helpful to have more quantitative information about existing parking demands that could support the assertion that the project parking demands are highest in the evening. (page 174) Have any CCSF 2025 parking demands been forecast into this document? *(MTA, Muni Service Planning. Letter, Comment No. 135)*

Response

Due to the residential nature of the Project Area, the Project's peak parking demand can be expected to occur during the evening. In general the Project's parking demand during the evening would be 15 percent higher than during midday. These rates are based on the parking data provided in the San Francisco Planning Department's *2002 Transportation Impact Analysis Guidelines for Environmental Review*.

Parking impacts associated with CCSF are specifically addressed in the *City College of San Francisco Master Plan EIR*.

Comment

It would be good to see an illustration of the condition where a truck longer than 30 ft tries to access the loading dock from Ocean Avenue. Would a 53' trailer be able to make this movement? (page 207)

Are there any other locations in the City where loading dock personnel are "stationed" at corners to assist truck maneuvers and manage traffic flows? (page 340)

Would the loading docks be designed to accommodate trucks with 53' trailers.

How would the movement of these trucks impact Muni vehicles? Is there a location where the trucks could layover while waiting for a dock? (page 177) *(MTA, Muni Service Planning. Letter, Comment No. 136)*

Response

The Kragen Auto Parts Site would be designed to accommodate 65-foot trucks, the standard maximum delivery truck length for a potential full service market.

Similar conditions of approval that would require loading dock personnel are under consideration at the proposed Whole Foods market at 690 Stanyan Street.

Truck turning templates for both 30-foot and 65-foot trucks are included in the appendix of the December 2006 Balboa Park Station Area Plan Transportation Study. As shown in those templates, 30-foot trucks would be able to maneuver into the loading areas without interrupting normal traffic conditions. The 65-foot trucks, on the other hand, would be unable to make a westbound right turn from Ocean Avenue without doing so from the center lane or requiring multiple turns, which would result in potential impacts to both traffic and transit operations. When possible, shorter trucks should be used. However, Project land uses such as supermarkets require the use of long trucks. Thus, the improvement measures listed on p. 340 of the DEIR would need to be implemented to improve conditions for traffic and transit.

Comment

According to the DEIR, the reconfiguration of the Phelan Loop terminal and the changes at the Ocean/Geneva/Phelan intersection would have a significant unavoidable impact on Muni Operations. How will this impact be mitigated? (page 182) *(MTA, Muni Service Planning. Letter, Comment No. 137)*

Response

As stated on p. 182 of the DEIR, no feasible mitigation measures have been identified to reduce this impact to a less-than-significant level. One method to eliminate this impact to Muni operations would be to forego the proposed changes; however, this would negate the proposed pedestrian improvements.

Comment

The Phelan Loop currently serves as a layover point for 9X, 9AX, 9BX and 49 Lines. The document indicates that “about 14 buses would depart the new loop site during the peak hour of operation. (page 198) Our records show that during an hour of Phelan Loops operations (6:20 pm to 7:20pm 10/3/07) up to 21 buses can leave depart the Phelan Loop, or more than one every three minutes. The discussion of the Phelan Loop operations (page 97) does not acknowledge that this loop facility serves as a terminal layover point for all the lines that use it. At this location, Muni buses layover for an average of just over 15 minutes. It should also be pointed out in this document that a Muni operator restroom is included in the terminal re-design. *(MTA, Muni Service Planning. Letter, Comment No. 138)*

Response

Comment noted. Please see the response to Comment No. 75 on p. C&R-47.

Comment

Why has an upstream signal on Phelan at the Reservoir driveway, or at the exit itself been excluded from this discussion? Such a control device (at a location described on page 85, illustrated in Figure 6 on page 86 or similar to the existing traffic control device described on page 188) could be designed to provide Muni coaches the gaps they need to exit the new terminal and a way to improve pedestrian safety.

Why would the Bus loop departure only be connected to the upstream pedestrian signal and not the intersection at Ocean Avenue and Phelan? (page 85, footnote 4) *(MTA, Muni Service Planning. Letter, Comment No. 139)*

Response

Please see the response to Comment No. 75 on p. C&R-47.

Comment

Given the stated Key Strategies (page 248) which seeks to assess performance based on person movements rather than vehicle movements, total transit passenger delays should be called out and quantified here. *(MTA, Muni Service Planning. Letter, Comment No. 140)*

Response

The transit analysis methodology and significance criteria used in the analysis of the Project is *2002 Transportation Impact Analysis Guidelines for Environmental Review*, adopted by the San Francisco Planning Department. Though various methods are available for examining a Project's overall effect on person-movement, the Planning Department has not formally adopted these for the analysis of significant project-generated impacts.

Comment

How come the reconfigured bus loop exit on Phelan where up to 20 buses an hour will be waiting to exit and enter traffic across a intersection recommended to be painted with a “Keep Clear” pavement marking is not part of this analysis? (page 257) *(MTA, Muni Service Planning. Letter, Comment No. 144)*

Response

Please see the response to Comment No. 104 on p. C&R-66. The calculations on p. 257 of the DEIR account for Muni buses at the Ocean/Phelan/Geneva Avenue intersection. It is worth noting that when the pedestrian signal at this intersection is not activated, southbound traffic would remain free to move; therefore, standard intersection analysis at this location may not be appropriate.

Comment

Comment 2:
The DEIR identifies peak hour transit trips on transit, with 589 daily trips on BART. BART is concerned that the number of trips assigned to BART may be too low. Data from the Metropolitan Transportation Commission study "Characteristics of Rail and Ferry Station Area Residents in the San Francisco Bay Area: Evidence from the 2000 Bay Area Travel Survey" suggests that for commute trips in San Francisco County, rail (BART, Caltrain and Muni Metro) and very small percentage of ferry is the travel mode for approximately 17% of work trips from residences within ½-mile of a BART station, while buses were used for 17% of work trips. The DEIR identifies the SFCTA Model as the source for the transit mode split data. This data likely does not reflect the travel patterns and preferences from individuals who would be moving to the neighborhood to take advantage of the high-density residential development proposed as part of the project. The assumptions made in this analysis could understate the impact on BART, resulting in a significant impact to BART. The proportion of transit trips on Muni and BART should be re-examined using peer-reviewed research on transit mode generation rates to verify the significance on BART and Muni. *(BART. Letter, Comment No. 147)*

Response

Please see the response to Comment No. 132 on p. C&R-75, which notes that values from BART's ridership model and the SFCTA model were found to be relatively consistent.

The analysis of Project impacts on BART is focused on ridership on southbound trains (i.e., towards the Balboa Park Station) at the Civic Center Station, a location where both general ridership and Project ridership is high.

The modal split characteristics for the Project Area are based on output from the San Francisco County Transportation Authority's travel demand model, which accounts for the modal split characteristics of existing residents and reflects the proposed land use changes and planned transit improvements for future scenarios. In general, the model shows that new residents would not have substantially different travel characteristics than neighboring existing residents; however, the provision of various improvements to non-auto modes would make non-auto travel a more attractive option for existing and future residents of the Project Area.

Overall, based on model output, it was determined that over 16 percent of total Project trips generated would use public transportation. Of this total, 85 percent are expected to use BART and 15 percent would use Muni. During the weekday PM peak hour, approximately 61 percent would travel inbound towards the Project Area. Approximately 61 percent of transit trips would travel inbound towards the Project Area during the PM peak hour.

Trips analyzed in Table 14 of the DEIR do not represent all transit trips generated by the proposed project but instead show the percentage of trips that would use BART and other transit providers as well as those who travel in other directions.

Additional detail regarding widening or adding escalators, platforms and stair channels, adding faregates and ticket vending machines, bicycle amenities, modifying air cooling and ventilation systems, and re-evaluating the ability of the emergency facilities to handle additional patrons should be addressed by further studies commissioned by BART for the Balboa Park station, as well as all BART stations; such analyses would be outside of the purview of this environmental document.

Comment

Comment 3:
The City of San Francisco's Transit First Policy, which applies to this project, favors modes that have the potential to provide the greatest mobility for people, rather than vehicles. BART is also seeking to encourage more patrons to access stations by walking, bicycling or on transit. Through its strategic planning process, the BART Board has developed several policies to guide and support station access near BART stations. The Strategic Plan seeks to achieve a 10 percent shift in access mode splits, by reducing the percentage of parked single occupancy vehicles (relative to other access modes). The BART Access Guidelines establish an access hierarchy that prioritizes investments in walk, transit and bicycle access to station areas. The BART Sustainability Policy has a goal to "(e)nhance the use of resource-efficient and environmentally-friendly access modes (e.g., bikes, walking, etc.), and other sustainable features at BART's new and existing stations." Finally, the BART Station Area Planning Policy has a goal to "(p)romote transit ridership and enhance quality of life by encouraging and supporting transit-oriented development within walking distance of BART Stations and along transit corridors that serve BART Stations." These policies and guidelines support investment in the facilities that encourage alternative modes of access to a station.

In this context, BART has concerns regarding how residents, visitors and employees of the proposed Area Plan will access the Balboa Park BART Station, both during peak and off-peak periods. For example, in the DEIR analysis, the roadway reconfiguration of the intersections and freeway ramps around station (i.e. single point urban interchange) is proposed to improve pedestrian conditions and to calm traffic. However, the analysis shows that the opposite will happen. The ramp intersections will all worsen to LOS D or F, which will further increase pedestrian and bicycle conflicts. As a result of this significant impact, we recommend that mitigation measures be identified to reduce these conflicts.

Furthermore, given the high demand for multi-modal access at this station, BART would like the City of San Francisco to work with BART to prioritized improved pedestrian and bicycle access to the station as attractive as drive alone or drop-off access. *(BART. Letter, Comment No. 148)*

Response

The DEIR on p. 120 addresses the Area Plan's consistency with the City's Transit First policy. The Area Plan includes various improvements to pedestrian and bicycle facilities that are likely to be used by people intending to ride Muni and BART. Pedestrian and bicycle improvements are incorporated into the planned interchange reconfiguration to ensure safe travel to and from the BART station for Project Area residents. While vehicular delay at off-ramps would increase, pedestrian operations would not necessarily be compromised.

As noted on p. 185 of the DEIR, feasible mitigation measures to address impacts resulting from the proposed consolidation of the off-ramps cannot be identified at the program level of analysis. Such reconfiguration would require additional design, review, analysis of alternative reconfigurations, and approval by City, State, and federal agencies.

Comment

Comment 4:
The DEIR analysis will help make critical decisions in meeting the needs of Muni and BART patrons in San Francisco and beyond. Moving a greater number of people through the Balboa Park Station during peak periods may require widening or adding escalators, platforms and stair channels; adding faregates and ticket vending machines; providing sufficient bicycle amenities, modifying air cooling and ventilation systems; and re-evaluating the ability of the emergency facilities to handle additional patrons.

For these reasons, BART recommends that the following information be provided as part of this analysis:
- Discussion and analysis of the existing mode split for auto, transit, pedestrians and bicycles with mode splits for 2025 with and without the Area Plan.
- Existing and projected 2025 ridership figures for
§ both southbound and northbound trains
§ during the weekday AM and PM Peak Hour
§ with and without the Area Plan *(BART. Letter, Comment No. 149)*

Response

Please see the response to Comment No. 147 on p. C&R-79.

Comment

Chapter III
Project Description
- Page 84, Figure 5. The diagram for the proposed transportation improvements at the BART station is difficult to understand. It would be helpful to include a diagram that clearly illustrates the existing and proposed roadway and transit changes (see page 106 of the Draft Balboa Park Station Area Plan). *(BART. Letter, Comment No. 151)*

Response

Figure 5 has been revised as Figure C&R 2 on p. C&R-22 to provide a clearer illustration of the existing transit conditions and proposed transit improvements. In addition, Figure 6 has been revised as Figure C&R 1 on p. C&R-21 to provide a clearer depiction of the proposed circulation at key Area Plan intersections.

Comment

Page 84, Figure 5. Please clarify as the status of the proposal for the M-line to terminate below the Upper Yard at the BART mezzanine. There was prior discussion to drop this concept for further consideration. Past analysis showed that there was not enough space to accommodate the extension of the Muni line and joint development of the Upper Yard parcel. This issue was raised in our September 5, 2006 comment letter on the Balboa Park Station Area Plan Initial Study. *(BART. Letter, Comment No. 152)*

Response

The Municipal Transportation Agency is currently in the process of reevaluating Muni operations in an effort to improve transit service as part of the Transit Effectiveness Project (TEP). Based on the findings of the TEP, it has been recommended that Muni's M-Ocean View line terminate at San Francisco State University rather than at the Balboa Park BART Station Upper Yard, and that Muni's J-Church line be extended to meet the M-Ocean View line at San Francisco State University. Revised Figure 5 (Figure C&R 2 on p. C&R-22) reflects these changes. Further analysis, environmental review, and approvals would be necessary to implement these changes.

The text in the DEIR (p. 9, last bullet) is revised as follows (new language is double underlined, while deleted language is shown in ~~strikethrough~~):

> The Muni Metro M-line would continue to end at the Balboa Park BART Station (Station), until development occurs on the Upper Yard site. ~~It would terminate at a new stop on the Upper Yard site, upon future development of the Upper Yard parcel~~ If the MTA plan goes forward, the M-line would terminate at San Francisco State University rather than at the Balboa Park BART Station Upper Yard. The Muni J-line would be extended to meet the M-line at San Francisco State University.

The text in the DEIR (p. 87, first bullet) is revised as follows (new language is double underlined, while deleted language is shown in ~~strikethrough~~):

> The Muni Metro M-line would continue to end at the Balboa Park BART Station until development occurs on the Upper Yard site. ~~It would terminate at a new stop on the Upper Yard site, upon future development of the Upper Yard~~ If the MTA plan goes forward, the M line would terminate at San Francisco State

University rather than at the Balboa Park BART Station Upper Yard. The Muni J-line would be extended to meet the M-line at San Francisco State University.

Comment

Page 87, Transit Facility Changes (ii). Muni light rail tracks and platforms would be constructed by Muni on Caltrans property, not Muni property. *(BART. Letter, Comment No. 153)*

Response

As noted in the comment, Muni light rail tracks and platforms would be constructed by Muni on Caltrans property.

Comment

Chapter IV
A. Land Use, Plans, and Policies
- Page 126, Bay Area Rapid Transit District (BART) Station Area Plans and Policies. This discussion should include a summary of our TOD Policy that was adopted in July 2005. Here is the link - http://www.bart.gov/docs/planning/BART%20TOD%20Policy.pdf. *(BART. Letter, Comment No. 155)*

Response

The following text is added to the DEIR after the third paragraph on p. 128:

BART's Transit-Oriented Development Policy

In response to federal, state, and regional policy to concentrate growth around transit, BART has developed transit-oriented development goals to (a) increase transit ridership and enhance quality of life at and around BART stations by encouraging and supporting high quality transit-oriented development within walking distance of BART stations, (b) increase transit-oriented development projects on and off BART property through creative planning and development partnerships with local communities, (c) enhance the stability of BART's financial base through the value capture strategies of transit-oriented development, and (d) reduce the access mode share of the automobile by enhancing multi-modal access to and from BART stations in partnership with communities and access providers.[9]

Comment

V. Mitigation Measures: Ocean Avenue/I-280 Northbound On-Ramp. This section proposes to stripe an excusive right-turn lane at the westbound approach in order to improve operating conditions to acceptable levels. Exclusive right-turn lanes can give motorist the mistaken impression that they have the right-of-way (ROW) over pedestrians. With that in mind, consider

[9]BART, Transit-Oriented Development Policy, http://www.bart.gov/docs/planning/BART%20TOD%20Policy.pdf, accessed August 8, 2008.

describing pedestrian safety counter measures to employ at the east-west crossing of this intersection. Examples include high-visibility crosswalks, channelizing the turn for trucks such that a pedestrian refuge island can be provided, or using striping to visually extend the northeast corner while accommodating trucks. (*Caltrans. Letter, Comment No. 158)*

Response

Please see the response to Comment No. 148 on p. C&R-79. All improvements proposed in the DEIR would be built to current Caltrans and City of San Francisco standards and would not be expected to introduce design features that are hazardous to pedestrians or motorists.

Comment

The reports document the project's potential impact on further traffic conditions. However, it needs to provide further description regarding San Francisco Municipal Transportation Agency's (MTA's) view on the proposed mitigation plans. It appears that none of the proposed mitigation measures can be deployed without MTA's approval. What would be the consequences or alternative mitigation, if MTA does not agree? (*Caltrans. Letter, Comment No. 159)*

Response

As two departments within the City and County of San Francisco, MTA and Planning have worked together in the development of the Balboa Park Station Area Plan and the transportation measures cited in the EIR. Any measures that are found to be infeasible or for which funding is not certain are determined to be significant and unavoidable.

Comment

The reports state that the plan proposes a single-point interchange that would consolidate the on- and off ramps at Geneva and Ocean Avenue so that there would be only one on- and off- ramp for each freeway direction. The report also states that the proposed change will result in the off-ramp operating at level of service (LOS) F and off-ramp queue backing up the I-280. The impact on the freeway system as a result of this queue needs to be evaluated, since this would significantly affect not only the off-ramp but also the entire freeway traffic approaching that off-ramp. It is likely that this will not only increase system-wide delay but also create safety issues. The report defers any analysis of the impacts to a subsequent environmental review & approval phase. If the interchange improvements are included as part of this plan, the impacts of the off-ramp queue and any mitigation need to be evaluated in this analysis. (*Caltrans. Letter, Comment No. 160)*

Response

Please see the response to Comment No. 148 on p. C&R-81.

Comment

Tables 2, 25, 20, 30, 33, and 37 show freeway ramp level of service and density, which are based on freeway counts taken from "2004 Traffic Volumes on the California State Highway System"' The count data in the referenced document does not have sufficient detail from which to derive peak period ramp or freeway density. Accordingly, the values shown in these tables are not meaningful and should be revised based on appropriate data. (*Caltrans. Letter, Comment No. 161)*

Response

All freeway ramp volumes were taken from Caltrans' *Ramp Volumes on the California State Freeway System* and adjusted for the p.m. peak hour using the Caltrans *Peak Hour Volume Data Report*, and not from Caltrans' *2004 Traffic Volumes on the California State Highway System* – as noted in the DEIR. Thus, the values shown in the tables accurately depict ramp volumes using the best data available and are appropriate for the purposes of determining Project impacts on freeway ramps. The results of the analysis remain unchanged.

6. NOISE

Comment

Would the residential project meet Title 24 noise insulation requirements if the windows on the dwelling units directly over the bus layover yard were opened? Would the windows be sealed above the yard? (page 220)

What would be the noise levels of the relocated yard if buses are required to turn off their engines during their fifteen minute layovers and use their compressed air starters in this layover area? (page 220) (*MTA, Muni Service Planning. Letter, Comment No. 141)*

Response

Title 24, Part 2 of the *California Code of Regulations* contains requirements for construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as California Noise Insulation Standards. For limiting noise transmitted between adjacent dwelling units, the Standards specify the extent to which walls, doors, and floor-ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the Standards set forth an interior standard of 45 dBA (CNEL or Ldn) in any habitable room with all doors and operable windows closed and require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to noise levels greater than 60 dBA (CNEL or Ldn). This requirement ensures that residents desiring a quiet interior environment have the option to close their windows and have interior noise levels of 45 dBA or less.

Noise levels generated by bus activities will need to be specifically addressed as part of a detailed acoustical analysis that is required under both Title 24 (as indicated above) and Mitigation Measure N-1 on page 331 of the DEIR. This analysis will consider proposed hourly and daily bus volumes, hours of bus operation, and bus operations (location, frequency, duration, and time of day when compressed air starters will be used). Further, it is entirely MTA's decision to allow residential use on its property. Consequently, MTA would be directly involved in implementing such noise mitigation in its project.

7. AIR QUALITY

Comment

It should be clarified who shall be responsible for the installation of the upgraded ventilation systems identified in AQ-2 and where exactly in the Phelan Loop Site they shall be located. We interpret this to mean the residential developer is responsible but it could also be interpreted that the MTA is responsible for installing filters at its facility. (page 46) (*MTA, Muni Service Planning. Letter, Comment No. 142)*

Response

The residential developer would be responsible for installing upgraded ventilation systems in each residential unit.

Comment

Is the Air Quality analysis of the Ocean Avenue/Geneva Avenue/Phelan intersection based on traffic volume changes alone? Are the rerouted Muni buses exiting Phelan accounted for in this analysis as trucks or vehicles alone? (page 257) (*MTA, Muni Service Planning. Letter, Comment No. 143)*

Response

Traffic volume changes at the Ocean/Geneva/Phelan intersection are consistent with changes presented in the traffic section of this EIR, which account for rerouting of Muni buses. As indicated on page 257 of the DEIR, Table 22 estimates worst-case CO concentrations and assumes that less than one percent of the traffic would be comprised of buses. Estimated traffic volumes at this intersection under all scenarios are higher than existing volumes, and bus volumes as a percentage of total traffic would be proportionately higher. In addition, CO emissions from a single bus are approximately two to three times the emissions from a single car. Given the small percentage of total traffic at this intersection that is comprised of buses, the difference in CO emissions at this intersection from the rerouted buses would not be significant.

Comment

Are there any existing locations in the region where residents have been provided with upgraded ventilation systems that "allow residents to close windows and ventilate/filter air mechanically"?

Is ventilating the same as filtering in this context? (page 260) (*MTA, Muni Service Planning. Letter, Comment No. 145)*

Response

In addition to future residential development within the Plan Area, use of upgraded ventilation systems in certain areas is a required mitigation in all Eastern Neighborhoods of San Francisco near freeways or busy streets. To provide more clarity about the design of these systems, Mitigation Measure AQ-2 has been replaced with Mitigation Measure G-2 of the *Eastern Neighborhoods Rezoning and Area Plans EIR*. It should also be noted that the Board of Supervisors is currently considering incorporating this mitigation approach into the City's Building and Health Codes.

The text in the DEIR (pp. 46 and 330, AQ-2) is revised as follows to clarify the mitigation measure (new language is double underlined, while deleted text is shown in ~~strikethrough~~). Revision of this mitigation measure would not change the conclusions reached in the DEIR and all impacts identified still remain the same.

> **AQ-2**: The following measure is included in the Area Plan: ~~Future residential development within 500 feet of: (1) the I-280 freeway, and (2) the proposed bus layover facility on the Phelan Loop Site shall be developed with upgraded ventilation systems to minimize exposure of future residents to odors and pollutant emissions. If any active recreation areas such as playgrounds are proposed as part of any future residential development in either of these areas, they should be located at least 500 feet from the I-280 freeway if feasible.~~ New residential development proposed in the following areas shall include an analysis of PM2.5 and shall, if warranted based on the results, incorporate upgraded ventilation systems to minimize exposure of future residents to PM2.5 (which includes DPM) and other pollutant emissions, as well as odors: (1) within 500 feet of the I-280 freeway; (2) adjacent to the proposed bus layover facility on the Phelan Loop Site; (3) any active recreation areas such as playgrounds that are proposed as part of any future residential development in either of these areas; and (4) any other location where total daily traffic volumes from all roadways within 500 feet of such location exceed 100,000 vehicles.
>
> The analysis shall employ either site-specific modeling of PM2.5 concentrations or other acceptable methodology to determine whether the annual average concentration of PM2.5 from the roadway sources within 500 feet would exceed the standard of 0.2 micrograms per cubic meter that has been shown to result in an increase of approximately 0.3 percent in non-injury mortality. If the incremental annual average concentration of PM2.5 concentration (from roadway sources only) were to exceed 0.2 micrograms per cubic meter at the project site, the project sponsor shall be required to install a filtered air supply system to maintain all residential units under positive pressure when windows are closed.

The ventilation system, whether a central HVAC (heating, ventilation and possibly air conditioning) or a unit-by-unit filtration system, shall include high-efficiency filters meeting minimum efficiency reporting value (MERV) 13, per American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). Air intake systems for HVAC shall be placed based on exposure modeling to minimize roadway air pollution sources. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology to minimize outdoor to indoor transmission of air pollution.

In addition to installation of air filtration, the project sponsor shall present a plan that ensures ongoing maintenance of the ventilation and filtration systems. The project sponsor shall also ensure that the following information is disclosed to buyers and renters: (1) the findings of the particulate matter analysis, and (2) instructions concerning the proper use of any installed air filtration. If active recreation areas such as playgrounds are proposed as part of any future residential development, such areas shall be located at least 500 feet from freeways, if feasible.

The above standard shall also apply to other sensitive uses such as schools, daycare facilities, and medical facilities. (It is noted that such facilities are somewhat more likely to employ central air systems than are residential developments.)

This modified measure does not raise significant new information; it merely clarifies and adds more detail to Mitigation Measure AQ-2.

8. HISTORIC ARCHITECTURAL RESOURCES

In response to the Landmark Preservation Advisory Board's (LPAB) comments, a memo was prepared by the City's Preservation team, dated September 9, 2008 and submitted to the Major Environmental Analysis division of the Planning Department. The memo is available for review as part of the project file, but also included as Attachment 4 of this C&R document.

Comment

The Board requested that the document include a description of the proposed historic district and that the DEIR fully describe the boundaries of the proposed district and that the district include the historic neighborhood theater as a contributor. (*Landmarks Preservation Advisory Board. Letter, Comment No. 5)*

Response

Based on the preliminary findings of the *Balboa Park Area Plan Historic Resource Survey*, the identified boundary of the potential Ocean Avenue Neighborhood

Commercial Historic District runs one parcel deep along Ocean Avenue from Lakewood Avenue to the west to San Jose Avenue to the East. The potential historic district includes the former El Rey movie theater, located on Ocean Avenue between Lakewood and Fairfield Avenues.

This boundary incorporates structures that exhibit integrity of both architectural style and setting in a manner that best provides a visual record of this commercial district during of the period of significance. Based on the preliminary findings of the Balboa Park Area Plan Historic Resource Survey, the period of significance for the potential Ocean Avenue Neighborhood Commercial Historic District is 1915-1940.

Comment

The Board further commented that the Carey and Co. ratings listed on the survey matrix needed to be backed-up with information that describes why certain buildings were found to be not historic. (*Landmarks Preservation Advisory Board. Letter, Comment No. 6)*

Response

Currently, a full Historic Resource Survey, Context Statement, and Design Guidelines for the potential Ocean Avenue Neighborhood Commercial Historic District are underway. The Carey and Company survey matrix on which the LPAB commented was based on a reconnaissance-level survey of the Balboa Park Station Area Plan. The boundaries of the potential Ocean Avenue Neighborhood Commercial Historic District have been adjusted based on information assembled through the research and preparation of the Historic Context Statement. As the Historic Context Statement is finalized, Department of Recreation and Parks (DPR) 523 D Historic District Form (D-Form) will include an appendix that identifies each structure that contributes to the historic significance of the overall district.

Comment

The Board suggested that there should be mitigation measures that address the need for the following: additional survey work, Ocean Avenue design guidelines, and the landmark designation of the fifteen individual buildings as well as the Ocean Avenue potential historic district. (*Landmarks Preservation Advisory Board. Letter, Comment No. 7)*

Response

As stated on p. 299 of the DEIR, the proposed Area Plan would have a significant unavoidable cumulative historic resource impact on the potential Ocean Avenue Neighborhood Commercial Historic District, and a less-than-significant impact on the potential Balboa Park Historic District and the Geneva Office Building, an identified historical resource within the Project Area. As described in the response to Comment No. 6 above, a full Historic Resource Survey, Context Statement, and Design Guidelines for the potential Ocean Avenue Neighborhood Commercial Historic District are currently

being prepared. As the Historic Context Statement is finalized, Department of Recreation and Parks (DPR) 523 D Historic District Form (D-Form) will include an appendix that identifies each structure that contributes to the historic significance of the overall district. In addition design guidelines will be incorporated into the Area Plan to reduce potential impacts to potential historic resources within the district.

Comment

Furthermore, the EIR should evaluate what the impact of the new height district will have on the potential historic district and individual resources and should provide alternatives as well as mitigation measures if impacts are found. (*Landmarks Preservation Advisory Board. Letter, Comment No. 8)*

Response

Please see the response to Comment No. 7 above. The No Project Alternative, as required by CEQA, is evaluated in the EIR. The No Project Alternative assumes that no changes proposed under the Plan would be made in the Project Area. As stated on pp. 353 and 354 of the DEIR, the No Project Alternative is likely to result in fewer potentially significant impacts to historical and archaeological resources in the Project Area than the proposed Area Plan, because of the reduced development associated with this alternative. However, unlike with the proposed Area Plan, the No Project Alternative could result in potentially significant impacts on the historic Geneva Office Building and Powerhouse.

Comment

Furthermore, the Board requested that the potential impacts of the height change have not been fully analyzed in the DEIR and that no alternatives have been presented. (*Landmarks Preservation Advisory Board. Letter, Comment No. 9)*

Response

Please see the responses to Comment No. 7 and 8 on p. C&R-89. The DEIR also states on p. 299 that impacts on potential individually significant resources would receive further project-level study and review to determine historic architectural impacts.

Comment

The Board feels that the proposed height change will have a significant adverse impact on the potential historic district. The Board believes the way to mitigate their concern is to lower the proposed height limit and to follow through with the historic resources survey. This should be followed up by the preparation of design guidelines that address the existing height limit. However, the Board feels that there may be an opportunity for adding height in certain locations. (*Landmarks Preservation Advisory Board. Letter, Comment No. 10)*

Response

Please see the response to Comment No. 7 and 8 on p. C&R-89.

Comment

The Board welcomes development that will meet the transit needs from outside of the district. The Board believes that it would be helpful if maps were included in the DEIR with the historic resources listed on the maps. (*Landmarks Preservation Advisory Board. Letter, Comment No. 11)*

Response

A map of the potential historic district along Ocean Avenue was included with the reconnaissance-level survey prepared by Carey and Company. This map is included as Figure C&R 3 on page C&R-92. As results of the more in-depth Historic Resource Survey are finalized, a new map will be prepared that identifies both the boundaries of the potential historic district and the location of structures that are located within the Plan Area and individually eligible for the California Register of Historic Places.

Comment

The Board believes that impacts analysis should take into consideration the economic and cultural impact of the loss of these buildings. The Landmarks Preservation Advisory Board appreciates the opportunity to participate in the review of this environmental document. (*Landmarks Preservation Advisory Board. Letter, Comment No. 12)*

Response

Impacts on historic architectural resources are discussed on pp. 290-299 of the DEIR. As stated on p. 296 of the DEIR, CEQA Guidelines Section 15064.5(b) establishes the criteria for assessing a significant environmental impact on historical resources. The criteria do not include the economic and cultural impacts of the loss of these buildings. The DEIR concludes on p. 299 that the proposed Area Plan would have a significant unavoidable cumulative impact on the potential Ocean Avenue Neighborhood Commercial Historic District, and a less-than-significant impact on the potential Balboa Park Historic District and the Geneva Office Building, an identified historical resource within the Project Area. In addition, the DEIR also states on p. 299 that impacts on potential individually significant resources would receive further project-level study and review to determine historic architectural impacts.

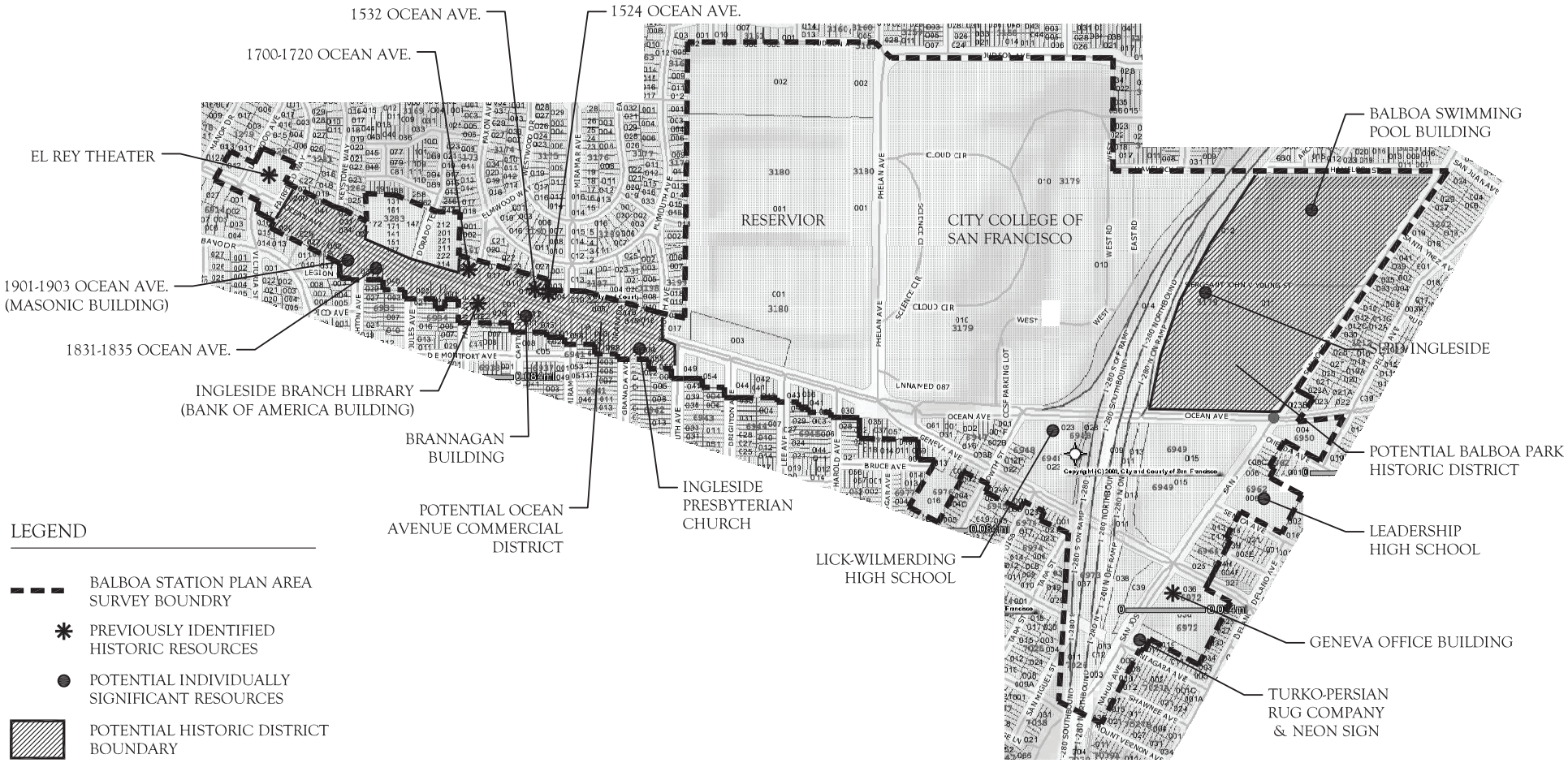

FIGURE C&R 3
Historic Resource Survey Area

Sources: Carey & Co. Inc., San Francisco Planning Department

9. MITIGATION AND IMPROVEMENT MEASURES

Comment

p. 342 Improvement Measures SM-1 is specifically applicable to the Kragen Site. It consists of subjective design guidelines for minimizing shadow impacts on publicly accessible open spaces not otherwise subject to Planning Code Section 295. See p. 342. Currently, none of the open spaces near the Kragen Site are subject to Section 295 because they are not owned by the Recreation and Park Department. This Improvement Measure should be deleted. (*Farella Braun + Martell LLP. Letter, Comment No. 26)*

Response

On p. 342 the DEIR states that the improvement measures "would be applicable to any development under the Area Plan, including specific development projects for the Phelan Loop and Kragen Auto Parts Sites, that could potentially affect publicly accessible open space not subject to Section 295 of the Planning Code." On p. 269, the DEIR states that "overall, the impact of shadow on Brighton Avenue open space, Reservoir site open space, and the Library open space as a result of the Phelan Loop Site and Kragen Auto Parts Site development projects would be less than significant." Improvement measures are actions or changes that would have a beneficial effect or would reduce effects of the proposed Area Plan that were found to have less-than-significant impacts. Unlike mitigation measures, improvement measures are not required. Improvement measures, however, may be required by decision makers as conditions of project approval.

Comment

P. 343 Improvement Measure WQ-1 requires "green stormwater technologies". What constitutes "green stormwater technologies"? Please state what green stormwater technologies could be included within this Improvement Measure. *(Farella Braun + Martell LLP. Letter, Comment No. 27)*

Response

Examples of green stormwater management technologies are discussed on p. 282 of the DEIR. Examples include swales and other infiltration methods, rainwater gardens, stormwater planters, green roofs, pervious concrete, green streets, new open space, and reducing the use of pipes, curbs and gutters.

The text in the DEIR (p. 58 last paragraph, and p. 343 WQ-1) is revised as follows to clarify Improvement Measure WQ-1 (new language is <u>double underlined</u>, while deleted text is shown in ~~strikethrough~~). Revision of this improvement measures would not change the conclusions reached in the DEIR and all impacts identified remain the same.

WQ-1: Green stormwater management technologies could be incorporated into proposed new open spaces in the Project Area. Examples of green stormwater technologies include swales and other infiltration methods, rainwater gardens, stormwater planters, green roofs, pervious concrete, green streets, new open space, and reducing the use of pipes, curbs and gutters. Incorporation of these green stormwater management technologies could further delay peak stormwater runoff flows and provide reduction of pollutants in the stormwater runoff discharged to the combined sewer system.

Comment

PP. 45, 329 In addition, the mitigation measure makes Avalon Bay financially responsible for all costs associated with the timing adjustment to the existing signalization. However, as the DEIR notes, there are other projects that would be developed during the applicable timeframe for this mitigation measure. See e.g., p. 99-Table 1, Tier 2 projects and p. 106. These projects will benefit from the adjustment to signalization timing paid for by Avalon Bay in 2008 by reducing their traffic impacts to less-than-significant levels. For this reason, at the end of the 2nd bullet of this mitigation measure at pp. 45 and 329 add: "Future projects contained in Tier 2 of Table 1, which rely on this DEIR or an Addendum to it for their CEQA approval, shall reimburse Avalon Bay or its successor for their proportionate share of costs incurred in maintaining the signalization timing to avoid left-turn queuing on Brighton Avenue based on the amount of vehicle trips from the project or some other indicia mutually agreed upon by the City, the project sponsor and Avalon Bay or its successor." *(Farella Braun + Martell LLP. Letter, Comment No. 20)*

Response

The Area Plan Tier 2 development projects listed in the DEIR in Table 1 and on p. 106 would not use Brighton Avenue for access from Ocean Avenue. The only Area Plan development site that would benefit from signalization improvement at the Brighton/Ocean intersection is the Kragen Auto Parts Site. As shown on Figure C&R 1 on p. C&R-21, drivers who intend to access the Phelan Loop Site, Reservoir, and Firehouse projects, as well as the City College campus, from Ocean Avenue would use Lee Avenue or Phelan Avenue. Development projects in the Transit Station Neighborhood and Ocean Avenue Neighborhood Commercial subareas also would not use Brighton Avenue for access. It is therefore appropriate that Avalon Bay or its successor be responsible for the full cost of the Ocean/Brighton intersection signalization mitigation measure cited in the DEIR on pp. 45 and 329.

Comment

PP. 330-331 We are concerned that some of the mitigation and improvement measures proposed for the Area Plan that would also be applicable to the Kragen Site lack specificity, making compliance with them difficult to achieve. (*Farella Braun + Martell LLP. Letter, Comment No. 21)*

Response

Pages 330–331 refers to Mitigation Measures AQ-1 and AQ-2. Mitigation Measure AQ-2 has been revised to provide more clarification. Please refer to the response to Comment No. 145 on page C&R-, which revises Mitigation Measure AQ-2.

Comment

PP. 330 Mitigation Measure AQ-2 requires "upgraded ventilation systems to minimize exposure of future residents to odors and pollutant emissions." There is, however no explanation of what would be a satisfactory "upgraded ventilation system." Would Title 24 compliance be sufficient? Are the studies required of Avalon Bay to determine the extent of "upgrade" required for ventilation systems? Please provide examples or references to what features, means or method would comply with the required "upgrades". (*Farella Braun + Martell LLP. Letter, Comment No. 22)*

Response

To provide more clarity about the upgraded ventilation systems required in Mitigation Measure AQ-2, this measure has been revised to be consistent with Mitigation Measure G-2 of the *Eastern Neighborhoods Rezoning and Area Plan EIR*. This revised measure clarifies the design of the upgraded ventilation systems. Please refer to the response to Comment No. 145 on page C&R-87, which revises Mitigation Measure AQ-2.

Comment

P. 331 Mitigation Measure N-1 requires that "needed noise reduction requirements be incorporated into new residential developments" when the CNEL exceeds 60 dBA. The DEIR concludes that the Kragen Site development would exceed this standard. See p. 220. If these undefined "noise reduction requirements" would be in addition to Title 24 compliance, what guidance or performance standard is there to determine what those measures would be? Please provide examples or references to what would features, means or methods would comply with the "noise reduction requirements." (*Farella Braun + Martell LLP. Letter, Comment No. 23)*

Response

Title 24 requirements apply to new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings where such units are proposed in areas subject to noise levels greater than 60 dBA (CNEL or Ldn). This requirement ensures that residents desiring a quiet interior environment have the option to close their windows and have interior noise levels of 45 dBA or less. In Mitigation Measure N-1, the San Francisco Land Use Compatibility Guidelines for Community Noise requires a detailed evaluation of noise reduction requirements be made by the project sponsor and needed noise reduction requirements are incorporated into the project design whenever new residential development is proposed in areas subject to existing or future noise levels over 60 dBA (CNEL). Therefore, compliance with Title 24 requirements for any new residential

development proposed at the Kragen Site would also fulfill requirements of Mitigation Measure N-1.

Comment

P. 331 Mitigation Measure N-2 requires that a vibration analysis be conducted for the Kragen Site. See Table 18, p. 224. What guidance or performance standards can be used to identify acceptable "measures…to reduce to potential for vibration disturbance"? Please provide examples or references to what would features, means or methods would be satisfactory ways to "reduce the potential for vibration disturbance." (*Farella Braun + Martell LLP. Letter, Comment No. 24)*

Response

Table 18 indicates critical distances from different types of transit, based on criteria outlined by the Federal Transit Administration (FTA). These distances not only account for ground-borne vibration levels likely to cause human annoyance or interference with use of vibration-sensitive equipment, but also add a 5-decibel factor of safety. These impact criteria, which can be used as performance standards, are outlined in Table 8-1 of FTA Guidelines (2006) and presented below in Table C&R 4 for reference:

TABLE C&R 4:

GROUND-BORNE VIBRATION (GBV) AND GROUND-BORNE NOISE (GBN) IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	GBV Impact Levels (VdB re 1 micro inch/sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interferer with interior operations	**65 VdB[4]**	**65 VdB[4]**	**65 VdB[4]**	**N/A[5]**	**N/A[5]**	**N/A[5]**
Category 2: Residences and buildings where people normally sleep.	**72 VdB**	**75 VdB**	**80 VdB**	**35 dBA**	**38 dBA**	**43 dBA**
Category 3: Institutional land uses with primarily daytime use.	**75 VdB**	**78 VdB**	**83 VdB**	**40 dBA**	**43 dBA**	**48 dBA**

***Notes*:**
[1] "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
[2] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
[3] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
[4] This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
[5] Vibration-sensitive equipment is not sensitive ground-borne noise.

Source: Federal Transit Administration, 2006.

The above-cited FTA Guidelines (2006) present a range of vibration control measures that apply to the rail source as well as receptor. Where new construction is involved, building design measures that could be considered include: (1) using trenches to control ground-borne vibration, analogous to controlling airborne noise with sound barriers; (2) placing the building foundation on elastomer pads similar to the bridge bearing pads; and (3) stiffening the floor on a portion of a building where vibration-sensitive equipment (e.g., electron microscopes) would be located and isolating the floor from the remainder of the building. When vibration from a rail source is a concern, vibration control measures may include implementation of an effective wheel and rail maintenance program, use of special track support systems, and operational changes (e.g., reducing vehicle speed, using equipment that generates the lowest vibration levels during the nighttime hours when people are most sensitive to vibration and noise, and adjusting nighttime schedules to minimize movements during the most sensitive hours).

Comment

Page 325: The title of this chapter should also include "improvement measures." For CEQA purposes, mitigation measures and improvement measures address very different issues. (*MTA. Letter, Comment No. 70)*

Response

This comment is acknowledged. The title of Chapter V in the DEIR (p. 325) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

V. MITIGATION AND IMPROVEMENT MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

Additionally the Table of Contents (p. i), and headers of pp. 326-343 are revised to reflect the updated chapter title.

Comment

Page 329, Mitigation Measure and Page 202 Traffic Impact: The traffic impact discussion on page 202 acknowledges that the impact at the intersection of Ocean Avenue and Brighton Street is significant since MTA has not reviewed the proposed signal timing changes. Page 329 assumes the impact on the same intersection as being mitigable. We recommend that since the proposed changes to signal timing at this intersection have not been reviewed by MTA, the EIR finds the impact as potentially significant under mitigation measures and for consistency. (*MTA. Letter, Comment No. 71)*

Response

The text in the DEIR (p. 45 and 329) is revised as follows to clarify and be consistent with the traffic impact discussion (new language is double underlined, while deleted text

is shown in ~~strikethrough~~). Revisions to the text does not change the conclusions reaches in the DEIR and all impacts identified remain the same.

> Level of Significance After Mitigation: This mitigation measure has been developed to reduce impacts related to the Kragen Auto Parts site to less-than significant levels by ensuring that the signal timing for the Ocean Avenue/Brighton Avenue intersection would be adjusted to provide a short protected left-turn green phase for westbound traffic. However, these measures are not included as part of the Area Plan adoption, as it is not certain whether the identified traffic measures are feasible and acceptable to the MTA. Therefore, this traffic impact would be considered a potentially significant impact. ~~Implementation of the above mitigation measure would reduce potential traffic impacts related to Kragen Auto Parts Site development to less-than-significant levels, by ensuring that the signal timing for the Ocean Avenue/Brighton Avenue intersection would be adjusted to provide a short protected left-turn green phase for westbound traffic.~~

Comment

P. 338 The Parking Improvement Measures do not expressly exempt the Kragen Site. The 2nd bullet under Parking on p. 338 states that "[e]fforts could be made to enhance…circulation, which would reduce the reliance upon private vehicles." We would request that this text be revised to be made inapplicable to the Kragen Site based on the following. The project site is being rezoned to NC-T. This zoning encourages the retail uses proposed for the Kragen Site. NC-T zoning permits up to 117 parking spaces for these retail uses, including up to 108 parking spaces for the 30,000 square-foot grocery store. Because this store will serve the neighborhoods surrounding Ocean Avenue (e.g., Glen Park and the Outer Mission), many patrons will need their own cars to get to the store and bring home their groceries. Requiring Avalon Bay to adopt measures to reduce reliance on private cars would effectively eliminate the retail activity at the grocery store, contrary to the Project Objectives for the Area Plan and for the Kragen Site. See pp. 74-75. In addition, if the on-site parking were reduced, the resulting residential and retail parking overflow would increase the competition for the limited on-street parking with the new library patrons and shoppers to the Ocean Avenue commercial uses. This outcome will also conflict with the Project Objectives that seek to "strengthen the economic base of the community by increasing neighborhood-serving retail and service businesses" and "increas[e] the community's supply of housing…". P.74 *(Farella Braun + Martell LLP. Letter, Comment No. 25)*

Response

Please see the response to Comment No. 14 on p. C&R-13. The parking controls in the proposed Ocean Avenue Neighborhood Commercial Transit (NC-T) District, as described in Planning Code Section 151.1, have changed slightly since publication of the DEIR. In addition, subsequent to submittal of the comment, the project sponsor reduced proposed parking for the Kragen Auto Parts Site. The Kragen Auto Parts Site project, as

currently proposed, would comply with the Ocean Avenue Neighborhood Commercial Transit (NC-T) parking maximums, and would meet the objectives of the Area Plan.

Comment

PP. 338-339 The bicycle Improvement Measures propose conditions that exceed the Planning Code. The text at p. 338 clearly says that although the Planning Code does not require the Kragen Site project to provide bicycle amenities for commercial uses, it should nonetheless: 1. Provide the Planning Code required shower and locker facilities (four showers and eight lockers); and, 2. Provide additional bicycle parking spaces for employees. Top of p.339, 1st and 2nd bullets. This text should be removed since the Planning Codes does not require bicycle amenities for the food market/retail uses. Through Avalon Bay's pre-leasing discussions, they have been told by potential large food and retail operators for the site that it is highly unlikely their employees would use these facilities, even if available. Additionally, because of the limited site area devoted to the grocery store, storage, delivery and sales space is a more necessary use than accommodating lockers and showers which will not be used. *(Farella Braun + Martell LLP. Letter, Comment No. 28)*

Response

The Area Plan's intent is to encourage alternative modes of transportation such as walking, biking, and public transit use. The DEIR identifies improvement measures to encourage biking as a way to help improve the area's traffic and parking conditions. Since the Kragen Auto Parts Site proposal is a transit-oriented development, it too should encourage biking by providing bicycle parking spaces and related facilities. The bicycle improvement measure was included to address the project's less-than-significant physical effects. Unlike mitigation measures, improvement measures are not required. Improvement measures, however, may be required by decision makers as conditions of project approval.

10. NON-CEQA RELATED ISSUES

Comment

Chapter VIII

Draft Distribution List

Page 366. This list contains many people who are no longer at that address / agency or have since passed away and should be updated. Hard copies of the marked up pages will be attached to this letter. (*BART. Letter, Comment No. 157*)

Response

This comment is acknowledged and the changes provided have been noted. This project has been ongoing since 2004 and the distribution list includes persons who requested to be notified but may no longer be at that address or agency. The standard MEA EIR

distribution list is updated monthly and the latest version is used for public notices. In the event that the person is no longer at a specific agency, notices are generally re-routed to the new agency contact. Any returned notices or documents from the U.S. Postal Service are noted in the project file for future distribution.

D. STAFF-INITIATED TEXT CHANGES

The following changes to the text of the Draft EIR are made in response to comments on the DEIR or are included to clarify the DEIR text. In each change, new language is double underlined, while deleted text is shown in ~~strikethrough~~, except where the text is indicated as entirely new, in which case no underlining is used for easier reading.

The text in the DEIR (p. 82) is revised as follows to reflect changes regarding the *San Francisco Bicycle Plan*:

> (iii) Redesign Ocean Avenue between San Jose Avenue and I-280 and between I-280 and Geneva Avenue, respectively (see Figure 4: Ocean Avenue and Phelan Avenue - Proposed Reconfigurations, on p. 83). Specific changes along these sections of the street include the following; however, the design of Ocean Avenue to accommodate bicycle lanes would be determined following completion of the *San Francisco Bicycle Plan EIR*, currently being prepared by MTA:
>
> (iv) Redesign Phelan Avenue between Judson and Ocean Avenues (see Figure 4). Specific changes along this section of the street include the following; however, the design of Phelan Avenue to accommodate bicycle lanes would be determined following completion of the *San Francisco Bicycle Plan EIR*, currently being prepared by MTA:

Urban design and architectural guidelines that are cited in the DEIR on pp. 90 through 93 have been slightly modified to conform to the standards of the *San Francisco General Plan*. These changes, itemized below, would not change the conclusions of the environmental analysis.

- Ground floor design guidelines (item iv on DEIR p. 91) would be further specified by type of street that the building faces.

The text in the DEIR (p. 92, fourth bullet under (B.1)) is revised as follows:

- Parking would be prohibited within 25 ~~30~~ feet of a sidewalk for parcels with over 25 feet of street frontage.

The text in the DEIR (p. 93, third and fifth bullets under (B.2)) is revised as follows:

- Requiring all ground floors to have at least ~~11~~12-foot clear ceiling heights.
- Requiring off-street parking, if provided, to be accessed via side streets or alleys. Off-street parking, including parking above the ground floor, would also be required to be set back at least 25~~30~~ feet from any street-facing property line.

Land use policies (DEIR p. 94) would change in that demolition of existing units that results in a net increase in housing units would be considered on a case-by-case basis (but not by means of a conditional use authorization). This process change would not change the conclusions of the environmental analysis.

The text in the DEIR (p. 112, the paragraph following "Balboa Reservoir Subarea,") is revised as follows to correct the description of the reservoir site:

> This 25-acre site is comprised of the South Reservoir (10.9 acres), owned by CCSF ~~the San Francisco Public Utilities Commission (SFPUC)~~, and the North Reservoir (14.1 acres), owned by ~~CCSF~~ the San Francisco Public Utilities Commission (SFPUC). The properties are separated by an eastwest berm (see Figure 1: Project Location, p. 72). The Balboa Park Station Area Plan estimates development that could occur in the Project Area over short-term (Tier 1 – 2010), long-term (Tier 2 – up to 2025), and potential future time-periods beyond 2025 (Tier 3). Tier 1 projects are unlikely to occur over the next two years, but rather over the full buildout period (2025). The Greenhouse Gas (GHG) emissions calculations provided in Attachment 2 of this document calculates GHG emissions for all three tiers, however it is noted that Tier 1 development is more likely to occur over the full buildout period.

The text in the DEIR (p. 258, third paragraph) is revised as follows to clarify the consideration of Tier 1 projects in the GHG emissions discussion (new language is double underlined, while deleted text is shown in ~~strikethrough~~).

> The project's incremental increases in GHG emissions associated with traffic increases, residential and commercial space heating, and increased energy demand would contribute to regional and global increases in GHG emissions and associated climate change effects. It should be noted that development of Tier 1 projects is not likely to reach full buildout by 2010, but rather is more likely to occur over the full buildout period (2025).

Updated language related to GHGs and AB32 has been developed by the Planning Department. The text in the DEIR (pp. 233-238) under the heading "Greenhouse Gases" is revised as follows:[10]

Greenhouse Gases

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities which alter the composition of the global atmosphere.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. The principal GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2), ozone, and water vapor. (Ozone—not directly emitted, but formed from other gases—in the troposphere, the lowest level of the earth's

[10] For readability, the new text is not further indented or double underlined.

atmosphere, also contributes to the retention of heat.) While the presence of the primary GHGs in the atmosphere are naturally occurring, CO2, CH4, and N2O are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide-equivalent" measures. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

The California Energy Commission (CEC) estimated that in 2004 California produced 500 million gross metric tons (about 550 million U.S. tons) of carbon dioxide-equivalent GHG emissions. The CEC found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent and industrial sources at 13 percent. In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of the Bay Area's GHG emissions, accounting for just over half of the Bay Area's 85 million tons of GHG emissions in 2002. Industrial and commercial sources were the second largest contributors of GHG emissions with about one-fourth of total emissions. Domestic sources (e.g., home water heaters, furnaces, etc.) account for about 11 percent of the Bay Area's GHG emissions, followed by power plants at 7 percent. Oil refining currently accounts for approximately 6 percent of the total Bay Area GHG emissions.

Statewide Actions

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emission of GHG would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the Act. CARB staff is preparing a scoping plan to meet the 2020 greenhouse gas reduction limits outlined in AB 32. In order to meet these goals, California must reduce their greenhouse gases by 30 percent below projected 2020 business as usual emissions levels, or about 10 percent from today's levels. In June 2008, CARB released their Draft Scoping Plan, which estimates a reduction of 169 million metric tons of CO2-eq (MMTCO2-eq). Approximately one-third of the emissions reductions strategies fall within the transportation sector and include the following: California Light-Duty Vehicle GHG standards, the Low Carbon Fuel Standard, Heavy-Duty Vehicle GHG emission reductions and energy efficiency, and medium and heavy-duty vehicle hybridization, high speed rail, and efficiency improvements in goods movement. These measures are expected to reduce GHG emissions by 60.2 MMTCO2-eq. Emissions from the electricity sector are expected to reduce another 49.7 MMTCO2-eq. Reductions from the electricity sector include building and appliance energy efficiency and conservation, increased combined heat and power, solar water heating (AB 1470), the renewable energy portfolio standard (33% renewable energy by 2020), and the existing million solar roofs program. Other reductions are expected from industrial sources, agriculture, forestry, recycling and waste, water, and emissions reductions from cap-and-trade programs. Local government actions and regional GHG targets are also expected to yield a reduction of 2 MMTCO2-eq. Measures that could become effective during implementation pertain to construction-related equipment and building and appliance energy efficiency. Some proposed measures will require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act (NEPA). Applicable measures that are ultimately adopted will become effective during implementation of proposed project and the proposed project could be subject to these requirements, depending on the proposed project's timeline.

Local Actions

San Francisco has a history of environmental protection policies and programs aimed at improving the quality of life for San Francisco's residents and reducing impacts on the environment. The following plans, policies and legislation demonstrate San Francisco's continued commitment to environmental protection.

Transit First Policy. In 1973 San Francisco instituted the Transit First Policy which added Section 16.102 to the City Charter with the goal of reducing the City's reliance on freeways and meeting transportation needs by emphasizing mass transportation. The Transit First Policy gives priority to public transit investments; adopts street capacity and parking policies to discourage increased automobile traffic; and encourages the use of transit, bicycling and walking rather than use of single-occupant vehicles.

San Francisco Sustainability Plan. In July 1997 the Board of Supervisors approved the Sustainability Plan for the City of San Francisco establishing sustainable development as a fundamental goal of municipal public policy.

The Electricity Resource Plan (Revised December 2002). San Francisco adopted the Electricity Resource Plan to help address growing environmental health concerns in San Francisco's southeast community, home of two power plants. The plan presents a framework for assuring a reliable, affordable, and renewable source of energy for the future of San Francisco.

The Climate Action Plan for San Francisco. In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution (Number 158-02) committing the City and County of San Francisco to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions. The Climate Action Plan provides the context of climate change in San Francisco and examines strategies to meet the 20 percent greenhouse gas reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress.

San Francisco Municipal Transportation Agency's Zero Emissions 2020 Plan. The SFMTA's Zero Emissions 2020 plan focuses on the purchase of cleaner transit buses including hybrid diesel-electric buses. Under this plan hybrid buses will replace the oldest diesel buses, some dating back to 1988. The hybrid buses emit 95 percent less particle matter (PM, or soot) than the buses they replace, the produce 40% less oxides of nitrogen (NOx), and they reduce greenhouse gases by 30 percent.

LEED® Silver for Municipal Buildings. In 2004, the City amended Chapter 7 of the Environment Code, requiring all new municipal construction and major renovation projects to achieve LEED® Silver Certification from the US Green Building Council.

Zero Waste. In 2004, the City of San Francisco committed to a goal of diverting 75 percent of its waste from landfills by 2010, with the ultimate goal of zero waste by 2020. San Francisco currently recovers 69 percent of discarded material.

Construction and Demolition Debris Recovery Ordinance. In 2006 the City of San Francisco adopted Ordinance No. 27-06, requiring all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65% of the material from landfills. This ordinance applies to all construction, demolition, and remodeling projects within the City.

Greenhouse Gas Reduction Ordinance. In May 2008, the City of San Francisco adopted an ordinance amending the San Francisco Environment Code to establish City greenhouse gas emission targets and departmental action plans, to authorize the Department of the Environment

to coordinate efforts to meet these targets, and to make environmental findings. The ordinance establishes the following greenhouse gas emission reduction limits for San Francisco and the target dates to achieve them:

- Determine 1990 City greenhouse gas emissions by 2008, the baseline level with reference to which target reductions are set;
- Reduce greenhouse gas emissions by 25 percent below 1990 levels by 2017;
- Reduce greenhouse gas emissions by 40 percent below 1990 levels by 2025; and
- Reduce greenhouse gas emissions by 80 percent below 1990 levels by 2050.

The ordinance also specifies requirements for City departments to prepare departmental Climate Action Plans that assess, and report to the Department of the Environment, GHG emissions associated with their department's activities and activities regulated by them, and prepare recommendations to reduce emissions. As part of this, the San Francisco Planning Department is required to: (1) update and amend the City's applicable General Plan elements to include the emissions reduction limits set forth in this ordinance and policies to achieve those targets; (2) consider a project's impact on the City's GHG reduction limits specified in this ordinance as part of its review under CEQA; and (3) work with other City departments to enhance the "transit first" policy to encourage a shift to sustainable modes of transportation thereby reducing emissions and helping to achieve the targets set forth by this ordinance.

Go Solar SF. On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched their "GoSolarSF" program to San Francisco's businesses and residents, offering incentives in the form of a rebate program that could pay for approximately half the cost of installation of a solar power system, and more to those qualifying as low-income residents.

City of San Francisco's Green Building Ordinance. On August 4, 2008, Mayor Gavin Newsom signed into law San Francisco's Green Building Ordinance for newly constructed residential and commercial buildings and renovations to existing buildings. The ordinance specifically requires newly constructed commercial buildings over 5,000 square feet (sq. ft.), residential buildings over 75 feet in height, and renovations on buildings over 25,000 sq. ft. to be subject to an unprecedented level of LEED® and green building certifications, which makes San Francisco the city with the most stringent green building requirements in the nation. Cumulative benefits of this ordinance includes reducing CO2 emissions by 60,000 tons, saving 220,000 megawatt hours of power, saving 100 million gallons of drinking water, reducing waste and storm water by 90 million gallons of water, reducing construction and demolition waste by 700 million pounds, increasing the valuations of recycled materials by $200 million, reducing automobile trips by 540,000, and increasing green power generation by 37,000 megawatt hours.

The Green Building Ordinance also continues San Francisco's efforts to reduce the City's greenhouse gas emissions to 20 percent below 1990 levels by the year 2012, a goal outlined in the City's 2004 Climate Action Plan. In addition, by reducing San Francisco's emissions, this

ordinance also furthers the State's efforts to reduce greenhouse gas emissions statewide as mandated by the California Global Warming Solutions Act of 2006.

Other City Ordinances

The City also has passed ordinances to reduce waste from retail and commercial operations. Ordinance 295-06, the Food Waste Reduction Ordinance, prohibits the use of polystyrene foam disposable food service ware and requires biodegradable/compostable or recyclable food service ware by restaurants, retail food vendors, City Departments and City contractors. Ordinance 81-07, the Plastic Bag Reduction Ordinance, requires stores located within the City and County of San Francisco to use compostable plastic, recyclable paper and/or reusable checkout bags.

The San Francisco Planning Department and Department of Building Inspection have also developed a streamlining process for Solar Photovoltaic (PV) Permits and priority permitting mechanisms for projects pursuing LEED® Gold Certification.

The City's Planning Code reflects the latest smart growth policies and includes: electric vehicle refueling stations in city parking garages, bicycle storage facilities for commercial and office buildings, and zoning that is supportive of high density mixed-use infill development. The City's more recent area plans, such as Rincon Hill, Market and Octavia, and Eastern Neighborhoods Area Plans, provide transit-oriented development policies. At the same time there is also a community-wide focus on ensuring San Francisco's neighborhoods as "livable" neighborhoods, including the Better Streets Plan that would improve streetscape policies throughout the City, the Transit Effectiveness Plan, that aims to improve transit service, and the Bicycle Plan, all of which promote alternative transportation options. Similarly, the Balboa Park Station Area Plan would help create a transit-oriented community. The City also provides incentives to City employees to use alternative commute modes and the City recently introduced legislation that would require almost all employers to have comparable programs.

Each of the policies and ordinances discussed above include measures that would decrease the amount of greenhouse gases emitted into the atmosphere and decrease San Francisco's overall contribution to climate change.

~~Gases that trap heat in the atmosphere are often called "greenhouse gases" (GHGs). Both natural processes and human activities emit GHGs.~~

~~Assembly Bill 32~~

~~In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emission of greenhouse gases (GHG) would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.~~

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

Greenhouse Gas Emissions Limits. AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the Act, as follows:

Publish a list of discrete early action GHG emission reduction measures June 30, 2007.

Establish a statewide GHG emissions cap for 2020, equivalent to the 1990 emissions level by January 1, 2008.

Adopt mandatory reporting rules for significant sources of GHGs by January 1, 2008.

Adopt a scoping plan by January 1, 2009, indicating how GHG emission reductions will be achieved from significant GHG sources via regulations, market-based compliance mechanisms and other actions, including the recommendation of a de minimus threshold for GHG emissions, below which emission reduction requirements would not apply.

Adopt regulations by January 1, 2011 to achieve the maximum technologically feasible and cost-effective reductions in GHGs, including provisions for using both market-based and alternative compliance mechanisms.

Establish January 1, 2012 as the date by which all regulations adopted prior to January 1, 2010 are to become operative (enforceable).

The CARB is proposing 37 "Early Action Measures" that are categorized into three groups; together, these measures will make a substantial contribution to the overall 2020 statewide GHG emission reduction goal of approximately 174 million metric tons of carbon dioxide equivalent gases. (As noted, the term "carbon dioxide-equivalent" is used to account for the differences in global warming potential among the six greenhouse gases.) These measures are summarized as follows:

Group 1 Three new GHG-only regulations were adopted June 21, 2007, to meet the narrow legal definition of "discrete early action GHG reduction measures": a low-carbon fuel standard, reduction of refrigerant losses from motor vehicle air conditioning system maintenance, and increased methane capture from landfills. These regulations are to take effect by January 1, 2010.

Group 2 The CARB is initiating work on 23 other GHG emission-reducing measures in the 2007 to 2009 time period with rulemaking to occur as soon as possible, where applicable. These GHG measures relate to the following sectors: agriculture, commercial, education, energy efficiency, fire suppression, forestry, oil and gas, and transportation.

Group 3 The CARB is initiating work on 10 conventional air pollution controls aimed at criteria and toxic air pollutants, but with concurrent climate co-benefits through reductions in carbon dioxide or non-Kyoto pollutants (i.e., diesel particulate matter, other light-absorbing compounds, and/or ozone precursors) that contribute to global warming.

None of the Group 1 measures specifically relate to construction or operation of new development within the Balboa Park Station Area Plan. Proposed Groups 2 and 3 measures that could become effective during implementation of the proposed Area Plan could pertain to construction-related equipment operations or the design of future development resulting from the Balboa Park Station Area Plan. In addition to approving the 37 GHG reduction strategies, CARB directed staff to further evaluate early action recommendations made at a June 2007 meeting. CARB staff has evaluated all 28 recommendations made during this meeting as well as recommendations from additional stakeholders. Their evaluation was published on September 7, 2007, and is presented in the Draft Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration. CARB staff is recommending a total of 44 discrete early action measures. Similar to the Group 2 and 3 early action measures, the additional early action measures could pertain to construction-related equipment operations or the design of future development in the Project Area. Some proposed early action measures will require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Applicable early action measures that are ultimately adopted will become effective during implementation of the Balboa Park Station Area Plan, and new development might be subject to these requirements, depending on their timing.

Of specific importance, the recent September 7, 2007 document expanding the list of Early Actions, as it relates to the Balboa Park Station Area Plan and CEQA, is a recommendation by the California Air Pollution Control Officers Association (CAPCOA) for CARB to develop guidance on approaches to the review of greenhouse gas impacts under CEQA, including GHG significance thresholds for projects, and to develop a process for capturing reductions that result from CEQA mitigations. However, this measure was not included in the expanded list of early action measures, as additional evaluation was determined to be needed. As of this date, there are no rules or regulations for determining significant sources of GHG emissions and there are no applicable facility-specific GHG emission limits or caps.

Climate Action Plan for San Francisco

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution (No. 158-02) committing the City and County of San Francisco to a greenhouse gas emissions reduction goal of 20 percent below 1990 levels by the year 2012. The resolution also directs the San Francisco Department of the Environment, the San Francisco Public Utilities Commission (SFPUC), and other appropriate City agencies to complete and coordinate an analysis and planning of a local action plan targeting GHG emission reduction activities. In September 2004, the San Francisco Department of the Environment and the SFPUC published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse

Emissions. The Climate Action Plan examines the causes of global climate change and human activities that contribute to global warming and provides projections of climate change impacts on California and San Francisco from recent scientific reports; presents estimates of San Francisco's baseline greenhouse gas emissions inventory and reduction targets; describes recommended emissions reduction actions in the key target sectors — transportation, energy efficiency, renewable energy, and solid waste management — to meet stated goals by 2012; and presents next steps required over the near term to implement the Plan.

The Climate Action Plan (the Plan) is based on the notion that human behavior accelerates climate change. The release into the atmosphere of carbon dioxide from burning fossil fuels in power plants, buildings and vehicles; the loss of carbon "sinks" due to deforestation; and methane emitted from landfills are the chief human causes of climate change. These emissions are referred to collectively as "greenhouse gases." The United States has the highest per capita emissions of GHGs in the world at 22 tons of carbon dioxide per person annually. California is the second largest greenhouse-gas polluting state in the nation, emitting two percent of global human-generated emissions, with the largest contribution of carbon dioxide from vehicle emissions.

The Climate Action Plan cites an array of potential environmental impacts to San Francisco, including rising sea levels which could threaten coastal wetlands, infrastructure, and property; increased storm activity that could increase beach erosion and cliff undercutting; warmer temperatures that could result in more frequent El Niño storms causing more rain than snow to the Sierras, reducing snow pack that is an important source of the region's water supply; decreased summer runoff and warming ocean temperatures that could affect salinity, water circulation, and nutrients in the Bay, potentially altering Bay ecosystems; as well as other possible effects to food supply and the viability of the state's agricultural and fisheries systems; possible public health effects related to degraded air quality and changes in disease vectors; as well as other social and economic impacts.

The Plan presents estimates of San Francisco's baseline GHG emissions inventory and reduction targets. It states that burning fossil fuels in vehicles and for energy use in buildings and facilities are the major contributors to San Francisco's GHG emissions; in 1990, these activities produced approximately 9.12 million tons of GHGs. In response to these potential effects, the Climate Action Plan seeks to reduce annual carbon dioxide emissions by 2.5 million tons by 2012, resulting in a reduction of 20 percent from 1990 emissions, by targeting emission reductions from burning fossil fuels in cars, power plants and commercial buildings, developing renewable energy technologies like solar, wind, fuel cells and tidal power, and expanding residential and commercial recycling programs. According to the Plan, achieving these goals will require the cooperation of a number of different city agencies.

Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions are now in progress. The City is already implementing a wide range of actions related to the

~~reduction of GHG emissions. Some of these actions are described below and additional actions are described in the Climate Action Plan.~~

~~Transportation. The San Francisco Board of Supervisors passed a Resolution No. 728-97 supporting increased Corporate Average Fuel Economy (CAFE) standards in the early 1990s. In 1999, the Board adopted the Healthy Air and Smog Prevention Act, which became Chapter 4 of the City's Environment Code. This ordinance requires that all new purchases or leases of passenger vehicles and light duty trucks by the City must either be rated as ultra-low emission vehicle (ULEV) or zero emission vehicles (ZEV) (at least 10 percent were to be ZEV by July 1, 2000). Requirements were also set forth for medium and heavy-duty vehicles and motorized equipment, and for phasing out all highly polluting vehicles and equipment.~~

~~The City has also contributed grant funds towards the development of three alternate fueling facilities. It continues to seek funds to expand alternate fueling infrastructure and has also been successful in developing a number of electric vehicle charging stations both in San Francisco and throughout the Bay Area. In addition, the City encourages car sharing. Several car sharing organizations in the City provide a community-wide solution to vehicle fleets. By providing a network of vehicles in locations around the city, available for reservation on an as-needed basis, residents can use small, fuel-efficient and electric vehicles and reduce car ownership. Car sharing is also available for use by businesses and public entities. The City requires the provision of car share parking spaces in large new residential buildings (Planning Code Section 166). The City also limits the amount of parking allowed in new downtown residential developments (Planning Code Section 151.1).~~

~~Solar and Energy Efficiency. San Francisco elected officials and voters have expressed strong support for renewable energy in several ways. The City funds municipal energy efficiency programs through a combination of the SFPUC's Hetch Hetchy Water and Power revenues, state grants and loans, and the City's General Fund at approximately $5.5 million annually. Alternative renewable energy funding mechanisms, which can take advantage of private investor incentives including the 30 percent federal tax credit and accelerated depreciation through acquisition of renewable power from Power Purchase Agreements, are currently being explored. In 2001, the City's Department of the Environment received $7.8 million of state funds to manage an energy efficient lighting retrofit program for small businesses in San Francisco. Also in 2001, the voters approved Propositions B and H. Proposition B authorized $100 million in revenue bonds to develop solar, wind and energy efficiency projects in City facilities and Proposition H authorized the City to issue revenue bonds for private sector as well as municipal projects.~~

~~City ordinances include the Green Building Ordinance for City Buildings, and Residential Energy Conservation Ordinance; and City energy policies include those such as set forth in the Energy Policy of the City's General Plan, the 1997 Sustainability Plan, and the 2002 Electricity Resource Plan. One of the goals of the Electricity Resource Plan is to maximize energy efficiency in San Francisco. The Plan recommends that the City "periodically review and set annual targets for increasing the efficiency of electricity use and the amount of electricity produced by renewable~~

~~sources of energy so that ultimately all of San Francisco's electricity needs are met with zero GHG emissions and minimal impacts on the environment." Increased energy efficiency goals included in the Climate Action Plan include 107 megawatts of electric demand reduction and 759 gigawatt-hours of energy efficiency by 2012.~~

~~The Department of the Environment is developing streamlined permitting and public information systems to pave the way for accelerated construction of solar in San Francisco for both hot water heating and electricity. Permit fees are being reduced and requirements standardized. The Department of the Environment is also promoting the integration of solar into the construction of new City facilities through its Green Building program. The SFPUC and the Department of the Environment are cooperating to implement the Generation Solar program to facilitate the installation of solar electric systems on residential and commercial rooftops in San Francisco.~~

A memorandum to address calculations of GHG emissions required by AB 32 and the latest Office of Planning and Technical Advisory is in Attachment 2 of the C&R. Based on the memo, the GHG impacts section in the DEIR (pp. 258-259) is revised as follows under the heading "Greenhouse Gas Emissions":[11]

Greenhouse Gas Emissions

Implementation of the proposed Balboa Park Station Area Plan would contribute to long-term increases in greenhouse gases (GHGs) as a result of traffic increases (mobile sources) and residential and commercial building heating (area sources), as well as indirectly, through electricity generation.

GHG emissions for on-road transportation, domestic and commercial heating, and energy generation represent the great majority of GHGs that would be produced in association with the proposed project. The proposed Area Plan contains no manufacturing and other heavy industry and no agriculture, and thus would generate little in the way of GHGs other than CO2. Even in the Bay Area as a whole, carbon dioxide makes up 90 percent of GHG emissions, measured in terms of CO2 equivalency, while methane and nitrous oxide emissions represent 4.5 and 5 percent, respectively, of GHG emissions.

Because transportation represents the largest sources of CO2 emissions in the Bay Area, on-road transportation sources (i.e., automobiles, trucks, and buses), would represent the largest source of GHG emissions within the proposed Area Plan as well. Electricity generation to serve new residential and commercial development resulting from implementation of the proposed Area Plan (both from in-state and out-of-state power plants) would also constitute a large portion GHG emissions.

The project's incremental increases in GHG emissions associated with traffic increases, residential and commercial space heating, and increased energy demand would contribute to regional and global increases in GHG emissions and associated climate change effects. While

[11] For readability, the new text is not further indented or double underlined.

San Francisco's population and businesses are expected to increase, overall projected water demand for San Francisco in 2030 is expected to decrease from current water demand due to improvements in plumbing code requirements and additional water conservation measures implemented by the San Francisco Pubic Utilities Commission (SFPUC). Given the anticipated degree of water conservation, GHG emissions associated with the transport and treatment of water usage would similarly decrease through 2030, and therefore increased GHG emissions from water usage is not expected.

Table 23: Summary of GHG (CO_2-Equivalents) Emissions (tons/year)

Analysis Scenario	Construction	Transportation	Heating & Hot Water	Electricity Consumption	Solid Waste	TOTAL
Kragen (2010)	194	5,532	579	989	304	7,598
Phelan (2010)	227	1,578	262	246	136	2,449
Tier 1[a] (2010)	606[b]	13,547	2,455	2,489	1,176	20,274
Tier 1 + Tier 2 (2025)	200	23,312	5,387	4,628	2,474	36,001

NOTE: Detailed calculation results by scenario are available for review as part of the project file at the San Francisco Planning Department, 1650 Mission Street, Fourth Floor.

[a] Includes Kragen & Phelan
[b] GHG emissions for Tier 1 are averaged over two years, and are considered conservatively high since it is unlikely that Tier 1 development would build out over the next two years (2010). Development of Tier 1 is more likely to occur over the full buildout period (2025) so that annual GHG construction emissions would be more similar to those estimated for the Tier 1 + Tier 2 scenario.

There are no adopted thresholds of significance for GHG emissions. The latest guidance from the Governor's Office of Planning and Research (OPR, June 19, 2008) acknowledges that lead agencies must formulate their own thresholds until statewide CEQA guidance is promulgated. The City and County of San Francisco considers a project to have a significant impact if it were to:

- Conflict with the state goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32 (California Global Warming Solutions Act of 2006), such that the project's GHG emissions would result in a substantial contribution to global climate change; and

- Conflict with San Francisco's Climate Action Plan such that it would impede implementation of the local greenhouse gas reduction goals established by San Francisco's Greenhouse Gas Reduction Ordinance.

Table 23 compares results from the GHG model for the four development scenarios analyzed. In accordance with AB 32, the Global Warming Solutions Act, California began implementing a statewide GHG emissions limit, which is designed to reduce emissions to 1990 levels by 2020. The 2020 GHG emissions limit for California, as adopted by CARB in December of 2007 is approximately 427 million metric tons of CO2-Equivalents. When compared to the statewide GHG emissions limit, GHG emissions associated with the Kragen and Phelan sites would represent 0.0018% and 0.0006%, respectively, of this 2020 limit. Implementation of the Tier 1 Scenario would generate GHG emissions equivalent to 0.0048% of this 2020 limit, while emissions associated with the Tier 1 + Tier 2 Scenario would represent 0.0084% of this 2020 limit. Within the Bay Area, GHG emissions associated with the Kragen and Phelan sites would represent 0.0087% and 0.0026%, respectively, of total GHG emissions estimated for the entire Bay Area (2002). Implementation of the Tier 1 Scenario would generate GHG emissions equivalent to 0.023% of the Bay Area total GHG emissions, while emissions associated with the Tier 1 + Tier 2 Scenario would represent 0.042% of the Bay Area total. Therefore, the proposed project would not generate sufficient emissions of GHGs to contribute considerably to the cumulative effects of GHG emissions such that it would impair the state's ability to implement AB32, nor would the proposed project conflict with San Francisco's local actions to reduce GHG emissions.

The OPR Technical Advisory (June 19, 2008) identifies five categories of GHG reduction measures that should be considered in future development:

1. Implement land use strategies that encourage use of alternatives to the single occupant vehicle or that optimize the efficiency of the existing transportation system.

2. Incorporate urban forestry into project designs to reduce heating/cooling loads and to sequester carbon,

3. Implement energy conservation programs in building design and promote alternative energy sources.

4. Reduce vehicle miles traveled through use of multi-occupant vehicles

5. Reduce solid waste generation and improve recycling rates.

There are additional GHG reduction measures outlined by CAPCOA (California Air Pollution Control Officers Association, CEQA and Climate Change, January 2008) as well as California Air Resources Board (CARB, Climate Change Draft Scoping Plan, June 2008). While these guidelines address GHG emissions from a wide array of stationary and mobile sources, guidelines relating to land use development emphasize locating new development appropriately to encourage use of alternative modes of transportation (including transit, walking, and bicycling) and incorporating energy conservation measures into building/development designs and expanding/strengthening existing energy efficiency programs. At present, buildings account for 30 percent of greenhouse gas emissions.

In addition to these guidelines, the State of California Attorney General's office has compiled a list of GHG reduction measures that could be applied to a diverse range of projects, including the following:

1. Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods.

2. Design buildings to be energy efficient, installing efficient lighting, light colored cool roofs, cool pavements, energy efficient heating and cooling systems, etc.

3. Reuse and recycle construction and demolition waste.

New construction within the Project Area will be required to incorporate energy efficiency measures, which would be consistent with the goals and policies as set forth in the City's Energy Policy of the General Plan, 1997 Sustainability Plan, 2002 Electricity Resource Plan, 2002 Climate Action Plan, and 2008 Greenhouse Gas Reduction Ordinance.

Through these plans and ordinances, San Francisco has been actively pursuing cleaner energy, transportation and solid waste policies. In an independent review of San Francisco's communitywide emissions it was reported that San Francisco has achieved a 5% reduction in communitywide greenhouse gas emissions below the Kyoto Protocol 1990 baseline levels. The 1997 Kyoto Protocol sets a greenhouse gas reduction target of 7% below 1990 levels by 2012. The "communitywide inventory" includes greenhouse gas emissions generated by San Francisco by residents, businesses, and commuters, as well as municipal operations. The inventory also includes emissions from both transportation sources and from building energy sources. Probable future greenhouse gas reductions will be realized by implementation of San Francisco's recently approved Green Building Ordinance. Additionally, the recommendations outlined in the Draft AB 32 Scoping Plan will likely realize major reductions in vehicle emissions.

The proposed Balboa Park Station Area Plan would fulfill all five of the above-listed OPR categories of GHG reduction measures and CAPCOA GHG reduction measures. The proposed Balboa Park Station Area Plan would encourage use of alternative transportation modes, which would help reduce transportation-related GHG emissions, relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available. In addition, GHG emissions increases from projected growth and development within the Project Area would be less than would result if this growth occurred in outlying areas of the air basin, where trip lengths would be longer. Moreover, the project's emphasis on creating relatively higher-density, mixed-use development patterns would be expected to make walking and other non-vehicular travel more viable than would be the case for similar population and employment growth in lower-density, single use neighborhoods elsewhere. Providing high density, transit oriented development to accommodate projected population demands reduces per capita GHG emissions by promoting alternative modes of transportation and providing employment opportunities within the neighborhood, thereby decreasing individual reliance on

motor-vehicles. Therefore, the proposed plan's transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco.

New construction within the Project Area will also be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, requirements of pertinent City ordinances such as the Residential Energy Conservation Ordinance, and emissions reduction actions included in the San Francisco Climate Action Plan, helping to reduce future energy demand as well as reduce the project's contribution to regional GHG emissions. In addition, new construction in the Project Area would be subject to requirements of the City's proposed Green Building Ordinance. Incorporation of energy efficiency measures into future Project-related development projects as part of these ordinance requirements would also be consistent with CAPCOA and CARB energy conservation guidelines.

As part of the City's Green Building Ordinance, future development within the Project Area would also be required to divert at least 75 percent of all construction and demolition material from landfills, a 10 percent increase from the City's Construction Demolition and Debris Recovery Ordinance (Ordinance No. 27-06). The construction material required to be diverted from landfills would be consistent with the Attorney General's guidelines for reusing and recycling construction and demolition waste, reducing solid waste generation and improving recycling rates. The Green Building Ordinance also requires new development to provide areas for recycling, composting and trash storage that is convenient for all users, further supporting the Department of the Environment's zero waste campaign.

The Balboa Park Station Area Plan also incorporates urban forestry designs. New construction, additions, or changes of use within most zoning districts in San Francisco (including the zoning districts within the Balboa Park Station Area Plan) must comply with Planning Code Section 143 which requires the owner or developer to install a minimum of one 15-gallon size street tree for every 20 feet of frontage of a property along a street or alley. Streets within the Balboa Park Station Area Plan would also be built to the standards outlined in the San Francisco Better Streets Plan. The Better Streets Plan includes urban forest guidelines that encourage planting of trees and understory vegetation within the urban streetscape. The guidelines consider the appropriate size and placement of trees, as well as appropriate species selection based on San Francisco's unique microclimates. Therefore, the Balboa Park Station Area Plan would incorporate urban forestry design elements that would incrementally reduce the heating/cooling loads and aid in carbon sequestration.

Thus, it can be fairly stated that GHG emissions related to the proposed Balboa Park Station Area Plan would likely be of lesser intensity than for residential and commercial development of comparable magnitude in a less dense, more sprawling environment. It can be stated with equal clarity that enhancements to transit service in the Project Area and vicinity, residential infill, and commercial development to provide employment opportunities near residential neighborhoods, would all combine to reduce GHG emissions that would otherwise be generated by increased vehicle travel. Given all the factors to minimize vehicle trip lengths and incorporate energy

efficiency measures as required by city mandates/ordinances, the proposed Balboa Park Station Area Plan would not conflict with the State's goals of reducing GHG emissions to 1990 levels by 2020, and the project's impact on GHG emissions would be less than significant. Furthermore, the proposed plan would not conflict with the City's ability to meet GHG reduction goals. Strategies, guidelines, and policies of the proposed Balboa Park Station Area Plan that would promote sustainability and reduction of GHGs include the following:

- Key Strategy of the Plan: Improve the functioning of Balboa Park Station as a regional transit hub so that it efficiently accommodates BART, Muni light rail and buses, bicycles, taxis, automobile drop-off and pick-up, and pedestrians.

- Key Strategy of the Plan: Re-design the Project Area streets, particularly main streets such as Geneva, Ocean, San Jose, and Phelan Avenues, to emphasize their multi-purpose character as pedestrian-friendly civic spaces and multi-modal movement corridors.

- Urban Design and Architectural Guidelines: Separating pedestrian traffic and vehicular traffic on busy streets; providing other street furniture, including… bicycle racks;

- Revision to Existing Policy: Introduce new transit-oriented, mixed-use development on opportunity sites in the Transit Station Neighborhood.

It should also be noted that the CARB Draft Scoping Plan includes a variety of other GHG reduction measures that will be implemented (e.g., clean car standards, Low Carbon Fuel Standard, etc.) and implementation of these statewide programs will ultimately reduce the project's transportation-related GHG emissions.

In summary, the proposed project would not contribute significantly, either individually or cumulatively, to global climate change given that: (1) implementation of the proposed Balboa Park Station Area Plan would not contribute significantly to global climate change such that it would impede the State's ability to meet its GHG reduction targets under AB 32, or impede San Francisco's ability to meet its GHG reduction targets under the Greenhouse Gas Reduction Ordinance; (2) San Francisco has implemented programs to reduce GHG emissions specific to new construction of residential and commercial development within the Project Area; (3) San Francisco's sustainable policies have resulted in the measured success of reduced GHG emissions levels; and (4) current and probable future state and local GHG reduction measures will continue to reduce contributions to climate change that would be associated with future development within the Project Area.

~~Implementation of the proposed Balboa Park Station Area Plan would contribute to long-term increases in greenhouse gases (GHGs) as a result of traffic increases (mobile sources) and residential and commercial building heating (area sources), as well as indirectly, through electricity generation.~~

~~GHG emissions for on-road transportation, domestic and commercial heating, and energy generation represent the great majority of GHGs that would be produced in association with the~~

project area. The proposed Area Plan contains no manufacturing and other heavy industry and no agriculture, and thus would generate little in the way of GHGs other than CO2. Even in the Bay Area as a whole, carbon dioxide makes up 90 percent of GHG emissions, measured in terms of CO2 equivalency, while methane and nitrous oxide emissions represent 4.5 and 5 percent, respectively, of GHG emissions.

Because transportation represents the largest sources of CO2 emissions in the Bay Area, on-road transportation sources (i.e., automobiles, trucks, and buses), would represent the largest source of GHG emissions within the proposed Area Plan as well. Electricity generation to serve new residential and commercial development resulting from implementation of the proposed Area Plan (both from in-state and out-of-state power plants) would also constitute a large portion GHG emissions.

The project's incremental increases in GHG emissions associated with traffic increases, residential and commercial space heating, and increased energy demand would contribute to regional and global increases in GHG emissions and associated climate change effects. Neither the BAAQMD nor any other agency has adopted significance criteria or methodologies for estimating a project's contribution of GHGs or evaluating its significance. However, the proposed Balboa Park Station Area Plan would encourage use of transit and alternative transportation modes, which could help reduce transportation-related GHG emissions, relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available. In addition, GHG emissions increases from projected growth and development within the Project Area could be less than would result if this growth occurred in outlying areas of the air basin, where trip lengths would be longer. Moreover, the project's emphasis on creating relatively higher-density, mixed-use development patterns would be expected to make walking and other non-vehicular travel more viable than would be the case for similar population and employment growth in lower-density, single-use neighborhood elsewhere. As discussed in Section B., Population, Housing and Employment (page IV.B.2) the Bay Area's population is projected to increase to approximately 810,700 by 2010 and 890,400 by 2025. Providing housing to accommodate the projected population increase is a critical need for the City. Providing high density, transit oriented development to accommodate projected population demands reduces per capita GHG emissions by promoting alternative modes of transportation and providing employment opportunities within the neighborhood, thereby decreasing individual reliance on motor vehicles.

New construction within the Project Area will also be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, requirements of pertinent City ordinances such as the Residential Energy Conservation Ordinance, and emissions reduction actions included in the San Francisco Climate Action Plan, helping to reduce future energy demand as well as reduce the project's contribution to regional GHG emissions.

Thus, it can be fairly stated that GHG emissions related to the proposed Balboa Park Station Area Plan would likely be of lesser intensity than for residential and commercial development of comparable magnitude in a less dense, more sprawling environment. It can be stated with equal

~~clarity that enhancements to transit service in the Project Area and vicinity, residential infill, and commercial development to provide employment opportunities near residential neighborhoods, would all combine to reduce GHG emissions that would otherwise be generated by increased vehicle travel. Given all the factors to minimize vehicle trip lengths and energy demand increases, the proposed Balboa Park Station Area Plan would not conflict with the State's goals of reducing GHG emissions to 1990 levels by 2020, and the project's impact on GHG emissions would be less than significant.~~

The table numbers in the DEIR (Tables 23 through 31) are revised accordingly as a result of the addition of a new Table 23 in the GHG text.

The text in the DEIR (p. 432) is revised as follows to include a new reference under the heading "Noise" and after Federal Transit Administration:

FTA, 2006. Federal Transit Administration Guidelines.

The text in the DEIR (pp. 432 and 433) is revised as follows to include new references under the heating "Air Quality":

California Air Pollution Contol Officer's Association, *CEQA and Climate Change*, January 2008, Accessed on April 15, 2008. http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf

State of California, Department of Justice, *The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level* Updated 3/11/08, Accessed on April 11, 2008. http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf

U.S. Green Building Council, *Why Build Green?*, Accessed on September 17, 2007: http://www.usgbc.org/DisplayPage.aspx?CMSPageID=291

The text in the DEIR (p. 438) is revised as follows to include a new heading and reference:

TRANSPORTATION

Bay Area Rapid Transit (BART), 2008. Transit-Oriented Development Policy, http://www.bart.gov/docs/planning/BART%20TOD%20Policy.pdf. Accessed August 8, 2008.

City College San Francisco, 2008. Student Information Center. 8/25/08.

San Francisco Municipal Transportation Agency (MTA), 2002. A Vision for Rapid Transit in San Francisco. Available at http://www.sfmta.com/cms/rprinit/visindx.htm. Accessed August 8, 2008.

MTA, 2008. FY2008-2027 Draft Short Range Transit Plan. Available at http://www.sfmta.com/cms/rsrtp/srtpindx.htm#fy2008. Accessed August 8, 2008.

The text in the DEIR (p. 430) under the heading "EIR Authors" is revised follows:

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, California 94103

Environmental Review Officer:	Paul Maltzer
EIR Coordinator:	Rick Cooper
Acting Environmental Review Officer and Transportation Planner:	Bill Wycko
Planner:	Jeanie Poling
Planner:	Jessica Range

The text in the DEIR (p. 430) under the heading "EIR Consultants" is revised as follows after "Turnstone Consulting":

EDAW
150 Chestnut Street
San Francisco, California 94111

Principal in Charge:	Mark Winsor
Project Manager:	Tammy Chan
Environmental Planner:	Susan Yogi

The text in the DEIR (p. 431) for "Korve Engineering" is revised as follows:

DMJM Harris (formerly Korve Engineering)
155 Grand Avenue, Suite 700
Oakland, California 94612

(Transportation)	Bill Burton, PE
	Timothy Erney, AICP
	Ryan Cordero Niblock

The text in the DEIR (p. 431) under the heading "Project Sponsor" is revised as follows:

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, California 94103

Ken Rich, Plan Manager
Joshua Switzky, Planner
Kate McGee, Planner
Gary Chen, Graphic Artist

The text in the DEIR (p. 14, third bullet) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~).

- The Geneva Office Building and Powerhouse is Recreation and Park Department property. The Area Plan anticipates development of about 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses in this building.

The text in the DEIR (p. 99, Table 1) is revised as follows:

Table 1: Balboa Park Station Area Plan Three-Tier[1] Revised Land Use Program

Development Site	Residential Units (No. of Units)	Commercial Use (Sq. Ft.)	Cultural/Institutional Use (Sq. Ft.)	Open Space (Sq. Ft.)
Tier 1 (0-5 years)				
Upper Yard[2]	200	10,000	0	TBD[3]
Phelan Loop[4]	80	15,000	0	25,000
Kragen Auto[5]	175	35,000	0	4,300
Sunset Garage	0	0	7,000	TBD
Geneva Office Bldg	0	0	15,853~~12,000~~	TBD
Ocean Avenue Infill[6]	135	11,620	0	TBD
San Jose Avenue Infill in Station Area[6]	200	3,120	0	TBD
Tier 1 Total	**790**	**74,740**	**22,853 ~~19,000~~**	**29,300**[7]
Tier 2 (5-20 years)				
Firehouse[8]	80	10,000	0	0
Ocean Avenue Infill	330	19,880	0	0
San Jose Avenue Infill in Station Area	80	0	0	0
Reservoir[9]	500	0	0	100,000
Tier 2 Total	**990**	**29,880**	**0**	**100,000**
Tier 3 (20 years +)	**SPECULATIVE**[10]			

Notes:
[1] Tier 1 (0-5 years) = Short-term development.
Tier 2 (5-20 years) = Long-term development.
Tier 3 (beyond 20 years) = Speculative development.
[2] Site access from San Jose Avenue.
[3] TBD = To be determined, depending on size of development proposed.
[4] Site access from Lee Avenue.
[5] Two buildings with residential use above ground-floor retail to be developed on the Kragen Auto Parts Site. Up to ~~About~~ 30,000 sq. ft. of proposed retail would be a food market; the remaining up to 5,000 sq. ft would be other neighborhood-serving retail. Brighton, Harold, and Lee Avenues would be extended north at least for the length of the proposed development. Vehicular access to the residential uses would be from Brighton Avenue~~ and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses would be from Brighton Avenue, and vehicular egress from the non-residential uses would be onto Lee Avenue.
[6] Residential units in Ocean Avenue Infill do not have specific locations. About 40 units and a small amount of retail could be at the Donut Shop site, part of San Jose Avenue infill.
[7] Tier 1 Total Open Space sq. ft. may be more than 29,300 sq. ft. and up to about 40,000 sq. ft., depending on the amount of development proposed.
[8] The firehouse site would be developed only if the fire station were relocated to another site with the approval of the San Francisco Fire Department.
[9] City College controls 40% and SFPUC controls 60% of the reservoir site, respectively.
[10] Tier 3 development may occur beyond the year 2025. It is considered to be too speculative in nature to analyze in the EIR's 20-year time frame, through 2025.

The text in the DEIR (p. 105, third bullet) is revised as follows:

- The Geneva Office Building and Powerhouse is a vacant landmark building. It is Recreation and Park Department property. The Area Plan anticipates development of about 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses in this building, including an arts center for youth.

The text in the DEIR (p. 132, last paragraph, third sentence) is revised as follows. The number of housing units is also revised to state 615 units to be consistent with Table 3.

Potential development in this subarea includes approximately ~~500~~615 housing units, 24,740 sq. ft of commercial space, and 15,853 ~~12,000~~ sq. ft. of cultural/institutional uses (see Table 3 for proposed land use changes by subarea).

The text in the DEIR (p. 133, Table 3) is revised as follows:

Table 3: Balboa Park Station Area Plan - Summary of Land Use Changes by Subarea (by 2025)

Subarea / Site	Existing Land Use Description	Proposed Land Use				Tier [1]
		Residential (No. of Units)	Commercial (Sq. Ft.)	Cultural (Sq. Ft.)	Open Space [2] (Sq. Ft.)	
Transit Station Neighborhood Subarea						
Muni Upper Yard	Light rail maintenance/storage facility	200	10,000	0	TBD [3]	1
Donut Shop Property	Coffee shop with surface parking lot	40	TBD	0	TBD [3]	1
Geneva Office Building	Vacant Landmark Building	0	0	15,853~~12,000~~	TBD [3]	1
Ocean Avenue Infill	Potential opportunity sites	95	11,620	0	TBD [3]	1
San Jose Avenue Infill	Potential opportunity sites	280	3,120	0	TBD [3]	1, 2
Subarea Total		**615**	**24,740**	**15,853~~12,000~~**	**TBD** [3]	
Ocean Avenue Neighborhood Commercial District Subarea						
Phelan Loop	Muni bus turnaround	80	15,000	0	25,000	1
Kragen Auto Parts	Retail auto parts store	175	35,000	0	4,300	1
Sunset Garage	Vacant (site of proposed Ingleside Library)	0	0	7,000	0	1
Firehouse	SF Fire Department fire station	80	10,000	0	0	2
Ocean Avenue Infill	Potential opportunity sites	330	19,880	0	0	2
Subarea Total		**665**	**79,880**	**7,000**	**29,300**	
City College Subarea [4]	Academic uses, recreation, and parking					
Balboa Reservoir Subarea						
SFPUC Reservoir Property (reconfigured western portion)	CCSF student parking	**500**	0	0	**100,000**	**2**
Total Area Plan Development		**1,780**	**104,620**	**22,853~~19,000~~**	**129,300**	

Notes:

[1] The Development Program is phased by Tiers, based on when proposed development could occur. Tier 1 is short term development expected to occur within five years or by 2010; Tier 2 is long term, expected to occur between 5-20 years or by 2025.

[2] Includes open space associated with specific development sites. Does not include publicly accessible open space plazas, playgrounds, and neighborhood parks planned for the Transit Station Neighborhood and Ocean Avenue Neighborhood Commercial District subareas.

[3] The amount of required open space that would be provided for these sites cannot be determined until specific development projects are proposed.

[4] No development is assumed for the City College subarea. The Area Plan includes street network changes to improve access to City College.

Source: Balboa Park Station Area Plan Land Use Program; p. 48; San Francisco Planning Department; Pittman & Associates.

The text in the DEIR (p. 76, first bullet) is revised as follows to clarify the objective of the Kragen Auto Parts Site Development (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> Support the City's efforts to generate additional market-rate and affordable rental housing units as required by Planning Code Section 315, the City's Inclusionary Housing Ordinance;

The text in the DEIR has been revised and described below to clarify and provide consistency regarding the description of square footage and number of parking spaces. The text in the DEIR (item number 6 on pp. 12 and 98) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> 6. No minimum amount of parking would be required for new commercial/institutional uses. A maximum of one off-street parking space per 1,500~~500~~ sq. ft. of occupied space would be permitted for commercial uses, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft, and, with conditional use authorization, one space per 250 sq. ft. of occupied space in excess of 20,000 sq. ft.

The text in the DEIR (p. 13, fourth paragraph, second through last sentences) is revised as follows:

> The site is proposed to be developed with ~~approximately~~ up to 175 residential units above ~~approximately~~ up to 35,000-sq.-ft. of ground-floor retail uses. The retail uses would include up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail spaces. The development would also include about 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed at this site. The Kragen Auto Parts Site development would meet the proposed off-street parking standards for the new NC-T District of a maximum of one parking space for each residential unit; therefore, the development ~~would~~could include up to 175 residential parking spaces. The parking standards for new ~~retail~~non-residential uses in an NC-T District would permit a maximum of one space per ~~500~~ 1,500 sq. ft. of occupiable space, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted to have one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 sq. ft. of occupiable space in excess of 20,000 sq. ft. The development could therefore include a maximum of ~~117~~ 83 parking spaces for the retail uses. As currently proposed, the development at Kragen Auto Parts Site would include a total of up to 258 ~~281~~ off-street parking spaces, including ~~173~~175 spaces for the residential units, ~~and 106~~ 80 spaces for the food market, and three spaces for the other retail. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 28) under the heading "Parking Impacts" is revised as follows:

> Parking Impacts
>
> The Kragen Auto Parts Site development would have a peak weekday evening parking demand for 227 residential parking spaces and 170 food market/retail parking spaces. This development would meet the current Planning Code requirements for the provision of off-street parking spaces, as well as accessory parking provisions for commercial parking. ~~With the proposed 281 spaces, this development would have a parking shortfall of 116 spaces. With the proposed Planning Code changes as part of the Area Plan,~~ The development would provide up to a maximum of ~~292~~263 spaces, including 175 residential spaces, ~~nine retail spaces, and~~ up to ~~108~~80 food market spaces, up to three other retail spaces, and five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces). The project would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155. If this amount of parking was supplied, the development would have a parking shortfall of ~~93~~134 spaces. Improvement measures to reduce the effect of the parking shortfall from this site development are included in Chapter V, Mitigation Measures.

The text in the DEIR (p. 99, Footnote 5) is revised as follows and also reflected in Table 1 edits on p. C&R-9:

> [5] Two buildings with residential use above ground-floor retail to be developed on the Kragen Auto Parts Site. Up to ~~About~~ 30,000 sq. ft. of proposed retail would be a food market; the remaining up to 5,000 sq. ft would be other neighborhood-serving retail. Brighton, Harold, and Lee Avenues would be extended north at least for the length of the proposed development. Vehicular access to the residential uses would be from Brighton Avenue ~~and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses would be from Brighton Avenue, and vehicular egress from the non-residential uses would be onto Lee Avenue.

The text in the DEIR (p. 100, item (iii)) is revised as follows:

> Development on the Kragen Auto Parts Site would include approximately 15 more residential units and about 18,355 sq. ft. more of commercial use.

The text in the DEIR (p. 103) is revised as follows:

> The Kragen Auto Parts Site is privately owned and it is the largest individual site in the Ocean Avenue Neighborhood Commercial District subarea. The site, currently in an NC-2 zoning district, would be rezoned to the new NC-T zoning designation. The Area Plan identifies the development of up to ~~approximately~~ 175 residential units above up to ~~approximately~~ 35,000-sq.-ft. of ground-floor retail uses. The proposed retail uses would include up to a 30,000-sq.-ft. food

market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail spaces. (See Figure 10: Proposed Development at Phelan Loop Site and Kragen Auto Parts Site.) The development would also include about 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed on this property.

The Kragen Auto Parts Site development would meet the proposed off-street parking standards for the new NC-T District. A maximum of one parking space would be permitted for each residential unit in the NC-T District; therefore, the development could include a maximum of 175 residential parking spaces. The parking standards for new retail uses in an NC-T District would permit a maximum of one space per 1,500 ~~500~~ sq. ft. of occupiable space, with the exception that ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be permitted to have one off-street parking space per 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 sq. ft. of occupiable space. The development could therefore include a maximum of ~~117~~83 parking spaces for the retail uses, including the food market.[12]

As currently proposed, the Kragen Auto Parts Site development would include up to 263~~a total of 281~~ off-street parking spaces~~,~~ – 175 spaces for the residential units, ~~and 106~~83 spaces for the food market and other proposed retail uses, and five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces). The project would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155. ~~About 11 of the total proposed parking spaces would be handicapped-accessible. The Kragen Auto Parts Site development would also be required to meet the car-share requirements under Planning Code Section 166. Accordingly, the development would provide one car share space.~~

The text in the DEIR (p. 136, second paragraph) is revised as follows:

The Kragen Auto Parts Site would be developed with ~~approximately~~ up to 175 residential units above up to 35,000 sq. ft. of ground-floor retail uses. Retail uses would include up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of small, neighborhood-serving retail uses. The site is currently in the NC-2 zoning district, and would be changed to NC-T. Under the NC-T zoning, up to 258 ~~about 292~~ parking spaces could be provided~~,~~ 175 residential spaces and 83 ~~117~~ retail spaces. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

[12] At an assumed 90 percent efficiency for the proposed new retail uses, the 5,000 sq. ft. of other smaller neighborhood-serving retail spaces could have up to 4,500 sq. ft. of occupiable space, permitting up to three ~~nine~~parking spaces, and the 30,000-sq.-ft. food market could have up to 27,000 sq. ft. of occupiable space, would be permitting up to 64~~108~~ parking spaces.

The text in the DEIR (p. 157, first full paragraph) is revised as follows:

> The proposed Area Plan includes a proposal for demolition of the existing auto parts shop and development of the Kragen Auto Parts Site with ~~approximately~~ up to 175 residential units, up to ~~approximately~~ 35,000 sq. ft. of ground-floor retail uses, including up to a 30,000-sq.-ft. food market and up to 5,000 sq. ft. of other smaller neighborhood-serving retail space; and approximately 4,300 sq. ft. of open space. It is assumed that market-rate housing with an inclusionary affordable housing component would be developed on this property.

The text in the DEIR (p. 202) is revised as follows:

> The Kragen Auto Parts Site development would be a mixed-use project containing up to 175 residential units, up to a 30,000-sq.-ft.-food market, and up to 5,000 square feet of neighborhood-serving retail uses. Up to ~~Approximately~~ 258~~281~~ off-street parking spaces are proposed to serve the residential and retail uses on the site. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 204, last paragraph) is revised as follows:

> With implementation of the Area Plan, the Planning Code parking requirements would be revised to maximum parking allowances (i.e., a maximum of up to one parking space per residential unit could be allowed). For commercial uses, there would be no parking requirements; however, ~~new food markets~~ retail grocery stores larger than 20,000 gross sq. ft. would be allowed to provide one space per each 500 sq. ft. for the first 20,000 sq. ft., and, with conditional use authorization, one space per 250 square feet of occupiable space in excess of 20,000 sq. ft. The proposed changes to the Planning Code would allow a maximum of ~~292~~258 spaces to be provided as part of the Kragen Auto Parts Site development, including 175 residential spaces~~, 9 retail spaces,~~ and up to ~~108~~83 retail ~~food market~~ spaces. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible parking requirements per Planning Code Section 155.

The text in the DEIR (p. 205) is revised as follows:

> The Kragen Auto Parts Site development would have a peak weekday evening parking demand for 227 residential parking spaces and 170 food market/retail parking spaces. As currently proposed, the project sponsor would provide up to 258 ~~281~~ parking spaces: 175 for the residential units, ~~and 106~~ 83 spaces for the food market space and miscellaneous retail. The project sponsor would also provide five car share spaces (exceeding the Planning Code Section 166 requirement of three car share spaces) and would also be required to comply with handicapped accessible

parking requirements per Planning Code Section 155. ~~Of these spaces, 11 would be handicapped-accessible.~~

The text in the DEIR (p. 104, fourth bullet) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

- Under the Area Plan, the maximum building height at the Kragen Auto Parts Site would be 55 feet. ~~The building developed on the west site would be encouraged to step down from 55 feet to 45 feet on its northern side, in order to transition to the existing lower buildings to the northwest and west.~~ The building developed on the western half of the project site would step down as follows: Along Ocean Avenue, the massing on the western side would be reduced from five to four stories as it approaches the west. The fifth floor would be set back seven feet from Ocean Avenue. At the western property line, the fifth floor would be set back approximately 10 feet. The entire façade above the first floor on the western property line would be set back seven feet. The building massing steps down even more as it approaches the northwest corner facing the Westwood Park neighborhood. At this corner, the building terraces from five to four to three stories. Both east and west buildings would be ~~required to be~~ built to the property lines along Brighton, Lee and Ocean Avenues, as well as to the SFPUC easement on the property's western boundary.

The text on DEIR p.105 (first bullet) is revised as follows to clarify and correct the proposed height:

The Upper Yard parcel, jointly owned by Muni and BART, is proposed to be developed with about 200 residential units above 10,000 sq. ft. of ground-floor retail uses, parking, and new entrances to the existing BART station. Active retail space would be provided at the intersection of Geneva and San Jose Avenues and along the majority of the site's Geneva Avenue frontage. The height of the proposed development is expected to range between 40 and ~~80~~85 feet. The height limit of the northern half of the Upper Yard parcel would be reduced from 105 feet to 85 feet and the site of the Geneva Office Building and Powerhouse would be reduced from 105 feet to 40 feet.

The text in the DEIR (p. 29, second paragraph) is revised as follows (new language is double underlined):

The project proposes two off-street loading spaces and would meet the Planning Code requirements and the anticipated loading demand. These two loading spaces are for the sole use of the grocery store and other retail operators to be located on the Kragen Auto Parts Site.

The text in the DEIR (p. 207, second paragraph) is revised as follows:

The Kragen Auto Parts Site development's supply of two off-street loading spaces would meet the Planning Code requirements and the anticipated loading demand. These two loading spaces are for the sole use of the grocery store and other retail operators to be located on the Kragen Auto Parts Site.

The text of the DEIR, on p. 99, Table 1, Footnote 5, is revised as follows:

> Vehicular access to the residential uses would be from Brighton Avenue ~~and vehicular access to the food market would be from Lee Avenue~~. Vehicular ingress to the non-residential uses would be from Brighton Avenue and vehicular egress from the non-residential uses would be onto Lee Avenue.

The text in the DEIR (pp. 45 and 329, second bullet) is revised as follows:

> The project sponsor for the Kragen Auto Parts Site development would work with MTA and the Planning Department to ~~confirm that this signal change would be acceptable~~adjust the signalization at the Ocean/Brighton intersection to accommodate the Kragen Auto Parts Site development. The change in signalization shall meet City standards and specifications.

To clarify pedestrian conditions at the Ocean//Phelan/Geneva Avenue area, the text in the DEIR (p. 169, third through fifth sentences in the third paragraph) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> In this area, pedestrians are prohibited from crossing Ocean Avenue ~~intersections at certain locations, including the north-south crossing~~ at the Ocean Avenue/I-280 Northbound (NB) On-Ramp intersection, ~~north-south~~ crossing Geneva Avenue along the east side ~~ern edge~~ of the Geneva Avenue/I-280 Southbound (SB) Ramps intersection, and ~~the north-south~~ crossing Geneva Avenue along the west side ~~ern edge~~ of the Geneva Avenue/I-280 NB Ramps intersection. Also, the intersection of Ocean/Phelan/Geneva can be difficult to cross, due to free-flow right-turn pockets. Similarly, crossing ~~in front of~~ the I-280 SB Off-Ramp at Ocean Avenue can be difficult for pedestrians, as this is an uncontrolled movement for vehicles exiting the freeway and merging into Ocean Avenue westbound traffic~~which makes crossing in front of this intersection difficult~~.

The text in the DEIR (p. 170, first paragraph) is revised as follows (new language is double underlined):

> Bicycle routes in the Project Area are designated on Ocean Avenue (Route 90 west of Phelan Avenue, Route 84 east of Phelan Avenue), Geneva Avenue (Route 90), Phelan Avenue (Route 770), and Alemany Boulevard (Route 45). Wide-curb-lane bicycle routes are available on various streets in the vicinity of the project site such as Holloway Avenue (Route 90), and Alemany Boulevard (Route 45). The bicycle facilities on Alemany Boulevard have recently been upgraded to full Class II bicycle lanes (striped, on-street) between Rousseau Street and San Jose Avenue.

The subtotal row in Table 8 of the DEIR has been realigned below. No change has been made to the content of the table.

DEIR Table 8: Weekday Evening Parking Demand

Area of Development/Land Use	Project Parking Demand			
	Short-Term Commercial	Long-Term Commercial	Resident (Long-Term)	Total
Kragen, Phelan, Reservoir, Garage, and Firehouse:				
Residential	----	----	1,085	1,085
Retail	156	59	----	215
Supermarket	130	17	----	147
Subtotal	**286**	**76**	**1,085**	**1,447**
Ocean Avenue Infill:				
Residential	----	----	605	605
Retail	132	50	----	182
Subtotal	**132**	**50**	**605**	**787**
San Jose Avenue Infill:				
Residential	----	----	624	624
Retail/Other	106	40	----	146
Subtotal	**106**	**40**	**624**	**770**
Total	**524**	**166**	**2,314**	**3,004**

Source: SF Guidelines, Korve Engineering, 2006.

The text in the DEIR (p. 189, first paragraph) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> Implementation of the transit-only lane would necessitate the elimination of one northbound travel lane and the conversion of the northbound approach to the Ocean Avenue/San Jose Avenue intersection from a left-through lane and a through ~~though~~-right lane to a left-turn only lane and a through-right lane.

The text in the DEIR (p. 193, first paragraph) is revised as follows to acknowledge the correct title and to reflect the status of the bicycle plan in relation to the *Balboa Park Station Area Plan* (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

> These new bicycle lanes would enhance bicycle conditions by helping close the gaps in the current bicycle network and by providing key connections to CCSF and transit nodes in the Project Area. The *Balboa Park Station Area Plan EIR* fully evaluates the potential environmental impacts of these bicycle proposals in the context of the Area Plan itself but does not evaluate these bicycle proposals in the cumulative citywide context of the *San Francisco Bicycle ~~Master~~ Plan EIR*. The bicycle proposals in the Area Plan are not consistent with the bicycle proposals for these streets in the *Citywide Bicycle Master Plan*. For these reasons, unless the pending *San Francisco Bicycle ~~Master~~ Plan EIR* evaluates the bicycle proposals in the *Balboa Park Station Area Plan* in a citywide cumulative context, the bicycle proposals in the Area Plan could not be

implemented in accordance with a judicial determination that overturned prior environmental review of the *Bicycle Master Plan*. The *San Francisco Bicycle Plan EIR*, currently being prepared by MTA will consider a range of bicycle facility alternatives throughout the City, including those discussed in the *Balboa Park Station Area Plan EIR*.

The following text is added to the DEIR on p. 126, after the second paragraph:

Muni's Short Range Transit Plan

The *Short Range Transit Plan* is Muni's primary planning document, providing information on Muni's organization, major initiatives, service plans, capital improvement program, and operating financial plan. Chapter 5, Planning and Expansion, of MTA's *FY 2008-2027 Draft Short Range Transit Plan* notes that MTA's February 2002 *A Vision for Rapid Transit in San Francisco* identifies Geneva Avenue/Ocean Avenue as a major transit corridor and as a site for a possible future rail project.[13] MTA's 2002 *A Vision for Rapid Transit in San Francisco* notes that an interim step on Geneva Avenue would be to establish an exclusive right-of-way for the K-line on Ocean Avenue.[14]

The text in the DEIR (p. 9, last bullet) is revised as follows (new language is double underlined, while deleted language is shown in ~~strikethrough~~):

The Muni Metro M-line would continue to end at the Balboa Park BART Station (Station), until development occurs on the Upper Yard site. ~~It would terminate at a new stop on the Upper Yard site, upon future development of the Upper Yard parcel~~ If the MTA plan goes forward, the M-line would terminate at San Francisco State University rather than at the Balboa Park BART Station Upper Yard. The Muni J-line would be extended to meet the M-line at San Francisco State University.

The text in the DEIR (p. 87, first bullet) is revised as follows (new language is double underlined, while deleted language is shown in ~~strikethrough~~):

The Muni Metro M-line would continue to end at the Balboa Park BART Station until development occurs on the Upper Yard site. ~~It would terminate at a new stop on the Upper Yard site, upon future development of the Upper Yard~~ If the MTA plan goes forward, the M line would terminate at San Francisco State University rather than at the Balboa Park BART Station Upper Yard. The Muni J-line would be extended to meet the M-line at San Francisco State University.

[13] MTA, *FY 2008-2027 Draft Short Range Transit Plan*, http://www.sfmta.com/cms/rsrtp/srtpindx.htm#fy2008, accessed August 8, 2008.

[14] MTA, *A Vision for Rapid Transit in San Francisco (2002)*, http://www.sfmta.com/cms/rprinit/visindx.htm, accessed August 8, 2008.

The following text is added to the DEIR after the third paragraph on p. 128:

BART's Transit-Oriented Development Policy

In response to federal, state, and regional policy to concentrate growth around transit, BART has developed transit-oriented development goals to (a) increase transit ridership and enhance quality of life at and around BART stations by encouraging and supporting high quality transit-oriented development within walking distance of BART stations, (b) increase transit-oriented development projects on and off BART property through creative planning and development partnerships with local communities, (c) enhance the stability of BART's financial base through the value capture strategies of transit-oriented development, and (d) reduce the access mode share of the automobile by enhancing multi-modal access to and from BART stations in partnership with communities and access providers.[15]

The text in the DEIR (pp. 46 and 330, AQ-2) is revised as follows to clarify the mitigation measure (new language is double underlined, while deleted text is shown in ~~strikethrough~~).

AQ-2: The following measure is included in the Area Plan: ~~Future residential development within 500 feet of: (1) the I-280 freeway, and (2) the proposed bus layover facility on the Phelan Loop Site shall be developed with upgraded ventilation systems to minimize exposure of future residents to odors and pollutant emissions. If any active recreation areas such as playgrounds are proposed as part of any future residential development in either of these areas, they should be located at least 500 feet from the I-280 freeway if feasible.~~ New residential development proposed in the following areas shall include an analysis of PM2.5 and shall, if warranted based on the results, incorporate upgraded ventilation systems to minimize exposure of future residents to PM2.5 (which includes DPM) and other pollutant emissions, as well as odors: (1) within 500 feet of the I-280 freeway; (2) adjacent to the proposed bus layover facility on the Phelan Loop Site; (3) any active recreation areas such as playgrounds that are proposed as part of any future residential development in either of these areas; and (4) any other location where total daily traffic volumes from all roadways within 500 feet of such location exceed 100,000 vehicles.

The analysis shall employ either site-specific modeling of PM2.5 concentrations or other acceptable methodology to determine whether the annual average concentration of PM2.5 from the roadway sources within 500 feet would exceed the standard of 0.2 micrograms per cubic meter that has been shown to result in an increase of approximately 0.3 percent in non-injury mortality. If the incremental annual average concentration of PM2.5 concentration (from roadway sources only) were to exceed 0.2 micrograms per cubic meter at the project site, the project sponsor shall be required to install a filtered air supply system to maintain all residential units under positive pressure when windows are closed. The ventilation system, whether a central

[15] BART, Transit-Oriented Development Policy, http://www.bart.gov/docs/planning/BART%20TOD%20Policy.pdf, accessed August 8, 2008.

HVAC (heating, ventilation and possibly air conditioning) or a unit-by-unit filtration system, shall include high-efficiency filters meeting minimum efficiency reporting value (MERV) 13, per American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). Air intake systems for HVAC shall be placed based on exposure modeling to minimize roadway air pollution sources. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology to minimize outdoor to indoor transmission of air pollution.

In addition to installation of air filtration, the project sponsor shall present a plan that ensures ongoing maintenance of the ventilation and filtration systems. The project sponsor shall also ensure that the following information is disclosed to buyers and renters: (1) the findings of the particulate matter analysis, and (2) instructions concerning the proper use of any installed air filtration. If active recreation areas such as playgrounds are proposed as part of any future residential development, such areas shall be located at least 500 feet from freeways, if feasible.

The above standard shall also apply to other sensitive uses such as schools, daycare facilities, and medical facilities. (It is noted that such facilities are somewhat more likely to employ central air systems than are residential developments.)

The text in the DEIR (p. 51 first paragraph, and p. 335 third paragraph) is revised as follows to clarify Mitigation Measure AM-2. The revision clarifies that the mitigation measure only applies to certain areas within the Plan Area. It does not provide any new information, identify new impacts, or change the conclusions reached in the DEIR.

AM-2: AM-2 applies to any project involving any soils-disturbing activities greater than 10 feet in depth, including excavation, installation of foundations or utilities or soils remediation, and to any soils-disturbing project of any depth within the Phelan Loop and Kragen Auto Parts Sites, the east side of San Jose between Ocean and Geneva Avenues, and the Upper Yard Parcel ~~located within those properties within the Project Area for which no archeological assessment report has been prepared~~.

The text in the DEIR (p. 58 last paragraph, and p. 343 WQ-1) is revised as follows to clarify Improvement Measure WQ-1 (new language is double underlined, while deleted text is shown in ~~strikethrough~~).

WQ-1: Green stormwater management technologies could be incorporated into proposed new open spaces in the Project Area. Examples of green stormwater technologies include swales and other infiltration methods, rainwater gardens, stormwater planters, green roofs, pervious concrete, green streets, new open space, and reducing the use of pipes, curbs and gutters. Incorporation of these green stormwater management technologies could further delay peak stormwater runoff flows and provide reduction of pollutants in the stormwater runoff discharged to the combined sewer system.

The title of Chapter V in the DEIR (p. 325) is revised as follows (new language is double underlined, while deleted text is shown in ~~strikethrough~~):

V. MITIGATION AND IMPROVEMENT MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

Additionally the Table of Contents (p. i), and headers of pp. 326-343 are revised to reflect the updated chapter title.

The text in the DEIR (p p. 45 and 329) is revised as follows to clarify and be consistent with the traffic impact discussion (new language is double underlined, while deleted text is shown in ~~strikethrough~~). Revisions to the text does not change the conclusions reaches in the DEIR and all impacts identified remain the same.

> Level of Significance After Mitigation: This mitigation measure has been developed to reduce impacts related to the Kragen Auto Parts site to less-than significant levels by ensuring that the signal timing for the Ocean Avenue/Brighton Avenue intersection would be adjusted to provide a short protected left-turn green phase for westbound traffic. However, these measures are not included as part of the Area Plan adoption, as it is not certain whether the identified traffic measures are feasible and acceptable to the MTA. Therefore, this traffic impact would be considered a potentially significant impact. ~~Implementation of the above mitigation measure would reduce potential traffic impacts related to Kragen Auto Parts Site development to less-than-significant levels, by ensuring that the signal timing for the Ocean Avenue/Brighton Avenue intersection would be adjusted to provide a short protected left-turn green phase for westbound traffic.~~

Attachment 1: Comment Letters and Transcript of DEIR Hearing

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Balboa Park Station Area Plan Draft Environmental Impact Report Comments Log Case No.2004.1059E				
Comment Number	**Commenter Name**	**Agency/Organization**	**Date**	**Comment Type**
1	Dan Weaver		10/10/2007	Email
2	Greg Clinton	Westwood Park Association	10/25/2007	Letter
3	Commissioner Kathrin Moore	San Francisco Planning Commission Hearing Comments	10/25/2007	Oral comment at Commission hearing
4	Commissioner Michael J. Antonini	San Francisco Planning Commission	10/25/2007	Oral comment at Commission hearing
5–12	Bridget Maley, President	Landmarks Preservation Advisory Board	10/29/2007	Letter
14–30	Ilene Dick	Farella Braun and Martel LLP	11/2/2007	Letter + attachment
31–87	Rana Ahmadi James Lowe Sam Fielding	MTA	11/2/2007	Letter
81–87	Rita Evans	Sunnyside Neighborhood Association	11/4/2007	Letter
88	Ken and Lauren Ryckwalski		11/5/2007	Letter
89–91	James Blomquist, Vice Chancellor	City College of San Francisco	11/5/2007	Letter
92–145	Kevin Keck	Metropolitan Transportation Agency	11/5/2007	Letter +attachments
146–157	Tim Chan	BART	11/5/2007	Letter
158–162	Timothy Sable	Caltrans	11/5/2007	Letter

Dan Weaver
<djpweaver@yahoo.com>
10/10/2007 07:19 PM

To Jessica Range <Jessica.Range@sfgov.org>
cc
bcc
Subject Re: correction on DEIR Balboa Area Plan Geneva Office Building Square Footage

#1 This sq. footage is for the existing and proposed building. Is it possible for you to pass this onto Mr. Wycko?
Thanks, Dan

----- Original Message ----
From: Jessica Range <Jessica.Range@sfgov.org>
To: Dan Weaver <djpweaver@yahoo.com>
Sent: Wednesday, October 10, 2007 2:51:55 PM
Subject: Re: correction on DEIR Balboa Area Plan Geneva Office Building Square Footage

Hi Dan,

I am not sure whether the attachment below refers to the existing square footage or proposed. I would suggest making a formal comment on the DEIR in writing to:

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

Alternatively, you can wait for the plan to be heard before the planning commission and make a public comment at this time.

Sincerely,

Jessica Range
San Francisco Planning Department
Major Environmental Analysis (MEA)
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409
www.sfplanning.org

Dan Weaver
<djpweaver@yahoo.com>

10/09/2007 04:20 PM

To
jessica.range@sfgov.org

cc

Subject
correction on DEIR Balboa Area Plan Geneva Office Building Square Footage

This data is from Charlie Duncan of Carey & Co.

Check out the hottest 2008 models today at Yahoo! Autos. (See attached file: GOB Memo - Square Footage.doc)

Geneva Office Building and Powerhouse Gross Square Footage Calculations

#1 cont.

	Geneva Office Building	Powerhouse
Basement	2593 SF	
First Floor	5140 SF	3099SF
Second Floor	5021 SF	
Subtotal	**12754 SF**	**3099 SF**
Total	**15853 SF**	

Old Engine Co. N" 2 460 Bush Street, San Francisco, CA 94108
4' ' 773.0773 f. 415.771.1773

WESTWOOD PARK

October 25, 2007

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

Re: Balboa Park DEIR

Dear Mr. Wycko:

#2

On behalf of the 684 homes in Westwood Park, I want to express my disappointment that, aside from major traffic corridors such as Ocean and San Jose Avenues, the DEIR did not address traffic impact on surrounding neighborhoods. With additional housing being built on the Balboa Reservoir and along Ocean Avenue, business expansion along Ocean Avenue, and City College's expansion, Westwood Park will see a significant increase in traffic and parking *within* our neighborhood. This does not appear to be addressed in the DEIR.

Westwood Park already has significant cut-through traffic and parking congestion problems. We have been approved for an area-wide DPT traffic calming program, but there is no money to fund it. The Balboa Park plan will significantly add to these problems.

Our neighborhood is in favor of the project. We believe it can greatly improve the area. However, without the inclusion in the plan for traffic calming, including funding, we cannot support it.

Sincerely,

Greg Clinton

Greg Clinton
Board President
Westwood Park Association

CC: Ken Rich
Kate McGee

The Westwood Park Association, P.O. Box 27901 #770, San Francisco, California 94127
(415) 333-1125 www.westwoodpark.com email: board@westwoodpark.com

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CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA

--ooo--

SAN FRANCISCO PLANNING COMMISSION MEETING

Commission Chambers - Room 400

City Hall, 1 Dr. Carlton B. Goodlett Place

THURSDAY, OCTOBER 25, 2007 - 1:30 P.M.

SPECIAL MEETING - ITEM NO. 19

2004.1059E (R. COOPER: (415) 575-9027)

--ooo--

BALBOA PARK STATION AREA PLAN - Public Hearing on the Draft Environmental Impact Report (EIR).

The Planning Department-proposed Balboa Park Station Area Plan (the proposed project) includes amendments to the San Francisco General Plan and specific Planning Code changes related to zoning districts and height and bulk controls in the Project Area, which includes the area surrounding the Balboa Park Station and along Geneva, Ocean, and San Jose Avenues.

The proposed project would introduce a new zoning district- NCT (Neighborhood Commercial Transit) into the Project Area, that would potentially increase transit-oriented mixed-use developments.

Improvements to the existing streetscape, transportation system/transit facilities, open space, as well as new urban design policies may result from implementation of the Area Plan.

The Area Plan also includes specific proposals for mixed-use, transit-oriented development in the Project Area at: (1) the Phelan Loop Site; and (2) the Kragen Auto Parts Site.

Implementation of the Area Plan would result in a net increase of about 1,780 new residential units and

about 104,680 net new gross square feet of commercial development in the Project Area by the year 2025.

A net increase of about 90-200 jobs would be expected in the Project Area by the year 2025 as a result of implementation of the Area Plan.

--ooo--

--OOO--

A P P E A R A N C E S

PRESIDENT DWIGHT S. ALEXANDER

VICE-PRESIDENT CHRISTINA R. OLAGUE

COMMISSIONERS:

MICHAEL J. ANTONINI

M. SUE LEE

WILLIAM L. LEE

KATHRIN MOORE

HISASHI SUGAYA

COMMISSION SECRETARY: LINDA D. AVERY

--ooo--

P R O C E E D I N G S

THURSDAY, OCTOBER 25, 2007

COMMISSION SECRETARY: Commissioners, we are now on Item No. 19, Case No. 2004.1059E, Balboa Park Station Area Plan.

This is an public hearing on the Draft Environmental Impact Report and I do believe Commissioner Sugaya needs to --

COMMISSIONER SUGAYA: Oh, yeah.

I have to recuse because we worked on the historic recourse portion of the DEIR many many years ago.

COMMISSION SECRETARY: Is there a motion for recusal?

COMMISSIONER ALEXANDER: Move to recuse.

COMMISSIONER SUGAYA: Second.

COMMISSION SECRETARY: On the motion for recusal, Commissioner Moore?

COMMISSIONER MOORE: Aye.

COMMISSION SECRETARY: Commissioner Sugaya?

COMMISSIONER SUGAYA: Aye.

COMMISSION SECRETARY: Commissioner Bill Lee is absent.

Commissioner Antonini?

COMMISSIONER ANTONINI: Aye.

COMMISSION SECRETARY: Commissioner Alexander?

COMMISSIONER ALEXANDER: Aye.

COMMISSION SECRETARY: Commissioner Olague?

COMMISSIONER OLAGUE: Aye.

COMMISSION SECRETARY: Commissioner Sue Lee?

COMMISSIONER SUE LEE: Aye.

COMMISSION SECRETARY: Thank you. Commissioner Sugaya is excused.

MR. COOPER: Good afternoon, President Alexander and Commissioners. I'm Rick Cooper of the Department staff.

Before I begin my remarks, I would like to take this opportunity to introduce one of our new planners, an MEA, Jessie Range.

Jessica comes to us with a wealth of experiences she's held. We're delighted to have her working with us. I'm sure you will see quite a bit of her at upcoming hearings. Please join me in welcoming her to the Department.

We're before you today to conduct a public hearing on the Draft EIR for the Balboa Park Station Area Plan which

was described to you in greater detail at your October meeting, would amend the general plan and Planning Code related to design districts and height and bulk controls in the project area which includes the area surrounding Balboa Park Station and along Geneva, Ocean and San Jose Avenue.

The proposed plan would introduce a new zoning district in the project area. It will potentially increase transient oriented mixed use development and encourage improvements to existing street scape, transportation system, transit facilities, open space, and would provide new urban design policies.

The land also includes specific proposals for the transit for mixed use transit oriented development in the project area at what's called the "Phelan Loop site" and the "Kragen Auto Park Site".

We are interested in receiving your comments and those of the public on the analysis and conclusions of the Draft EIR.

A Court Reporter is here today to transcribe the hearing. So, I ask that all speakers speak slowly and clearly so the reporter can take an accurate transcript.

I ask that all written comments on the Draft are also being accepted at the Department's offices until the close of business on November 5, 2007.

Following public comment, we will prepare

written responses to all comments received and then we will be back before you to ask for your certification of the EIR which would include the Draft EIR and the comments and responses document.

Unless you have any questions about the process, we can open up the public hearing.

COMMISSIONER ALEXANDER: Okay.

We are now open for public comment. I have no speaker cards. Is there anyone desiring to comment on this item?

AUDIENCE: (No response).

COMMISSIONER ALEXANDER: Seeing none, public comment is closed.

The Department will be expecting written comments in the Planning Department Offices until the close of business on November 5th, 2007.

COMMISSION SECRETARY: Mr. President, are there any Commission comments on the Draft EIR?

COMMISSIONER ALEXANDER: There are and we'll take those, too.

Commissioner Moore?

COMMISSIONER MOORE: Since we had a presentation on the Balboa Park Station area which is the good plan I think with solid recommendations, I looked just in a cursory way at the EIR, particularly, at the program

#2

#3 cont.

level effect and on Page 20, either I'm not understanding it or there is a severe typo here.

I'm going to read the sentence in question.

"The project area is expected to gain 4,095 residents by the year 2025 if the proposed area plan as implemented. This would constitute a sixty-five percent gross in project held population compared to the cease based on population growth projection of sixty new residents". (Sic)

Is that supposed to read "'sixty' percent new residents"? Or "'sixty' new residents"?

That is my question. I think it would read sixty percent new residents.

COMMISSIONER ALEXANDER: Yeah. They can answer it.

COMMISSIONER ANTONINI: We will answer in the response and comments.

COMMISSIONER MOORE: This is my question, and then if I'm correct, this needs to be corrected to read properly.

Otherwise, nobody will understand because we are not growing by sixty people. That's my comment.

COMMISSIONER ALEXANDER: Thank you.

Commissioner Antonini?

COMMISSIONER ANTONINI: Thank you.

I think it's a well done document. Ocean Avenue has historically been always an area with a lot of transit and, in fact, a lot of transportation through it in all sorts of forms back a hundred and fifty years ago when it was basically the only way to reach the ocean from the southern part of San Francisco, and I think that's obviously going to continue.

And I think some of the changes that are proposed here are good solutions to address the traffic problems.

There will always be quite a few there and I think the key is to be able to figure out a way to calm it enough that you can still get the residents and those using BART and other services in and out of there while still making the area pedestrian friendly and that's going to be a challenge but I think it is has a ton of potential and, as I may have mentioned in the hearing on the last time we took this up, I think we should look at, you know, best practices in other areas throughout the Bay Area that have this sort a of configuration of BART and freeways and other local transit coming together in the same location and see which address the problems more successfully.

This may be one of the most challenging of all

#4 cont.

but thank you.

COMMISSIONER ALEXANDER: Thank you.

COMMISSION SECRETARY: Thank you.

That concludes the public hearing on the Draft EIR for the Balboa Park Station Area Plan.

Again, written comments will be accepted at the Planning Department Office until the close of business on November 5, 2007. Again, thank you.

(CONCLUDED AT 4:25 P.M.)

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REPORTER'S CERTIFICATE

I, EASTELLER BRUIHL, CSR No. 3077, a California Certified Shorthand Court Reporter for Star Reporting Service, Inc., 703 Market Street, Suites 1003-1013, San Francisco, California 94013, do hereby certify:

That the foregoing proceedings, Pages 1 through to 12, were taken before me at the time and place therein set forth; that all comments, objections and statements made at the time of the proceedings were recorded stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties nor financially interested in the action.

I declare under penalty of perjury by the laws of the State of California that the foregoing is true and correct.

Dated: Wednesday, November 14, 2007.

Easteller Bruihl, RPR, CSR No. 3077

LANDMARKS PRESERVATION ADVISORY BOARD

1650 Mission Street, Suite 400 | San Francisco, CA 94103-2479 TEL: 415.575.6916 | FAX: 415.558.6409

October 29, 2007

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

Dear Mr. Wycko.

On Wednesday, October 17, 2007, the Landmarks Preservation Advisory Board (Board) held public hearing and took public comment on the Balboa Park Station Area Plan Draft Environmental Impact Report (DEIR) dated September 21, 2007. After discussion the Board arrived at the following comments:

#5
- The Board requested that the document include a description of the proposed historic district and that the DEIR fully describe the boundaries of the proposed district and that the district include the historic neighborhood theater as a contributor.

#6
- The Board further commented that the Carey and Co. ratings listed on the survey matrix needed to be backed-up with information that describes why certain buildings were found to be not historic.

#7
- The Board Suggested that there should be mitigation measures that address the need for the following: additional survey work, Ocean Avenue design guidelines, and the landmark designation of the fifteen individual buildings as well as the Ocean Avenue potential historic district. Furthermore, the EIR should evaluate what the impact the new height district will have on the potential historic district and individual resources and should provide alternatives as well as mitigation measures if impacts are found.

#8

#9
- Furthermore, the Board requested that the potential impacts of the height change have not been fully analyzed in the DEIR and that no alternatives have been presented.

#10
- The Board feels that the proposed height change will have a significant adverse impact on the potential historic district. The Board believes the way to mitigate their concern is to lower the proposed height limit and to follow through with the historic resources survey. This should be followed up by the preparation of design guidelines that address the existing height limit. However, the Board feels that there may be an opportunity for adding height in certain locations.

#11 • The Board welcomes development that will meet the transit needs from outside of the district. The Board believes that it would be helpful if maps were included in the DEIR with the historic resources listed on the maps.

#12 • The Board believes that impacts analysis should take into consideration the economic and cultural impact of the loss of these buildings.

The Landmarks Preservation Advisory Board appreciates the opportunity to participate in the review of this environmental document.

Sincerely,

Bridget Maley, President
Landmarks Preservation Advisory Board

FARELLA BRAUN + MARTEL LLP
Attorneys At Law

Russ Building / 235 Montgomery Street
San Francisco / CA 94104

T 415.954.4400 / F 415.954.4480
www.fbm.com

ILENE DICK
idick@fbm.com
D 415.954.4958

November 2, 2007

Via Facsimile (415) 558-6409 and Mail

Mr. Bill Wycko
Acting Environmental Review Officer
Major Environmental Analysis Division
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA. 94103

Re: Balboa Park Station Area Plan Draft Environmental Impact Report
Case No. 2004.1059E
Comment Period: September 21 through November 5, 2007

Dear Mr. Wycko:

We represent Avalon Bay Communities, Inc., the project sponsor for the Kragen Auto Parts Site ("Kragen Site"). The Kragen Site is analyzed on a project-specific level in the Balboa Park Station Area Plan Draft Environmental Impact Report (DEIR). As you know, this is the City's first use of a Program EIR to incorporate project specific analyses. We are generally quite pleased with the City's effort. Since the DEIR will serve as the CEQA documentation for the Kragen Site project, we want to ensure that the DEIR adequately and accurately assesses the project's impacts and imposes reasonable and feasible mitigation measures. Our comments thus encompass clarification of the components of the Kragen Site and qualifications to the proposed mitigation and improvement measures. To simplify the task of responding to our comments, the page numbers of the text we are commenting on are provided at the beginning of each paragraph.

PROJECT DESCRIPTION-P. 71

Project Objectives-P.74

#13 P. 76 This project is consistent with the Area Plan not only because it will provide infill housing and commercial activity on an underutilized site in the Ocean Avenue commercial corridor, but its primary purpose is to build desperately needed rental housing and the required affordable housing units. Please amend the 1st bullet on p. 76 as follows: Insert "rental" before

#13 cont. "housing" and insert at the end, "as required by Planning Code Section 315, the City's Inclusionary Housing Ordinance."

Proposed Development Sites-P. 101

#14 PP. 13, 99, 136, 157, 202, 205 Throughout the DEIR, the proposed development of the Kragen Site is described as including: 175 residential units; 35,000 square feet of ground-floor retail uses, consisting of a 30,000 square-foot food market and 5,000 square feet of other smaller neighborhood-serving retail uses; approximately 4,300 square feet of open space (denoted as the Brighton Street Open Space throughout the DEIR); 281 off-street parking spaces and one-car share space. (See e.g., pp. 13, 99-Table 1 and n.5, and 103.) Since the DEIR is intended to be the CEQA documentation for the Kragen Site entitlements, we request that the project be described in terms of permitted maximums for each component. This change would ensure that the DEIR has identified all potential impacts that could occur at the Kragen Site under the proposed NC-T zoning. Thus, the project description should read "up to 175 residential units; up to 35,000 square-feet of ground-floor retail uses, consisting of a food market of up to 30,000 square feet and up to 5,000 square feet of other smaller neighborhood-serving retail uses; approximately 4,300 square feet of open space (denoted as the Brighton Street Open Space throughout the DEIR); and up to 292 off-street parking spaces and one-car share space." Text changes also need to be made to p. 100, item (iii) to revise the incremental change in development due to the Area Plan at the Kragen Site to "approximately 15 more residential units".

#15 P. 104 In the 4th bullet on p. 104, please delete the second sentence and replace it with the following text: "The building developed on the western half of the project site will step down as follows. Along Ocean Avenue, the massing on the western side will be reduced from five to four stories as it approaches the west. The fifth floor will be set back 7 feet from Ocean Avenue. At the western property line, the fifth floor will be set back approximately 10 feet. The entire façade above the first floor on the western property line will be set back 7 feet. The resulting design articulates a four-story massing along the western side of the building on the western half of the site that reduces the fifth floor's impact on the adjoining properties, thus minimizing the building's shadows on its western neighbors. ¶The building massing steps down even more as it approaches the northwest corner facing the Westwood Park neighborhood. At this corner, the building terraces from five to four to three stories. This results in a three-story building at the location where it is closest to the adjacent Westwood Park neighborhood. Such massing eliminates any shadows being cast on the adjacent Westwood Park cottages."

ENVIRONMENTAL SETTING AND IMPACTS

Transportation-P. 159

Loading Spaces-pp. 27, 29, 55, 177, 207

#16 The DEIR describes the loading spaces proposed on the Lee Avenue extension as being used by both the Kragen Site and the Phelan Loop Site. (See e.g., pp. 27 and 29). In fact, the 2 loading spaces proposed for the Kragen Site are intended for use only by the large food and other retail operators that will be located on the Kragen Site. To clarify that fact, on pages 29 and 207, please insert after the sentence "The project proposes . . . anticipated loading demand" the following text: "These 2 loading spaces are for the sole use of the large food and other retail operators to be located on the Kragen Site."

#17 PP. 99, 160, 200-201, 205-206, 207 Since the publication of the Area Plan, Avalon Bay has identified a preferred site configuration for vehicular access to the proposed development's retail spaces. Rather than use the Brighton Avenue extension for retail vehicular egress[1], which is proposed as part of the Area Plan, Avalon Bay proposes that Brighton Avenue be used for retail vehicular ingress and that Lee Avenue be used for retail vehicular egress. Exhibit A shows how the proposed revision would work. See Figure 8 of the "Balboa Park Area Plan Transportation Study: Final Report", December 19, 2006. This modification to circulation would relieve Brighton of retail vehicular egress traffic and eliminate queuing along Brighton, enhancing pedestrian access to the Brighton Open Space and creating a more pedestrian-oriented environment. We request that this reconfiguration of site access and its traffic impacts be analyzed so that it can be included in the Final EIR. The text and impact analysis should be included in FEIR sections on project description, setting, impact and mitigation and improvement measures, as applicable.

MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT-P. 325

Development Projects-P. 329

#18 PP. 45, 329 The DEIR proposes a specific mitigation measure for the Kragen Site's traffic impacts. The measure will adjust the signal timing for the existing Ocean Avenue/Brighton Avenue intersection (on the south side of Ocean) to provide a short protected left-turn green phase for westbound traffic. The text should be revised to include a description of why this mitigation measure is being proposed: "According to the Final Transportation Study,

[1] See p. 205 for a description of the proposed garage access in the DEIR.

#18 cont.

this measure 'would allow any left-turn queues [on Brighton] to clear the intersection.' Transportation Study, p. 79." This makes clear that there is not a new signal being required at the Brighton Avenue extension on the north side of Ocean Avenue, but merely an adjustment to the signalization timing at the existing signal on the south side of Ocean at the Ocean/Brighton Avenues intersection.

#19

PP. 45, 329 This mitigation measure requires Avalon Bay to work with MTA and the Planning Department to confirm "that this signal change is acceptable". See p. 329, 1st bullet. In this context, "acceptable" can reasonably be interpreted to mean "satisfactory and able to be agreed to or approved of"[2]. If MTA has discretion whether or not to "accept" this measure, then it is not feasible under CEQA. A mitigation measure is feasible "when it can be accomplished . . . within a reasonable period of time . . ." CEQA Guidelines § 15364. Formulation of a mitigation measure cannot be deferred. CEQA Guidelines § 15126.4(a)(1)(B).

PP. 45, 329 These CEQA Guidelines require that this mitigation measure be implemented without the qualification of waiting to see if it is "acceptable to MTA or the Planning Department". Please revise this mitigation measure to read: "signalization shall meet applicable City standards and specifications." Otherwise, there is a possibility that the City may find that this measure may not be feasible for the intended purpose and there would need to be a later-developed mitigation measure. Since CEQA does not allow deferral of formulation of mitigation measures, the text should be revised as suggested.

#20

PP. 45, 329 In addition, the mitigation measure makes Avalon Bay financially responsible for all costs associated with the timing adjustment to the existing signalization. However, as the DEIR notes, there are other projects that will be developed during the applicable timeframe for this mitigation measure. See e.g., p. 99-Table 1, Tier 2 projects and p. 106. These projects will benefit from the adjustment to signalization timing paid for by Avalon Bay in 2008 by reducing their traffic impacts to less-than-significant levels. For this reason, at the end of the 2nd bullet of this mitigation measure at pp. 45 and 329 add: "Future projects contained in Tier 2 of Table 1, which rely on this DEIR or an Addendum to it for their CEQA approval, shall reimburse Avalon Bay or its successor for their proportionate share of costs incurred in maintaining the signalization timing to avoid left-turn queuing on Brighton Avenue based on the amount of vehicle trips from the project or some other indicia mutually agreed upon by the City, the project sponsor and Avalon Bay or its successor."

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[2] Cambridge Advanced Learner's Dictionary at http://dictionary.cambridge.org/define.asp?key=99318&dict=CALD

Area Plan-p. 326

#21 PP. 330-331 We are concerned that some of the mitigation and improvement measures proposed for the Area Plan that would also be applicable to the Kragen Site lack specificity, making compliance with them difficult to achieve.

#22 P. 330 Mitigation Measure AQ-2 requires "upgraded ventilation systems to minimize exposure of future residents to odors and pollutant emissions." There is, however, no explanation of what would be a satisfactory "upgraded ventilation system". Would Title 24 compliance be sufficient? Are there studies required of Avalon Bay to determine the extent of "upgrade" required for ventilation systems? Please provide examples or references to what features, means or methods would comply with the required "upgrades."

#23 P. 331 Mitigation Measure N-1 requires that "needed noise reduction requirements be incorporated into new residential developments" when the CNEL exceeds 60 dBA. The DEIR concludes that the Kragen Site development would exceed this standard. See p. 220. If these undefined "noise reduction requirements" would be in addition to Title 24 compliance, what guidance or performance standard is there to determine what those measures would be? Please provide examples or references to what would features, means or methods would comply with the "noise reduction requirements."

#24 P. 331 Mitigation Measure N-2 requires that a vibration analysis be conducted for the Kragen Site. See Table 18, p. 224. What guidance or performance standards can be used to identify acceptable "measures . . . to reduce the potential for vibration disturbance"? Please provide examples or references to what would features, means or methods would be satisfactory ways to "reduce the potential for vibration disturbance."

Improvement Measures Identified in the DEIR-P. 338

#25 *Improvement Measures applicable to the Area Plan that are applicable to the Kragen Site*-P.338-340

P. 338 The Parking Improvement Measures do not expressly exempt the Kragen Site. The 2nd bullet under *Parking* on p. 338 states that "[e]fforts could be made to enhance . . . circulation, which would reduce the reliance upon private vehicles." We would request that this text be revised to be made inapplicable to the Kragen Site based on the following. The project site is being rezoned to NC-T. This zoning encourages the retail uses proposed for the Kragen Site. NC-T zoning permits up to 117 parking spaces for these retail uses, including up to 108 parking spaces for the 30,000 square-foot grocery store. Because this store will serve the neighborhoods surrounding Ocean Avenue (e.g., Glen Park and the Outer Mission), many patrons will need their own cars to get to the store and bring home their groceries. Requiring

#25 cont

Avalon Bay to adopt measures to reduce reliance on private cars would effectively eliminate the retail activity at the grocery store, contrary to the Project Objectives for the Area Plan and for the Kragen Site. See pp. 74-75. In addition, if the on-site parking were reduced, the resulting residential and retail parking overflow would increase the competition for the limited on-street parking with the new Library patrons and shoppers to other Ocean Avenue commercial uses. This outcome will also conflict with the Project Objectives that seek to "strengthen the economic base of the community by increasing neighborhood-serving retail and service businesses" and "increas[e] the community's supply of housing . . .". p. 74.

#26

P. 342 Improvement Measure SM-1 is specifically applicable to the Kragen Site. It consists of subjective design guidelines for minimizing shadow impacts on publicly accessible open spaces not otherwise subject to Planning Code Section 295. See p. 342. Currently, none of the open spaces near the Kragen Site are subject to Section 295 because they are not owned by the Recreation and Park Department. This Improvement Measure should be deleted.

#27

P. 343 Improvement Measure WQ-1 requires "green stormwater technologies". What constitutes "green stormwater technologies"? Please state what green stormwater technologies could be included within this Improvement Measure.

P. 339-341 Improvement Measures Applicable to the Kragen Site

#28

PP. 338-339 The Bicycle Improvement Measures propose conditions that exceed the Planning Code. The text at p. 338 clearly says that although the Planning Code does not require the Kragen Site project to provide bicycle amenities for commercial uses, it should nonetheless: 1. Provide the Planning Code required shower and locker facilities (four showers and eight lockers); and, 2. Provide additional bicycle parking spaces for employees. Top of p.339, 1st and 2nd bullets. This text should be removed since the Planning Code does not require bicycle amenities for the food market/retail uses. Through Avalon Bay's pre-leasing discussions, they have been told by potential large food and retail operators for the site that it is highly unlikely their employees would use these facilities, even if available. Additionally, because of the limited site area devoted to the grocery store, storage, delivery and sales space is a more necessary use than accommodating lockers and showers which will not be used.

#29

P. 341 We have discussed above that the 2 loading spaces for the Kragen Site would be located along Lee Avenue and used only by the large food and other retail operators on the Kragen Site. See e.g., pp. 29, 55, 177, 207.

#30

p. 340 To be sure that the trucks that are intended to be making deliveries and pickups at the Kragen Site's food and retail uses are not precluded from using these loading spaces, the first bullet at p. 340 should be deleted and replaced with the following text: "Fifty-foot trucks are permitted as long as the other measures below are met." We are recommending this change

#30 cont.

because large retail food operators uniformly require trucks of 50 feet in length. The 2nd bullet at p. 340 should be revised to read: "All Kragen Site retail operators which use these loading spaces will use their best good faith efforts to restrict deliveries from trucks exceeding 50 feet in length to the period after 7 PM." We are recommending this change because of the Kragen Site's predominant residential use; requiring deliveries before 7AM is not feasible since such activity would disturb the residents' peace and quiet. This improvement measure should thus be limited so that the large food and retail operators need only use their best good faith efforts to have deliveries occur after 7 PM.

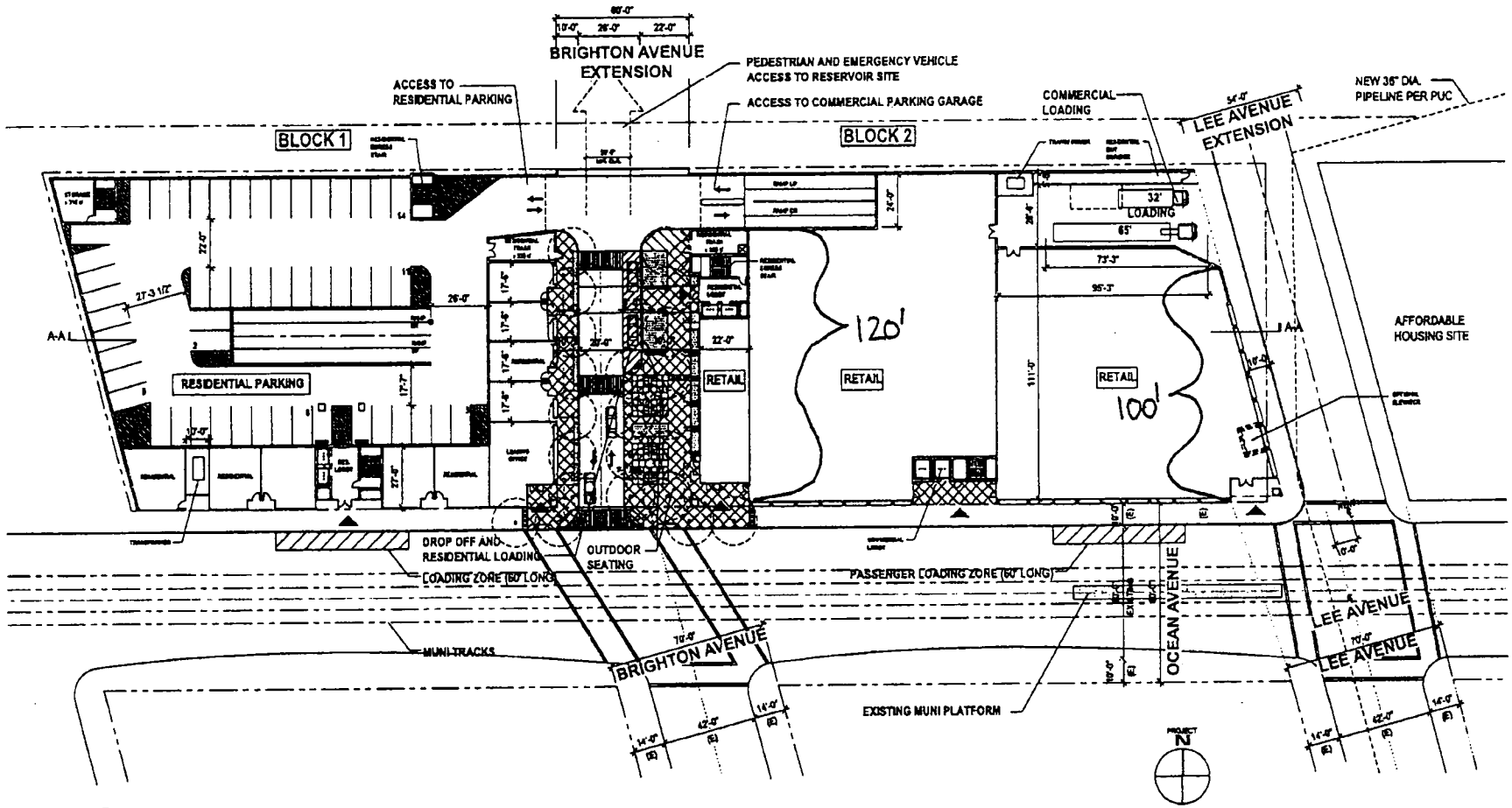
Thank you for allowing us to submit these written comments to you for consideration. Please do not hesitate to contact me at (415) 954-4958.

Sincerely,

Ilene Dick

cc: Meg Spriggs
Eric Sporre
Rick Crawford, Planning Department

EXHIBIT A



Source: Pyatok Architects, Inc.

Korve Engineering

BALBOA PARK STATION AREA PLAN

Figure 7

KRAGEN SITE PLAN

MTA | Municipal Transportation Agency

MEMORANDUM

TO: Bill Wycko, Acting Environmental Review Officer

FROM: Rana Ahmadi
James Lowé
Sam Fielding

THROUGH Jerry Robbins

SUBJECT: Comments on Balboa Park Station Area Plan DEIR

DATE: November 2, 2007

We have reviewed the report entitled: "Balboa Park Station Area Plan DEIR" Case Number 2004.1059E, dated September 21, 2007, and have the following comments:

Parking & Traffic Comments

#31 Figures 1 and 2: These figures are not legible due to their small scale and fuzziness. Each one of these figures can be made more legible by splitting them to two facing pages and improving the contrast in the print.

Figure 6: This figure is to represent the existing condition on how MUNI buses access the bus yard at the end of the bus lines 49 and 9. The figure is faded and not legible.

Figure 10: This figure is not legible.

#32 Page 159, Street Network Changes: The street network improvements proposed in this section are analyzed as part of the EIR. There are no detailed descriptions of these proposals or drawings indication the difference between existing and proposed conditions and therefore they are difficult to follow for the reader. It would be helpful if there is a drawing included for each proposal, to the extent available, in the text or Appendix of the EIR. More detailed description in other parts of the EIR should be cross-referenced. The actual changes need to be noted in more detail.

#33 Pedestrian Impact: BART 2005 ridership at the Balboa Park station indicates about 40,000 entry and exits on a daily basis. This number is supposed to grow with or without the project due to other development in the area such as the City College. The proposed project is expected to add about 3,800 pm peak trips to the area including vehicular, transit, and other trips. The developments in the area would have the option of providing no parking which could shift a large number of vehicular trips to transit trips. Considering the potential added number of trips to BART, it is not clear if the pedestrian impact at BART exits could be considered not significant, particularly on Geneva Avenue where the bus stops and BART

#33 cont entries are at close proximity. If the pedestrian improvements proposed as part of the plan are to address this particular issue, they need to be discussed in more detail under the 2025 pedestrian impacts.

#34 Page 159, 5th bullet: Did the traffic analysis for Phelan Avenue between Ocean and Judson Avenues consider the traffic impacts of the removal of the two center travel lanes? We are concerned that the traffic analysis considered Phelan/Ocean/Geneva as two separate intersections when this should have been considered one intersection for traffic analysis purposes.

#35 Note- MTA has a somewhat different proposal for redesigning Phelan Avenue. The MTA Phelan Avenue redesign would remove one southbound lane on Phelan Avenue between Judson Avenue and a point approximately 100 feet north of Ocean Avenue. The MTA proposal also includes a new signal at the intersection of Phelan Avenue with South Cloud Circle and a new bus exit from the Phelan Loop bus terminal, a new traffic signal at North Cloud Circle/Lee Avenue and reconfiguration of the existing signal at the Phelan parking lot entrance (signal to be converted to pedestrian signal crossing only for new CCSF campus development in reservoir with a new parking lot entrance farther to the north).

#36 Page 159, 6th bullet: Please provide more detail and a scaled diagram of the proposed reconfiguration of the intersection of Ocean/Phelan/Geneva. Any proposed reconfiguration should consider impacts to turning movements by Muni buses and delivery trucks and vehicle queuing in the right lane from westbound Ocean Avenue to northbound Phelan Avenue.

#37 Page 165, Figure 11. Please check current Muni System Map for updated routes.

#38 Page 166, 3rd paragraph: Please note that the 29-Sunset connects the Project Area with the Sunset and Richmond Districts and is a key west-east cross-town route, with high ridership of students to SF State University and City College of San Francisco.

#39 Page 169, 2nd paragraph: Use a more precise measure than "high" and "relatively low" to describe pedestrian volumes. In parentheses after high and relatively low, provide pedestrian counts (at key intersections provide pedestrian crossings per peak hours, 7-9 AM, 11-1 PM, 4-6 PM) and relative comparison to downtown and other city neighborhoods. Describe key pedestrian/student walking routes between Muni stops on Ocean, Geneva and Phelan Avenues and City College campus.

#40 Page 169, 3rd paragraph: Please describe locations within the project area where there are sidewalk gaps and a need for or plans for ADA curb ramp upgrades by DPW. The report should mention the pedestrian bridge over I-280 connecting Balboa Park with Havelock Street, an important access route for students walking to the east side of

#40 cont. campus. Please note that there is no sidewalk on the south side of Havelock Street between the pedestrian bridge and West Road. This forces students who walk to campus on the south side of the pedestrian bridge to cross Havelock Street at a blind curve just west of Circular Avenue and Havelock Street in order to use the sidewalk on the north side of Havelock Street. Also, there is no sidewalk on the north side of Havelock Street between Edna Street and West Road, forcing pedestrians to walk in the street.

#41 Page 169, 3rd paragraph: We suggest less confusing language describing pedestrian crossing prohibitions: "including crossing Ocean Avenue at the Ocean Avenue/I-280 Northbound (NB) on-ramp intersection, crossing Geneva Avenue, at the Geneva Avenue/I-280 SB Ramps intersection on the east side of the intersection and crossing Geneva Avenue at the Geneva Avenue/I-280 NB Ramps intersection on the west side of the intersection."

Also consider changing the second-to-the-last sentence to read: "Similarly, it is difficult for pedestrians to cross in front of the I-280 SB Off-Ramp at Ocean Avenue as this is an uncontrolled movement for vehicles exiting the freeway and merging into Ocean Avenue westbound traffic."

Page 165, Figure 11: Please add Bright and Ramsell Streets, which are missing in the map.

#42 Page 170, 1st paragraph: There should be a description of the type of existing bicycle facilities for each bicycle route listed (i.e. – do bicycle lanes exist, or wide curb lanes, or just standard shared lanes?) The text describes Alemany Boulevard as being a "wide-curb-lane" bicycle route – this in particular should be updated since Alemany Boulevard now has bicycle lanes between Rousseau Street in the north and San Jose Avenue in the south.

#43 Page 175, Table 8: Please correct misalignment of subtotal numbers in columns.

#44 Page 180, 2nd bullet: Please note that this bike lane proposal differs from the MTA bike lane proposal for Phelan Avenue.

#45 Page 180, 1st and 2nd bullets: The 1st bullet states that bicycle lanes would be added to Ocean Avenue and Phelan Avenue. The 2nd bullet describes that travel lanes would be removed on Phelan to add bike lanes, but there is no discussion about what would change on Ocean Avenue to allow bicycle lanes to be added – is parking removal proposed, or is a travel lane proposal proposed? Existing and proposed cross sections of Ocean Avenue should be provided. If travel lanes need to be removed on Ocean Avenue to add bicycle lanes (which we believe they do), is this captured in the LOS calculations for the "2025 with Area Plan" condition, or in the section describing impacts to transit?

#46 Page 180, 3rd bullet: Provide a diagram of this intersection reconfiguration and clarify who would pay for it.

#47 Page 181, 1st paragraph: As stated earlier, please note that the proposed reconfiguration of the Ocean/Geneva/Phelan Avenue intersection, including channelizing turning movements, narrowing corner geometry or removing free flow right turn pockets and adding corner bulb-outs, must carefully consider impacts to queuing by drivers turning right onto Phelan Avenue from Ocean Avenue and the turning movement requirements of large truck deliveries (grocery and campus deliveries) and Muni buses. Please cite who would pay for proposed reconfiguration.

#48 Page 183, 1st paragraph: Please add that the Lee Avenue Connection to CCSF Variant (Ocean Avenue to Phelan Avenue) would include Class II bicycle lanes in both directions along the length of Lee Avenue, which is proposed to be 34 feet wide, curb-to-curb. At a meeting on May 25, 2007 CCSF, their consultants (Fehr & Peers, RHAA and BKF) and MTA agreed that the 34 foot wide north-south section of Lee Avenue would include 5 foot bicycle lanes and 12 foot vehicle lanes for both directions. (5'-12'-12'-5')

#49 The east-west section of Lee Avenue alongside Riordan High School is proposed to be 44 feet wide, curb-to-curb, to accommodate Class II bicycle lanes and center turn lane.

#50 Page 186, 1st paragraph: Please provide analysis or clarify why the 29-Sunset and 43 Masonic bus routes are not included in the Transit Impacts analysis. The 29-Sunset is used by students commuting to City College from the Sunset District and south east neighborhoods and the 43-Masonic connects northern city neighborhoods of San Francisco to City College.

Comments on Balboa Park Station Area Plan DEIR

#51 Page 186, 3rd paragraph: The discussion should include impacts to transit associated with removing travel lanes on Ocean Avenue to add bicycle lanes, per comment above.

#52 Page 189,1st paragraph: correct misspelling: "though-right lane."

#53 Page 192, 1st paragraph: The proposed elimination of the channelized right-turn pockets for southbound and westbound traffic and adding corner sidewalk bulbs at this intersection would need to be designed, analyzed, reviewed and implemented by MTA. Preliminary analysis of these proposals indicates that the addition of corner bulb-outs at the northeast and northwest corners of Ocean and Phelan Avenues are not feasible due to truck delivery and Muni bus turning requirements. The elimination of channelized right-turn pockets may not be feasible due to the resulting queuing, (especially during peak student commute times) that would occur as through movement vehicles become backed up behind right turning vehicles on Ocean and Phelan Avenues.

#54 Page 192, 1st bullet: There needs to be a description of what would change on Ocean Avenue (i.e. – travel lane removal in both directions) in order to add bicycle lanes, similar to the description in the 2nd bullet for Phelan Avenue.

#55 Page 192 , 2nd bullet: This bullet should be corrected or clarified. The MTA Phelan Avenue plan would reconfigure Phelan Avenue between Judson and Ocean Avenues to eliminate only one center travel lane in the southbound direction, maintain two travel lanes in the northbound direction, left turn pockets for South Cloud Circle and Lee Avenue and establish Class II bicycle lanes in both directions.

#56 Page 193, 1st paragraph: All instances of "Bicycle Master Plan" should be replaced with "San Francisco Bicycle Plan."

#57 Page 193, 1st paragraph: There is a sentence that reads "The bicycle proposals in the Area Plan are not consistent with the bicycle proposals for these streets in the citywide Bicycle Master Plan." The EIR should note that the bicycle proposals in the Area Plan are consistent with the San Francisco Bicycle Plan.

#58 Page 193, 2nd paragraph: How many lanes of traffic would be provided on the Phelan Avenue approach to the Geneva/Ocean/Phelan intersection under this proposal?

#59 Page 193, 3rd paragraph: This paragraph describes a westbound travel lane removal on Ocean Avenue to add bicycle lanes – this is inconsistent with descriptions provided elsewhere in the document, which don't discuss travel lane reductions on Ocean Avenue. Was a travel lane reduction on Ocean Avenue modeled in the intersection analysis or considered for impacts to transit? Also, the proposal to remove a travel lane in the westbound direction but NOT in the eastbound direction is inconsistent with what MTA thinks would need to change on Ocean Avenue in order to add bicycle lanes (i.e. – travel lane removal in both directions).

#60 Pages 195-207, Phelan Loop Development Sites and Kragen Auto Parts Sites: These two sites are getting, to some degree, project level clearance. The project descriptions for these two projects need to be accompanied by graphics. There is no proposed condition graphics for the Phelan Loop operations for bus access and exit. There is a detailed description for garage access to the Kragen Auto Parts Sites, presumably based on some plans. It would be helpful to the reader/reviewer if these plans are presented as part of the EIR or in the Appendix.

#61 Page 196, Traffic Impacts: It is not clear whether the traffic analysis for the Phelan Loop Development Site includes the proposed traffic improvements. The proposed Ocean Avenue bicycle lane, which is a short term project and expected to be completed in five years, would eliminate one traffic lane in each direction as an option. Does the analysis take this into consideration for traffic impact analysis? I think Sam made this comment also.

#62 Page 197, Phelan Loop Operations. There is potential conflict for fire truck exits when buses are entering the new Phelan Loop access from Ocean Avenue. The DEIR needs to address this potential conflict and suggest measures to improve any such conflict.

#63 Page 197, 3rd paragraph: Please include analysis or clarify why Muni lines 29-Sunset and 43-Masonic are not included. 29-Sunset is major west-east commute route for students traveling from Sunset District and eastern neighborhoods to City College and 43-Masonic connects northern neighborhoods to City College.

#64 Page 199, Parking Impacts: EIRs should analyze and report the worst case scenarios in terms of impacts. The parking discussion assumes that the Phelan Loop Development Site would provide a certain number of parking spaces. If there is no certainty based on some agreement or documentation, for the impact reporting purposes in this EIR, the parking analysis should include a range of parking deficits assuming no parking to maximum parking provided, similar to the methodology used to calculate and report the 2025-plus-project condition for parking.

#65 Page 201, Loading Impacts: Similar to the parking condition, the EIR should assume a range for the project's number of loading spaces and report the deficit accordingly.

#66 Page 201, 3rd paragraph: Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks double parking on Ocean Avenue.

#67 Page 202, Traffic Impact: Similar to the Phelan Loop Development Site noted above, the discussion needs to state clearly if the traffic improvements were considered in the analysis. Ocean Avenue bicycle lanes that could eliminate a traffic lane should be considered as an alternative.

#68 Phelan Loop Site and Kragen Auto Parts Site: These sites are adjacent to each other and the development on these two sites is expected to take place within the next five years. For the existing-plus-project scenario, the EIR does not analyze and report the traffic impacts of the two projects combined. Therefore, the EIR could be underestimating the potential significant combined impacts of these two proposals for the existing-plus- project condition.

#69 Page 207, 2nd paragraph: Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks extending out into Lee Avenue or double parking on Lee or Ocean Avenues.

#70 Page 325: The title of this chapter should also include "improvement measures." For CEQA purposes, mitigation measures and improvement measures address very different issues.

#71 Page 329, Mitigation Measure and Page 202 Traffic Impact: The traffic impact discussion on page 202 acknowledges that the impact at the intersection of Ocean Avenue and Brighton Street is significant since MTA has not reviewed the proposed signal timing changes. Page 329 assumes the impact on that same intersection as being mitigable. We recommend that since the proposed changes to signal timing at this intersection have not been reviewed by MTA, the EIR finds the impact as potentially significant under mitigation measures and for consistency.

#72 Page 340, *Loading.* Note that virtually all grocery stores use 60' trucks for deliveries. Adequate loading areas will be needed to avoid having large trucks extending out into Lee Avenue or double parking on Lee or Ocean Avenues which will disrupt traffic flow. Rather than listing the bullet point improvement measures to deal with an inadequate 30 foot loading dock, the food market operator should be required to construct loading docks for 60 foot truck deliveries.

Service Planning Comments

#73 Page 197, 4th paragraph: **Reconfigure the Phelan Loop Terminal** – the proposed terminal design that has buses entering from Ocean Avenue, looping around the firehouse and exiting onto Phelan has serious space constraints and operational concerns. MTA staff is recommending that the project acquire more space on the west and north sides of the proposed terminal to increase storage capacity and flexibility. Staff is also recommending that the Phelan/Ocean/Geneva intersection be given special treatment to allow Muni buses to exit the terminal without serious delay. This will require that a system that allows buses priority be installed at the terminal exit.

#73 cont. As an alternative, a more natural counter-clockwise loop entering on Ocean and exiting onto a less congested Lee Avenue similar to the existing terminal should be explored. Project planners should look into the feasibility of building over the existing terminal. This would allow new housing to be constructed above the terminal and both functions to co-exist in the same land space. The area surrounding the firehouse and along the waterline easement should be developed into a park-like path offering students off-street access to the Muni terminal and the Ocean Avenue commercial district.

#74 Page 160, 1st paragraph: **Balboa Reservoir** – This reservoir has never stored water, only cars, currently its true function is as a large parking area. This is a waste of prime land; and the City should consider constructing a 2 or 3 story parking structure to free up the land for other uses.

#75 Page 159, 5th bullet: **Reconfigure Phelan Avenue** – While the redesign of this street will be beneficial to City College and improve pedestrian safety, staff believes that the concurrent increase in congestion on Phelan will significantly delay Muni. The Phelan/Ocean/Geneva intersection cannot efficiently accommodate southbound Phelan traffic and Muni buses exiting north of the firehouse into the intersection. As noted above, a signal priority system is needed for the buses exiting the terminal.

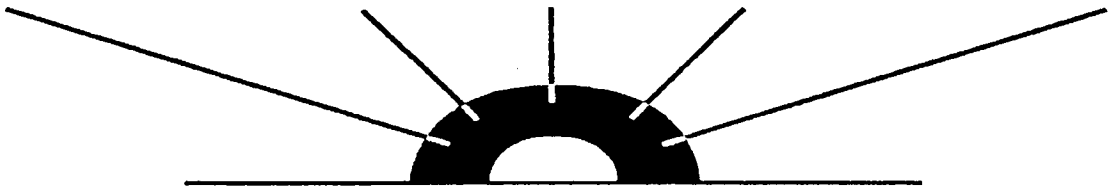
#76 We are also recommending the establishment of curbside transit lanes on Phelan in both the northbound and southbound directions. This will enable the 36-Tereisita and 43-Masonic buses easy passage through the congestion that forms during the school year.

#77 Page 160, 8th bullet: **Decking over I-280** – This is a very grandiose and ambitious plan that may be extremely difficult to fund and see to fruition. Project planners should develop a less ambitious alternative or interim plan using existing spaces. A phased approach may be a more realistic one.

#78 Page 159, 1st and 3rd bullets: **Pedestrian Access/Circulation** – Geneva/San Jose/Balboa Park Station - Currently, pedestrian access around the station or getting across Geneva or San Jose is a difficult prospect due to grade changes and heavy traffic. For example, disabled passengers have a difficult time navigating the transfer from the current M-line terminal and the BART station due to the grade and myriad of uneven pavement surfaces and Muni tracks they must navigate.

#79 Page 187, 2nd and 3rd paragraph: The M-line terminal has been the scene of at least one pedestrian fatality since alighting M-line passengers do not heed traffic signals and jaywalk directly across the street. The plan is proposing improvement to the M-line terminal.

#80 Page 188, 2nd paragraph: At the Balboa Park Station, the J-line passenger stop is not safe and does not allow a safe, natural walking route to San Jose Avenue. Currently, pedestrians walk along the right-of way or through a narrow choke point to reach San Jose Avenue. This is primarily due to the constrained area and significant grade changes between the passenger stop and Geneva Avenue.



November 4, 2007

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

Dear Mr. Malzer,

Subject: Comments on 2004.1059E, *Draft Environmental Impact Report, Balboa Park Station Area Plan*, DEIR Publication date September 21, 2007

The proposed developments outlined in the Balboa Station Area Plan will result in significant, long-term changes to the Sunnyside neighborhood. These comments on the *Draft Environmental Impact Report, Balboa Park Station Area Plan*, are made on behalf of the Sunnyside Neighborhood Association.

Sunnyside is located to the north and east of the project area and is bounded by Phelan Avenue, Ocean Avenue, Interstate 280, Circular Avenue, Baden Street, Mangels Avenue, Ridgewood Avenue, and Flood Avenue. Located just north of City College, Sunnyside already bears the brunt of parking and traffic pressure from thousands of commuter students and staff driving through our neighborhood and looking for parking each weekday from 7 a.m. until 10 p.m.

The Sunnyside Neighborhood Association (SNA) has represented the 2,000 households in Sunnyside in matters of neighborhood concern since the association's founding in 1974.

SNA notes that there are many deficiencies in the *Draft Environmental Impact Report (DEIR)* in its current form. In particular, we want to call attention to the following major problems, each of which is addressed in more detail below.

- Mitigation measures to respond the to substantial degradation in traffic levels of service and impact on transit service is either non-existent or completely inadequate, as is noted in the *DEIR* itself.

- The Planning Department has made little or no effort to coordinate its plans with City College of San Francisco, seriously compromising public safety on Phelan Avenue, a matter not addressed in the *DEIR*.

- Bicycle lanes on Phelan and Ocean Avenues will degrade both vehicular flow and transit operation, as noted in the *DEIR*, yet their implementation is not challenged and their impact is not mitigated.

- A parking shortfall of almost 1,000 parking spaces in the Plan Area will result in residents, students and visitors vying for parking that doesn't exist since no mitigation is identified.

- The proposed development is at a scale inconsistent with the neighborhood's current character. An additional 4,095 residents – a 65% increase – has been proposed in area with a current population of 6,340.

Traffic and Transit

#81

Various projects, including the near-term addition of 250 residential units at the Phelan Loop and Kragen Auto Parts site, will result in increased traffic on I-280, Ocean Avenue, Phelan Avenue and on other local streets. The *DEIR* recognizes that this increase will translate in an overall degradation of service at important intersections such as Ocean/ Geneva/ Phelan, Ocean/ I-280 On-ramp, and Ocean/ San Jose. Longer-term development will greatly aggravate this situation.

Yet the *DEIR* itself repeatedly features phrases such as "No feasible mitigation measures have been identified," and " ...would be expected to deteriorate to unacceptable levels of service...," and "...would results in significant adverse impacts." Nowhere are mitigation measures outlined that would actually reduce some of the this substantial impact. And until such measures, along with the necessary funding and implementation timeline, are identified and adopted, the developments in the Plan, including the Phelan Loop and Kragen Auto Parts Site, should not be approved.

Lack of Coordination with CCSF and Phelan Loop

#82

At previous meetings to provide information and solicit neighborhood input, including one held at Lick Wilmerding High School on July 24, 2006, local residents noted that the Municipal Transportation Agency, the Planning Department and other City agencies

#82 cont.

needed to coordinate their plans with City College of San Francisco. Development of the Balboa Park Station Area Plan along Ocean Avenue and Phelan Avenue would occur at the same time that significant development is taking place immediately adjacent at CCSF's main campus on Phelan Avenue.

In particular, it was pointed out that the proposal to re-route Muni bus traffic from the existing Phelan Loop to a route involving turns in and out of Phelan Avenue would compromise pedestrian safety and impede the movement of both buses and other vehicular traffic. The already poor performance of the Ocean/Geneva/Phelan intersection would further degrade. Nonetheless, the *DEIR* states that Muni buses, after circling clockwise around the fire station will turn right and head southbound on Phelan. Left-turns supposedly would be accommodated with a proposed "Keep Clear" zone.

With traffic on Phelan already routinely backed up at this location even without the addition of the bus traffic, it is wishful thinking to imagine that a "Keep Clear" zone is the answer to this impossible mix of too many buses, too many vehicles and too many pedestrians in much too small a space.

CCSF is well aware of this limitation and voiced its opposition to any bus re-routing which would have the buses now moving in and out from Ocean in the Phelan Loop using Phelan instead. Yet that is exactly what the flawed Plan outlines, and the *DEIR* fails completely to address the traffic safety and operational issues created by the proposed change. MTA and the Planning Department should be required to work with City College to identify a mutually acceptable traffic plan for accommodating the Muni buses that now use the Phelan Loop as a turnaround. It is ironic that projects which purport to promote transit result in a major operations and safety issue for our local bus lines.

Bicycle Lanes on Ocean and Phelan Avenues, Lack of Coordination with CCSF

#83

The proposed bicycle lanes on Ocean Avenue and Phelan Avenue as outlined in the Plan will also result in major negative impacts for which no mitigation has been identified in the *DEIR*. The bicycle lanes should not be allowed unless such measures are identified and implemented. MTA, the Planning Department and other City agencies must be required to work with City College to identify mutually acceptable bicycle routes. At previous meetings, CCSF and many residents have voice consistent opposition to removing a traffic lane from Phelan or Ocean or both in order to add bicycle lanes.

#84

It was pointed out that on Ocean, unacceptable degradation of both transit operations and intersection operation would result. And on Phelan, rather than eliminating a traffic lane and creating conflicts, it was proposed that the city work with CCSF to identify a route, possibly one that goes through the campus, that would be safer and more attractive for bicyclists. The current *DEIR* contains no indication that any consultation with the college took place, and such a joint effort to solve the issue of bicycle access must be undertaken before any changes are made to the configuration of Phelan and Ocean, major routes our residents depend on.

#85

Parking

The long-term projection for a parking shortfall of almost 1,000 spaces every weekday evening is almost as shocking as the nonexistent or woefully inadequate mitigation described in the DEIR. Vague references to possible transit improvements which are neither planned, funded or even remotely likely are not mitigation measures and no approval should be allowed based on such empty promises.

#86

Inappropriate Scale

Many who were born in Sunnyside have stayed here, attached to this quiet neighborhood which fosters a strong sense of community and which has drawn new residents who are attracted by these same qualities. While change is inevitable, change on the scale desribed in the DEIR is unnecessary and inappropriate for our part of San Francisco. To ask a neighborhood which already deals with an inordinate amount of traffic due to the presence of City College to take on waves of additional unmitigated traffic as projects are completed and the population explodes is unfair and unacceptable.

#87

Next Steps

Balboa Station is well-served by Muni and BART lines, and the city's interest in promoting development in the immediate area is understandable. It is in our interest as local residents to see that such development does not degrade our neighborhood and change its existing character.

The *Draft Environmental Impact Report, Balboa Park Station Area Plan* lays out some interesting scenarios but the City needs to address the lack of measures to mitigate the very significant negative impacts identified in the report. The Planning Department owes us more than vague descriptions of something that "could" happen. We deserve assurances that the significant impacts described in the *DEIR* are balanced with effective mitigation measures.

We look forward to the next version of the EIR incorporating the points outlined above.

Rita Evans
Secretary, Sunnyside Neighborhood Association

cc: Kate McGee, kate.mcgee@sfgov.org

November 5, 2007

Mr. Bill Wycko
SF Planning Dept.
1650 Mision St., Suite 400
SF, CA 94103

Dear Mr. Wycko,

#88

We are writing this public comment in reference to the BALBOA PARK STATION AREA PLAN.

We are surprised and confused that after many meetings where people expressed concerns regarding the height/density/size of this development that somehow, from the Plan to the Environmental Review, changes were made to lessen the open space in the reservoir area by 78% -- from 450,000 sq. ft. to 100,000 sq. ft.

(graph p. 48 of the Plan:
"Reservoir 1 575 (units) 450,000 sq. ft."
graph p. 99 of the Environmental Review:
"Reservoir 500 (units) 100,000 sq. ft."

How did this "happen"? 100,000 sq. ft. is not sufficient for the size and density of this project (1,000 units of unknown number of occupants plus the commercial units). And already existing housing density in outlying areas (esp. S. and W.) and the presence of City College and their planned high-density development, add to the necessity of implementing the planned/slated open space of 450,000 sq. ft.

Sincerely, Kim + Jason
PYchowalski

OFFICE OF THE ASSOCIATE VICE CHANCELLOR OF FACILITIES MANAGEMENT

50 PHELAN AVENUE • BOX S142 • SAN FRANCISCO, CA 94112 • 415.239.3750 • 415.239.3480 (fax)

November 5, 2007

Mr. Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
Balboa Station Area Plan DEIR
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Comments on the Balboa Station Area Plan DEIR

Dear Sir:

#89

As referenced in the DEIR, City College is preparing to develop its share of the Balboa Reservoir along Phelan Avenue. That development includes constructing an extension of Lee Avenue from the south property line, connecting to the extension of Lee Avenue included in the Balboa Area Plan, running along the west side of its development to the north end and then east to Phelan Avenue just south of Archbishop Riordan High School. This new street is considered a critical part of the Campus development to decrease traffic on Phelan Avenue, provide safe access to the remaining reservoir parking and the future buildings on the west side of Phelan Avenue.

By allowing access from Ocean onto this new street, traffic on Phelan will decrease significantly, leading to much improved pedestrian safety conditions. By allowing traffic to exit the campus parking via Lee Avenue onto Ocean, traffic conditions will, again be made safer.

City College requests right turn access on to Lee coming from the south on Ocean Avenue, allowing access to the parking and service functions within the new campus development. Further, we request that traffic exiting the Campus be allowed to turn either right or left from Lee to Ocean Avenue. City College does not believe that Lee Avenue traffic from south of Ocean should be allowed to cross Ocean and enter the Campus.

City College feels that restricting Lee Avenue access is unnecessary and would actually create adverse traffic conditions. The restrictions posed in the DEIR are based on unrealistic traffic growth projections, described in the DEIR. Therefore, on behalf of City College, I respectfully suggest that the City approve the Lee Avenue Connection to CCSF Variant as part of the Balboa Park Station Area Plan, along with a "Statement of

Overriding Considerations" for the Lee/Ocean intersection that eliminates the need for unnecessary mitigations or access restrictions that would be based on inflated growth projections.

#90

The motor vehicle traffic growth forecasts contained in the September 21, 2007 *Balboa Park Station Area Plan Draft Environmental Impact Report* (DEIR) are unreasonably inflated and should not be relied upon as the sole basis for future transportation decisions affecting the Ocean, Phelan and/or Lee Avenue corridors.

The DEIR traffic forecasts are based on theoretical traffic increases that would occur due to full build-out of the allowable land uses described in the Balboa Park Plan within a relatively short period of time. Such a large amount of development would be contrary to ABAG growth projections.

In addition, despite the transit-oriented development emphasis of the Balboa Park Plan, the traffic growth forecast assumes heavy reliance on automobiles for most trips (despite the fact that plan development would occur on a pedestrian corridor within close proximity of BART and light-rail stations). As a result, the forecasted growth in automobile traffic is further inflated.

The inflated nature of the traffic forecasts is reflected on page 171 of the DEIR, where it is stated that the Planning Department made adjustments to ABAG and SFCTA growth projections in order to account for the greater level of housing growth envisioned by the Balboa Park Plan, and to provide a "conservative estimate" of the travel demands and impacts generated by the plan. The use of "conservative" in this context does not mean the traffic forecasts are conservative; instead, this means that the traffic forecasts were adjusted upward to provide a "worst-case scenario" to be analyzed in the EIR.

As a result of the inflated traffic growth forecast contained in the DEIR, the analysis of the *Lee Avenue Connection to CCSF Variant* (summarized on page 184 of the DEIR) is overly conservative in its assessment of potential impacts. The Lee Avenue Connection to CCSF analysis stems from ongoing discussions between City College and the San Francisco Planning Department concerning the potential extension of Lee Avenue north from Ocean Avenue to provide a second access route to the new CCSF Performing Arts Center and other facilities to be located within the Balboa Reservoir. This would extend the City's existing street grid into the reservoir (supporting a key goal of the Balboa Park plan) and allow for a reduction in traffic volumes on Phelan Avenue (further facilitating the planned installation of bicycle lanes on Phelan that is called for in the Balboa Park plan).

#91

However, based on the conservative analysis contained in the DEIR, the San Francisco Planning Department recommended against allowing City College to have full access to Lee Avenue. Instead, Lee Avenue access to City College would primarily be limited to outbound travel (exiting the reservoir to Ocean via Lee) and possible inbound access via

#91 cont.

a right-turn from westbound Ocean to northbound Lee (subject to further study). Limited truck access to CCSF facilities would also be allowed under this recommendation.

Again, we believe that restricting Lee Avenue by not allowing our students and faculty access to and from the west campus development via Lee on to Ocean is unnecessary. The basis for this restriction is unrealistic and unsupportable traffic growth projections. We therefore respectfully ask that the City approve the Lee Avenue Connection to CCSF Variant as part of the Balboa Park Station Area Plan, along with a "Statement of Overriding Considerations" for the Lee/Ocean intersection that eliminates the need for unnecessary mitigations or access restrictions based on inflated growth projections.

Sincerely,

James A. Blomquist
Associate Vice Chancellor

JAB/jd

MEMORANDUM

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

From: Kevin Keck, Muni Service Planning

Subject: Comments on the Balboa Park Station Area Plan DEIR 2004.1059E

Date: November 5, 2007

#92 We have reviewed the Draft Environmental Report for the Balboa Park Station Area Plan dated September 21, 2007 and have the following additional comments. Note these comments are intended to supplement the comments already provided by the SFMTA in letter dated November 2, 2007.

We support the goals of the Balboa Park Station Area Plan to improve the Balboa Park area with housing and neighborhood improvements. However, we feel the plan does not fully examine how some of these measures will adversely impact its current function as one of the busiest transit hubs in the city, on a previously identified emerging transit corridor slated for major infrastructure improvements.

The plan does not manage the impacts of City College or BART parking and does not fully explore Muni service radiating from the project area. It does not fully examine the operations at Phelan Loop or quantify the potential impacts of the redevelopment related route changes or how the area-wide design standards will impact Muni service and performance.

#93 In terms of street space, the plan makes does not mitigate all of the impacts it identifies and there are only a few concessions to the needs of buses operating in mixed traffic, especially at those locations where congestion and project related route changes would create major delays. In some instances one would expect that these impacts could be mitigated with restricted or dedicated transit lanes.

#94 Given the importance of this regional transit hub, the transit impacts are only defined in the terms of the impacts of the new residents who will commute downtown. It is not clear what the impacts of this project will be for everyone else.

Muni Service Planning
San Francisco Municipal Railway | Department of Parking & Traffic
One South Van Ness Avenue, Seventh Fl. San Francisco, CA 94103 | Tel: 415.701.4720 | Fax: 415.701.4502 | www.sfmta.com

#95 In the past six months, Muni's ability to get ridership and performance information has increased considerably. We would welcome the opportunity to help better identify and quantify the magnitude that these impacts will have on Muni's passengers, and work towards identifying appropriate mitigations that would complement Balboa Park's accessibility and livability to all.

#96 In congested peak hour conditions, without any new signals, all buses departing the new facility will have difficulty entering Phelan. It should also be pointed out that these same buses will also have to, in a very short distance, maneuver into the left lane in order to make a left turn onto Geneva. (page 16)

#97 Consider the benefits of a new southbound dedicated curbside transit lane on Phelan Avenue. This would improve travel times on lines 36 and 43.

#98 Why is the wording concerning the bus layover facility traffic control limited to a new pedestrian-activated signal when a new traffic signal linked to both the upstream pedestrian signal and the signal at Ocean would be needed to facilitate Muni egress into the Ocean/Phelan/Geneva intersection? (page 16)

#99 Key import is give to the provision of new landscaped medians along Geneva, Ocean and Phelan Avenues, but there is little discussion on how these landscaped medians and corner modifications will impact future transportation improvements (like dedicated transit lanes) in the study area. (page 40) Such landscaping may be appropriate in some locations, and not in others given future transit needs. This document makes no such distinction.

#100 Implementation of the Proposed Area Plan would cause "substantial" congestion on Phelan and Ocean Avenue that would directly and adversely impact Muni service. These impacts are alluded to, but these congestion related impacts have not been specifically identified. (page 44)

#101 It is not clear if this document has referenced Muni's 2006 Short Range Transit Plan (SRTP). (We can not find a reference to it in the DEIR). In Muni's SRTP, in the Service Planning and Expansion section, reference is made to "A Vision for Rapid Transit in San Francisco (February 2002). The "Vision Plan" has identified Geneva and Ocean Avenues as key corridors that should be considered for a future BRT or LRT improvements. A key interim step recommended by the Vision Plan is the establishment of an exclusive ROW for the K Line on Ocean Avenue.

What findings in the preliminary transportation analysis caused the dedicated LRT lanes on Ocean between Phelan Avenue and Mannor to be removed from the Area Plan? (page 85)

#102 The Muni SRTP (page 50) also lists Geneva Avenue and Ocean Avenue as two of the City's twenty key transit corridor infrastructure improvement projects. This Draft EIR does not fully discus how this area plan would meets Muni's goals to:

1. Integrate local and regional transit into a seamless network

#102 cont.

2. Physically separate transit service from automobile on major corridors by creating exclusive rights of way
3. Provide high capacity, rapid transit style service on major corridors
4. Upgrade transit service in increments as ridership builds and as funding becomes available.

#103 The plan as it is presented in this DEIR, does not fully identify how its congestion inducing recommendations and limited number of transit lane dedications and signal modifications will hamper Muni service and degrade service for the large number of transit passengers who ride Muni's surface lines to and through the project area.

#104 Was the new Phelan Loop Site Bus Terminal Exit on Phelan one of the study intersections? (page 44)

#105 Why have new traffic transit priority signal controls at the bus layover exit at Phelan and Ocean not been identified as a mitigation measure? (page 43)

#106 Please clarify the statement about transit impact fees to purchase and operate additional cars and service not being a mitigation. Why is the statement made that "these measures could not be funded or implemented by MTA"? Why would MTA be obligated to pay transit impact fees? (page 44)

#107 The design and tightening of turning radii of the entry into the new Phelan terminal should also be done in a manner to safely accommodate the passage of the 190 Muni transit vehicles that use this terminal each day. (page 82)

#108 The terminal should be designed so that buses waiting to enter the new Phelan terminal would not block the fire station's driveway.

#109 At the corner of San Jose and Geneva, where will corner bulbs be installed and how large will they be? (page 82)

#110 How will the proposed changes at San Jose and Geneva impact existing bus performance on the westbound Geneva Avenue approach south of San Jose? (page 82)

#111 Without any direction arrow, street names or curb lines visible, it is difficult to understand what Figure 5, 'Proposed Transit Reconfiguration' is illustrating. (page 84)

#112 This figure does not illustrate the reduction in size of the terminal, or the proposed new circulation paths or layover location and capacity of buses within the new terminal very well. (page 87 Figure 6)

#113 How does the selection of a p.m. peak period between 5:00 and 6:00 p.m. correspond to the (earlier?) traffic flows generated by CCSF. (page 163)

#114 The 9X does not provide service to the Civic Center Area. The 91 Owl Service is not mentioned. (page 166)

#115 The hours of Golden Gate Ferry Service to Larkspur are mentioned, but there is no discussion as to what kind of regional Service would be provided in the late evening and early morning hours ...when the BART station is closed and the trains are not running. (page 167)

#116 (page 167): Why does the transit analysis focus on "commuters" rather than a broader "person-movement-based performance measure" as suggested by Policy 5.1 in the Key Strategy section (page 248).

#117 Why does the transit analysis examine BART ridership on-board trains departing Civic Center (page 168), but not include information about passenger exits at the Balboa BART station itself?

#118 Why does the analysis of transit conditions focuses on "commute access to and from the downtown area" (page 168) and the analyses excludes other major lines because they "do not carry as high a percentage of commuters." (page 168) What percentage of the total transit activity at this hub is represented by commuters traveling downtown? Recent studies indicate that Geneva is extremely important.

#119 The statement "the majority of weekday evening commute transit trips to the Project Area may originate from origins in the downtown area" (page 168) should be annotated with its source.

#120 (page B-3) The Existing Ridership figures in the Table b.2-3 Transit Capacity Utilization should have source information and date information.

#121 It is not clear from this report how many people park their cars to access local and regional transit connections at Balboa Park. How much money would a regional BART commuter save by parking on-street at an uncontrolled location rather than a BART parking lot in San Mateo County? (page 168)

#122 How much money would a student save by parking on-street at an uncontrolled location in the study area rather than in the CCSF reservoir parking lot? (page 168)

#123 It would be helpful to include the analysis supporting the assertion about on-street parking demands and turnover rates on Ocean Avenue. (page 205)

#124 Are there any instances in the City where a "shared parking arrangement" proposed for the Kragen site works? (page 205)

#125 The relationship between various bus stop locations and the transit station entrances is not addressed. Midday pedestrian volumes associated with the CCSF class schedule (page 169) are mentioned in passing but the magnitude of this is neither adequately quantified nor described.

#126 The discussion of bicycle conditions excludes a discussion of the rails in the street within the study area.

What is the number of bicycle trips generated by CCSF (page 170)?

To what degree would these bicycle trips conflict with weekday commute trips?

#127 What constitutes a "major bus line"? The 9X/AX/BX service is mentioned here, but the 2025 ridership on these lines are not included. (Table 14 on page 187).

#128 "Average annual growth rates for Muni lines that serve both the Project Area and downtown was established at about 0.25". (page 172) Does this mean that the 2025 growth projections were based on screenlines crossing radial transit routes between the downtown and the project area, or that the 2025 growth rate was only applied to radial routes between the downtown and the project area?

#129 It is unclear how the aggregation of major bus lines and rail lines was performed. Were all of the links used by the 10 lines (page 166) that directly serve the project area included in the aggregated total? (page 172)

#130 Was an average annual growth rates used for crosstown Muni lines the same as the radial lines that serve the Project Area and Downtown?

#131 Please note that Muni's web site has a new name, footnote 11 (page 172) should now be http://www.sfmta.com/cms/mthird/3rdover.htm In this same footnote, it is unclear which lines were used for the ridership estimates, and when the ridership information was collected in relation to the start-up of the Third Street T-Line.

#132 Why was the BART ridership model used to develop the BART ridership projections and not the SFCTA's? (page 172) Are BART's projections consistent with the SFCTA's projections?

Was the BART ridership model used to forecast the additional number of vehicles dropping passengers off or parking in the vicinity of the Balboa Park Station? (page 172)

#133 Given the importance of this area as a transit hub, the analysis of transit impacts seems inappropriately limited to traditional "commute routes" and excludes the fact that CCSF is a special generator and that modal connections made in the project area to a variety of locations. (Table 14, pages 186-187)

#134 The discussion of project related transit impacts needs to explain why the analysis screen lines are over three miles away from the project and why the 29, 9X/9AX/9BX (or the former 15) routes have not been included.

#135 The discussion of peak parking demand (on page 174) states that peak demand would be in the evening, but on page 169, there is a mention that in the vicinity of CCSF when classes are in

#135 cont.

session, parking spaces tend to be "completely full" (?) throughout the day. It would be helpful to have more quantitative information about existing parking demands that could support the assertion that the project parking demands are highest in the evening. (page 174)

Have any CCSF 2025 parking demands been forecast into this document?

#136

It would be good to see an illustration of the condition where a truck longer than 30 ft tries to access the loading dock from Ocean Avenue. Would a 53' trailer be able to make this movement? (page 207)

Are there any other locations in the City where loading dock personnel are "stationed" at corners to assist truck maneuvers and manage traffic flows? (page 340)

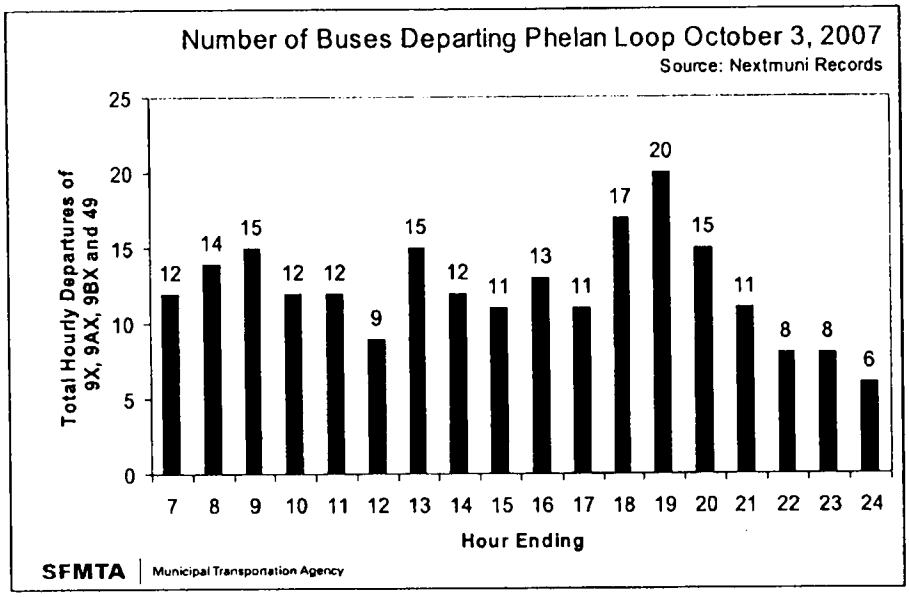
Would the loading docks be designed to accommodate trucks with 53' trailers.
How would the movement of these trucks impact Muni vehicles? Is there a location where the trucks could layover while waiting for a dock? (page 177)

#137

According to the DEIR, the reconfiguration of the Phelan Loop terminal and the changes at the Ocean/Geneva/Phelan intersection would have a significant unavoidable impact on Muni Operations. How will this impact be mitigated? (page 182)

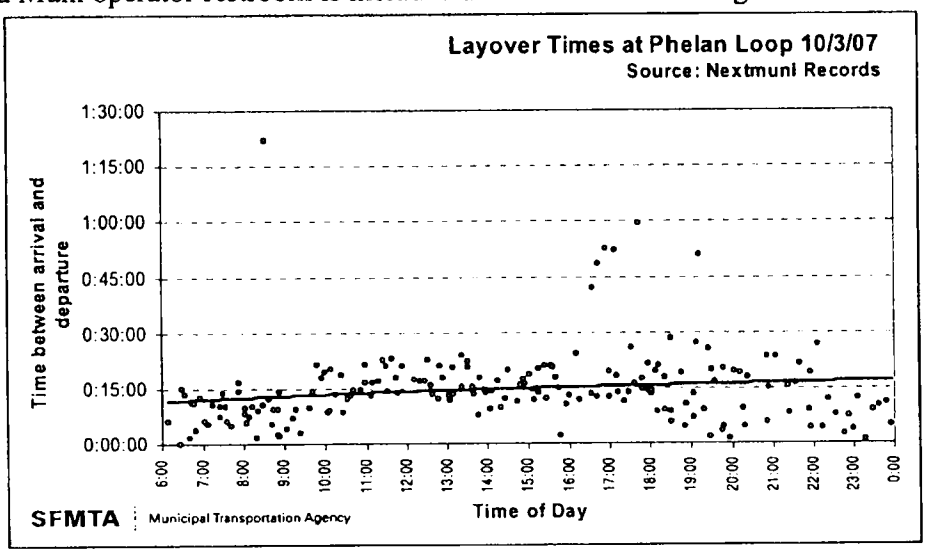
#138

The Phelan Loop currently serves as a layover point for 9X, 9AX, 9BX and 49 Lines. The document indicates that "about 14 buses would depart the new loop site during the peak hour of operation. (page 198) Our records show that during an hour of Phelan Loops operations (6:20 pm to 7:20pm 10/3/07) up to 21 buses can leave depart the Phelan Loop, or more than one every three minutes.



#138 cont.

The discussion of the Phelan Loop operations (page 97) does not acknowledge that this loop facility serves as a terminal layover point for all the lines that use it. At his location, Muni buses layover for an average of just over 15 minutes. It should also be pointed out in this document that a Muni operator restroom is included in the terminal re-design.



#139

Why has an upstream signal on Phelan at the Reservoir driveway, or at the exit itself been excluded from this discussion? Such a control device (at a location described on page 85, illustrated in Figure 6 on page 86 or similar to the existing traffic control device described on page 188) could be designed to provide Muni coaches the gaps they need to exit the new terminal and a way to improve pedestrian safety.

Why would the Bus loop departure only be connected to the upstream pedestrian signal and not the intersection at Ocean Avenue and Phelan? (page 85, footnote 4)

#140

Given the stated Key Strategies (page 248) which seeks to assess performance based on person movements rather than vehicle movements, total transit passenger delays should be called out and quantified here.

#141

Would the residential project meet Title 24 noise insulation requirements if the windows on the dwelling units directly over the bus layover yard were opened? Would the windows be sealed above the yard? (page 220)

What would be the noise levels of the relocated yard if buses are required to turn off their engines during their fifteen minute layovers and use their compressed air starters in this layover area? (page 220)

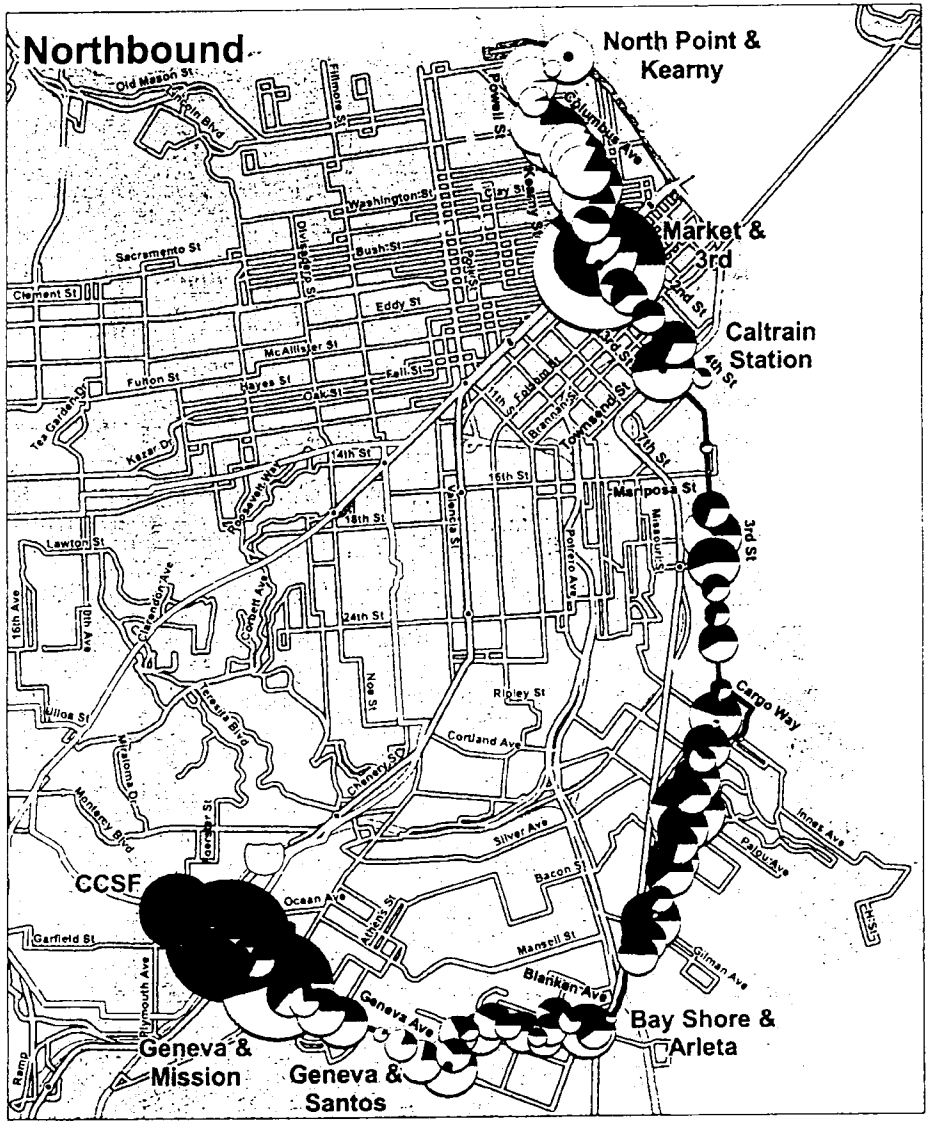
#142

It should be clarified who shall be responsible for the installation of the upgraded ventilation systems identified in AQ-2 and where exactly in the Phelan Loop Site they shall be located. We interpret this to mean the residential developer is responsible but it could also be interpreted that the MTA is responsible for installing filters at its facility. (page 46)

#143 Is the Air Quality analysis of the Ocean Avenue/Geneva Avenue/Phelan intersection based on traffic volume changes alone? Are the rerouted Muni buses exiting Phelan accounted for in this analysis as trucks or vehicles alone? (page 257)

#144 How come the reconfigured bus loop exit on Phelan where up to 20 buses an hour will be waiting to exit and enter traffic across a intersection recommended to be painted with a "KEEP CLEAR" pavement marking is not part of this analysis? (page 257)

#145 Are there any existing locations in the region where residents have been provided with upgraded ventilation systems that "allow residents to close windows and ventilate/filter air mechanically"? Is ventilating the same as filtering in this context? (page 260)



Line 15 - Third Street

Passenger Activity

Ons / Offs

1,000

500

250

Legend

- Featured Line
- Existing Bus Network
- Freeway/Highway
- Muni Metro
- Cable Car
- Historic Streetcar
- BART
- CALTRAIN

SFMTA | Municipal Transportation Agency

Primary Data Source
SFMTA APC Data
Data Collected Fall 2006 - Spring 2007

Secondary Data Sources
SFCTA, SFGOV, MTC, NTAD

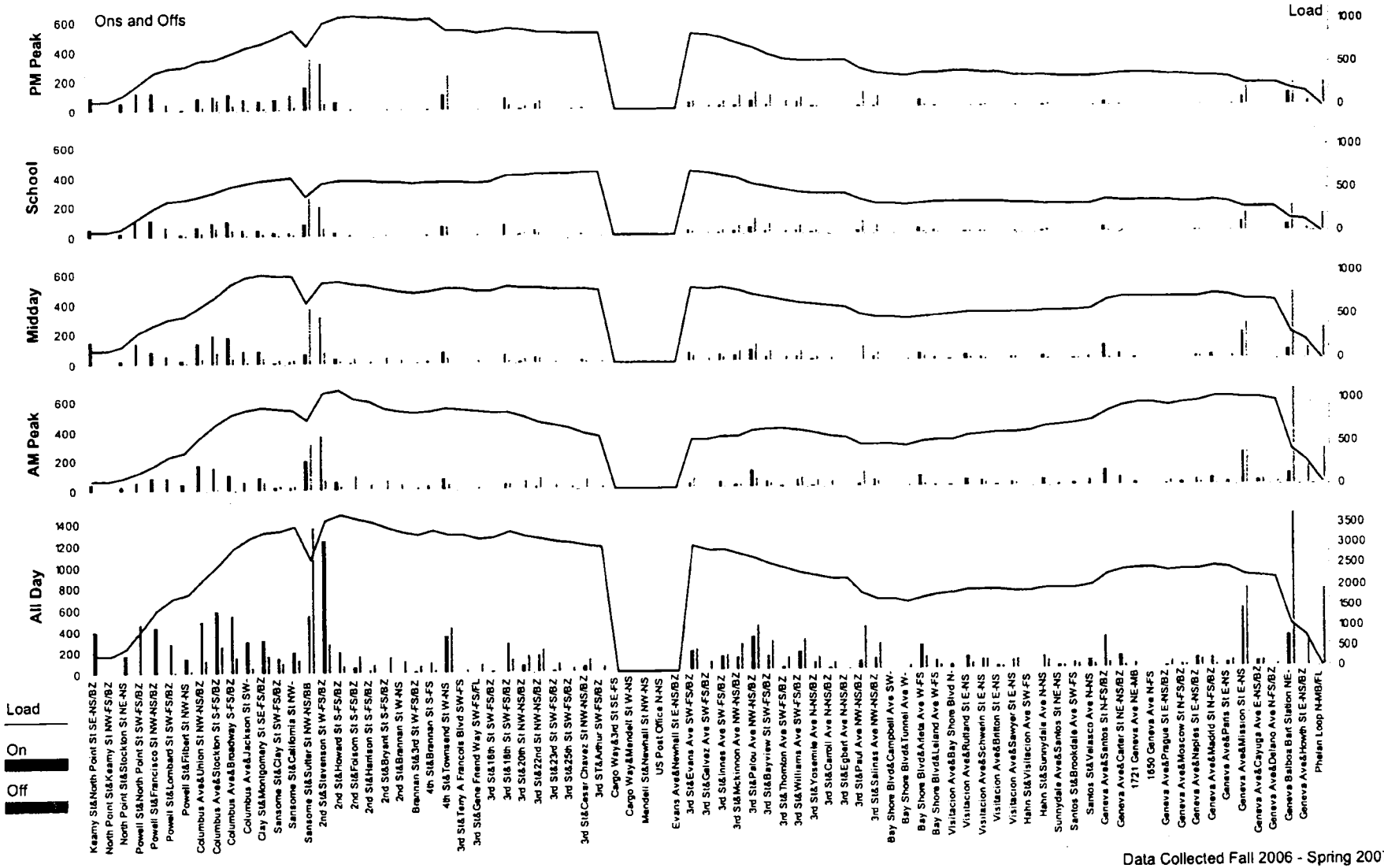
0 0.5 1 2 Miles

TMD

Passenger Activity Graph

SF Muni
15 THIRD STREET -MOTORCOACH ARTICULAT

Weekday
To City College



Data Collected Fall 2006 - Spring 2007

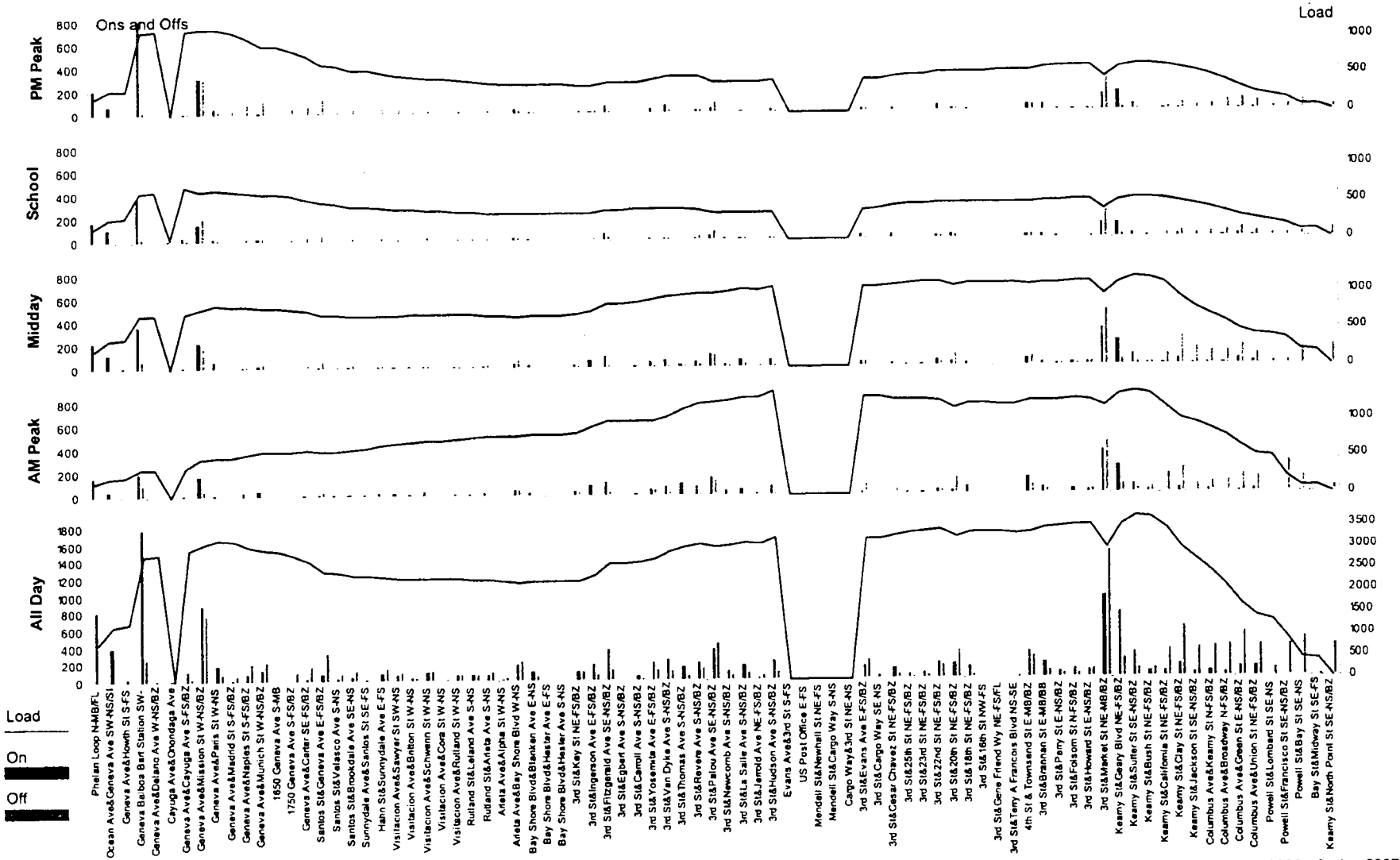
Passenger Activity Graph

SF Muni

15 THIRD STREET -MOTORCOACH ARTICULAT

Weekday

To Kearny & North Point



Data Collected Fall 2006 - Spring 2007

SF MTA

15 THIRD STREET -MOTORCOACH ARTICULATED

To City College

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary	
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)
Kearny St&North Point St SE-NS/BZ to Columbus Ave&Union St NW-NS/BZ	5.0	7.2	2.2	6.8	7.5	0.7	7.9	7.7	-0.2	7.5	8.3	0.8	6.5	6.9	0.5	4.8	6.5	1.7	6.4	7.4
Columbus Ave&Union St NW-NS/BZ to Columbus Ave&Jackson St SW-FS/BZ	3.8	4.3	0.5	4.2	5.0	0.8	5.0	5.1	0.1	6.0	5.6	-0.4	4.5	4.9	0.4	3.1	3.9	0.8	4.4	4.9
Columbus Ave&Jackson St SW-FS/BZ to Sansome St&Sutter St NW-NS/BB							10.0	3.9	-6.2										10.0	3.9
Columbus Ave&Jackson St SW-FS/BZ to 2nd St&Stevenson St W-FS/BZ	6.8	7.1	0.3	8.2	7.5	-0.7	10.0	9.2	-0.8	8.1	8.9	0.7	5.5	6.4	0.9	4.1	5.6	1.5	7.3	7.5
2nd St&Stevenson St W-FS/BZ to 4th St&Townsend St W-NS	9.0	8.1	-0.9	9.2	8.4	-0.8	11.6	9.4	-2.2	10.9	9.4	-1.4	7.0	6.2	-0.8	6.2	5.8	-0.4	9.1	8.1
4th St&Townsend St W-NS to 3rd St&20th St NW-NS/BZ	6.3	6.7	0.5	7.0	7.7	0.7	7.0	8.1	1.1	6.5	6.8	0.3	4.6	5.5	0.9	4.0	4.9	0.9	6.1	6.8
3rd St&20th St NW-NS/BZ to US Post Office N-NS																4.8	4.3	-0.5	4.8	4.3
3rd St&20th St NW-NS/BZ to 3rd St&Palou Ave NW-NS/BZ	9.6	9.7	0.0	11.5	10.9	-0.6	12.0	11.8	-0.2	11.0	10.0	-1.0	8.4	7.5	-0.9	7.4	7.4	-0.1	10.4	9.9
US Post Office N-NS to 3rd St&Palou Ave NW-NS/BZ																4.0	4.0	-0.0	4.0	4.0
3rd St&Palou Ave NW-NS/BZ to Bay Shore Blvd&Arleta Ave W-FS	8.4	9.5	1.0	9.0	10.2	1.2	9.0	10.5	1.5	9.0	9.4	0.4	7.9	7.4	-0.5	7.2	6.7	-0.5	8.5	9.2
Bay Shore Blvd&Arleta Ave W-FS to Geneva Ave&Santos St N-FS/BZ	7.0	8.4	1.3	8.0	8.5	0.5	8.0	8.9	0.9	7.0	7.9	0.9	6.0	6.6	0.6	6.0	6.1	0.1	7.1	7.9
Geneva Ave&Santos St N-FS/BZ to Geneva Ave&Mission St E-NS	6.6	7.0	0.4	5.5	6.5	1.0	5.8	6.7	0.9	5.3	6.0	0.7	4.2	4.7	0.5	3.6	4.3	0.7	5.3	6.0
Geneva Ave&Mission St E-NS to Phelan Loop N-MB/FL	6.0	8.0	2.0	6.0	6.8	0.8	6.0	7.2	1.2	6.8	7.1	0.2	5.3	5.7	0.5	4.7	5.3	0.6	5.9	6.8
Direction Total	68.6	76.0	7.4	75.4	79.0	3.6	92.3	88.5	-3.8	78.1	79.3	1.2	59.7	61.8	2.1	59.9	64.7	4.8	89.3	86.6

To Kearny & North Point

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary	
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)
Phelan Loop N-MB/FL to Geneva Ave&Mission St W-NS/BZ	5.7	6.5	0.8	6.0	6.6	0.6	6.7	8.5	1.8	7.0	8.7	1.7	5.1	6.7	1.5	4.7	6.5	1.9	5.9	7.2
Cayuga Ave&Onondaga Ave to Geneva Ave&Mission St W-NS/BZ							16.0	7.1	-8.9										16.0	7.1
Geneva Ave&Mission St W-NS/BZ to Santos St&Geneva Ave E-FS/BZ	5.5	7.0	1.4	6.9	7.2	0.2	7.0	7.7	0.7	7.0	8.1	1.1	6.1	6.5	0.4	5.0	5.3	0.3	6.3	7.1
Santos St&Geneva Ave E-FS/BZ to Arleta Ave&Bay Shore Blvd W-NS	7.0	8.7	1.7	7.0	8.3	1.3	7.0	8.8	1.8	7.0	8.5	1.5	6.4	7.4	1.0	6.0	6.8	0.8	6.8	8.2
Arleta Ave&Bay Shore Blvd W-NS to 3rd St&Palou Ave SE-NS/BZ	9.0	10.7	1.7	10.0	10.8	0.8	10.0	10.6	0.6	8.9	9.8	0.9	7.8	7.5	-0.3	7.4	7.2	-0.2	9.0	9.8
3rd St&Palou Ave SE-NS/BZ to US Post Office E-FS																3.6	4.1	0.6	3.6	4.1
3rd St&Palou Ave SE-NS/BZ to 3rd St&20th St NE-FS/BZ	9.4	9.6	0.1	10.0	11.3	1.3	10.0	11.2	1.2	8.5	9.1	0.6	7.1	7.4	0.3	7.5	7.4	-0.1	9.1	9.8
US Post Office E-FS to 3rd St&20th St NE-FS/BZ																4.7	4.8	0.0	4.7	4.8
3rd St&20th St NE-FS/BZ to 4th St & Townsend St E-MB/BZ	7.7	7.6	-0.2	8.0	8.0	0.0	8.0	7.9	-0.1	6.4	7.4	1.0	4.0	6.3	2.3	4.5	5.8	1.3	6.9	7.4
4th St & Townsend St E-MB/BZ to Kearny St&Geary Blvd NE-FS/BZ	11.1	9.1	-2.0	13.3	10.4	-2.8	15.0	10.0	-5.0	12.3	10.1	-2.2	6.5	7.1	0.6	6.1	6.0	-0.1	11.2	9.1
Kearny St&Geary Blvd NE-FS/BZ to Columbus Ave&Kearny St N-FS/BZ	7.9	6.4	-1.4	8.7	7.0	-1.6	9.0	7.0	-2.0	7.6	5.9	-1.7	4.9	4.8	-0.1	4.7	4.1	-0.6	7.5	6.1
Columbus Ave&Kearny St N-FS/BZ to Columbus Ave&Union St NE-FS/BZ	3.0	3.9	0.9	3.6	4.6	1.0	4.0	4.9	0.9	4.0	4.3	0.3	3.4	3.2	-0.1	2.4	2.7	0.3	3.4	4.0
Columbus Ave&Union St NE-FS/BZ to Kearny St&North Point St SE-NS/BZ	4.0	4.8	0.8	4.8	4.4	-0.3	5.0	5.2	0.2	4.7	5.3	0.7	4.0	4.1	0.1	3.5	4.6	1.1	4.4	4.7
Direction Total	70.4	74.2	3.7	78.2	78.6	0.4	97.7	88.9	-8.8	73.3	77.1	3.7	55.3	60.9	5.7	60.1	65.4	5.3	94.8	89.4

Times are in decimal minutes.

SF MTA

15 THIRD STREET -MOTORCOACH ARTICULATED

To City College

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)
Kearny St&North Point St SE-NS/BZ to Columbus Ave&Union St NW-NS/BZ	9.3	6.5	-2.8	6.9	6.2	-0.6	5.9	6.0	0.1	6.2	5.7	-0.6	7.2	6.7	-0.5	9.7	7.2	-2.5	7.3	6.3	-1.0
Columbus Ave&Union St NW-NS/BZ to Columbus Ave&Jackson St SW-FS/BZ	7.2	6.4	-0.8	6.6	5.5	-1.1	5.5	5.4	-0.1	4.6	4.9	0.3	6.2	5.7	-0.5	9.0	7.1	-1.9	6.2	5.7	-0.5
Columbus Ave&Jackson St SW-FS/BZ to Sansome St&Sutter St NW-NS/BB							3.3	8.6	5.3										3.3	8.6	5.3
Columbus Ave&Jackson St SW-FS/BZ to 2nd St&Stevenson St W-FS/BZ	6.6	6.3	-0.3	5.4	5.9	0.5	4.4	4.8	0.4	5.5	5.0	-0.4	8.1	7.0	-1.1	10.7	7.9	-2.8	6.1	5.9	-0.2
2nd St&Stevenson St W-FS/BZ to 4th St&Townsend St W-NS	7.5	8.2	0.8	7.3	8.0	0.7	5.8	7.1	1.3	6.2	7.1	0.9	9.6	10.8	1.2	10.8	11.6	0.8	7.4	8.3	0.9
4th St&Townsend St W-NS to 3rd St&20th St NW-NS/BZ	12.1	11.3	-0.8	10.9	9.9	-1.0	10.9	9.4	-1.5	11.7	11.2	-0.5	16.6	14.0	-2.6	19.0	15.5	-3.6	12.5	11.2	-1.3
3rd St&20th St NW-NS/BZ to US Post Office N-NS																18.9	21.0	2.1	18.9	21.0	2.1
3rd St&20th St NW-NS/BZ to 3rd St&Palou Ave NW-NS/BZ	11.7	11.7	-0.0	9.8	10.3	0.5	9.4	9.6	0.2	10.3	11.3	1.0	13.4	15.0	1.6	15.2	15.3	0.1	10.9	11.4	0.5
US Post Office N-NS to 3rd St&Palou Ave NW-NS/BZ																12.6	12.6	0.0	12.6	12.6	0.0
3rd St&Palou Ave NW-NS/BZ to Bay Shore Blvd&Arleta Ave W-FS	13.0	11.6	-1.4	12.2	10.7	-1.5	12.2	10.5	-1.7	12.2	11.6	-0.6	14.0	14.8	0.9	15.3	16.3	1.0	12.9	12.0	-0.9
Bay Shore Blvd&Arleta Ave W-FS to Geneva Ave&Santos St N-FS/BZ	11.6	9.8	-1.8	10.2	9.6	-0.6	10.2	9.2	-1.0	11.6	10.3	-1.3	13.6	12.4	-1.2	13.6	13.4	-0.2	11.4	10.4	-1.1
Geneva Ave&Santos St N-FS/BZ to Geneva Ave&Mission St E-NS	11.3	10.6	-0.7	13.5	11.5	-2.0	12.9	11.1	-1.7	14.1	12.5	-1.6	17.7	15.8	-1.9	20.7	17.4	-3.3	14.0	12.4	-1.6
Geneva Ave&Mission St E-NS to Phelan Loop N-MB/FL	8.9	6.7	-2.2	8.9	7.8	-1.1	8.9	7.4	-1.5	7.8	7.6	-0.3	10.1	9.3	-0.8	11.3	10.1	-1.2	9.0	7.8	-1.2
Direction Total	10.1	9.1	-1.0	9.2	8.8	-0.4	7.9	8.2	0.3	8.9	8.8	-0.1	11.6	11.2	-0.4	13.9	12.9	-1.0	9.7	10.0	0.3

To Kearny & North Point

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)
Phelan Loop N-MB/FL to Geneva Ave&Mission St W-NS/BZ	9.5	8.3	-1.2	9.0	8.2	-0.8	8.0	6.4	-1.7	7.7	6.2	-1.5	10.5	8.1	-2.4	11.6	8.2	-3.3	9.1	7.5	-1.6
Cayuga Ave&Onondaga Ave to Geneva Ave&Mission St W-NS/BZ							2.1	4.6	2.6										2.1	4.6	2.6
Geneva Ave&Mission St W-NS/BZ to Santos St&Geneva Ave E-FS/BZ	14.2	11.3	-2.9	11.3	11.0	-0.3	11.2	10.2	-1.1	11.2	9.7	-1.5	12.9	12.2	-0.8	15.7	14.8	-0.9	12.4	11.1	-1.3
Santos St&Geneva Ave E-FS/BZ to Arleta Ave&Bay Shore Blvd W-NS	11.8	9.6	-2.3	11.8	10.0	-1.8	11.8	9.4	-2.4	11.8	9.7	-2.1	13.0	11.2	-1.8	13.8	12.2	-1.6	12.2	10.1	-2.0
Arleta Ave&Bay Shore Blvd W-NS to 3rd St&Palou Ave SE-NS/BZ	11.2	9.5	-1.7	10.1	9.4	-0.7	10.1	9.6	-0.5	11.4	10.4	-1.1	13.0	13.6	0.5	13.7	14.0	0.3	11.2	10.3	-0.9
3rd St&Palou Ave SE-NS/BZ to US Post Office E-FS																14.4	12.5	-2.0	14.4	12.5	-2.0
3rd St&Palou Ave SE-NS/BZ to 3rd St&20th St NE-FS/BZ	12.0	11.8	-0.2	11.3	10.1	-1.3	11.3	10.1	-1.2	13.4	12.5	-0.9	15.9	15.3	-0.6	15.1	15.3	0.2	12.4	11.6	-0.9
US Post Office E-FS to 3rd St&20th St NE-FS/BZ																19.1	18.9	-0.2	19.1	18.9	-0.2
3rd St&20th St NE-FS/BZ to 4th St & Townsend St E-MB/BZ	9.7	9.9	0.2	9.4	9.4	-0.0	9.4	9.5	0.1	11.8	10.2	-1.6	18.8	11.8	-6.9	16.5	12.9	-3.7	10.9	10.2	-0.7
4th St & Townsend St E-MB/BZ to Kearny St&Geary Blvd NE-FS/BZ	5.8	7.1	1.3	4.9	6.2	1.3	4.3	6.5	2.2	5.3	6.4	1.1	10.0	9.2	-0.8	10.7	10.8	0.1	5.8	7.1	1.3
Kearny St&Geary Blvd NE-FS/BZ to Columbus Ave&Kearny St N-FS/BZ	4.9	6.1	1.1	4.5	5.6	1.1	4.3	5.5	1.2	5.1	6.6	1.5	7.9	8.1	0.2	8.2	9.5	1.3	5.2	6.4	1.2
Columbus Ave&Kearny St N-FS/BZ to Columbus Ave&Union St NE-FS/BZ	6.8	5.2	-1.6	5.7	4.4	-1.3	5.1	4.2	-0.9	5.1	4.8	-0.3	6.1	6.3	0.2	8.5	7.6	-0.9	6.0	5.1	-1.0
Columbus Ave&Union St NE-FS/BZ to Kearny St&North Point St SE-NS/BZ	10.3	8.7	-1.7	8.7	9.3	0.6	8.3	7.9	-0.4	8.9	7.8	-1.1	10.3	10.1	-0.3	11.7	9.0	-2.7	9.5	8.7	-0.8
Direction Total	9.5	9.0	-0.5	8.6	8.5	-0.0	7.2	7.9	0.7	9.1	8.7	-0.4	12.1	11.0	-1.1	13.5	12.4	-1.1	8.9	9.5	0.5

Route Total	9.8	9.1	-0.7	8.9	8.7	-0.2	7.5	8.1	0.5	9.0	8.7	-0.3	11.9	11.1	-0.7	13.7	12.7	-1.1	9.3	9.7	0.4

Speeds in miles per hour (MPH).

Operating Speeds (excluding dwell)

Weekday

SF MTA
15 THIRD STREET -MOTORCOACH ARTICULATED

To City College

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)
Kearny St&North Point St SE-NS/BZ to Columbus Ave&Union St NW-NS/BZ	9.3	7.8	-1.5	6.9	7.7	0.8	5.9	7.9	2.0	6.2	7.0	0.7	7.2	7.7	0.4	9.7	8.1	-1.7	7.3	7.6	0.3
Columbus Ave&Union St NW-NS/BZ to Columbus Ave&Jackson St SW-FS/BZ	7.2	7.6	0.5	6.6	7.0	0.5	5.5	7.0	1.5	4.6	5.9	1.3	6.2	6.4	0.2	9.0	8.2	-0.8	6.2	6.9	0.7
Columbus Ave&Jackson St SW-FS/BZ to Sansome St&Sutter St NW-NS/BB							3.3	8.7	5.4										3.3	8.7	5.4
Columbus Ave&Jackson St SW-FS/BZ to 2nd St&Stevenson St W-FS/BZ	6.6	9.2	2.6	5.4	8.1	2.7	4.4	7.4	2.9	5.5	7.6	2.2	8.1	8.8	0.7	10.7	10.0	-0.7	6.1	8.4	2.3
2nd St&Stevenson St W-FS/BZ to 4th St&Townsend St W-NS	7.5	10.0	2.5	7.3	9.6	2.3	5.8	8.6	2.8	6.2	8.7	2.5	9.6	12.1	2.5	10.8	12.7	1.8	7.4	9.9	2.5
4th St&Townsend St W-NS to 3rd St&20th St NW-NS/BZ	12.1	12.1	-0.0	10.9	11.5	0.6	10.9	11.3	0.4	11.7	12.4	0.7	16.6	14.7	-1.9	19.0	16.1	-3.0	12.5	12.5	0.0
3rd St&20th St NW-NS/BZ to US Post Office N-NS																18.9	21.9	3.0	18.9	21.9	3.0
3rd St&20th St NW-NS/BZ to 3rd St&Palou Ave NW-NS/BZ	11.7	14.0	2.3	9.8	12.5	2.7	9.4	12.1	2.7	10.3	13.6	3.3	13.4	17.2	3.8	15.2	17.4	2.2	10.9	13.7	2.8
US Post Office N-NS to 3rd St&Palou Ave NW-NS/BZ																12.6	13.9	1.3	12.6	13.9	1.3
3rd St&Palou Ave NW-NS/BZ to Bay Shore Blvd&Arleta Ave W-FS	13.0	14.1	1.1	12.2	13.1	0.9	12.2	12.8	0.6	12.2	13.8	1.6	14.0	17.0	3.0	15.3	18.2	3.0	12.9	14.3	1.4
Bay Shore Blvd&Arleta Ave W-FS to Geneva Ave&Santos St N-FS/BZ	11.6	11.9	0.3	10.2	11.6	1.4	10.2	11.2	1.0	11.6	11.8	0.3	13.6	13.5	-0.1	13.6	14.6	1.0	11.4	12.2	0.7
Geneva Ave&Santos St N-FS/BZ to Geneva Ave&Mission St E-NS	11.3	14.1	2.8	13.5	14.7	1.2	12.9	13.8	0.9	14.1	14.7	0.6	17.7	17.5	-0.3	20.7	19.6	-1.0	14.0	15.2	1.2
Geneva Ave&Mission St E-NS to Phelan Loop N-MB/FL	8.9	7.5	-1.4	8.9	8.6	-0.3	8.9	8.3	-0.6	7.8	8.3	0.5	10.1	9.9	-0.3	11.3	10.5	-0.8	9.0	8.6	-0.5
Direction Total	10.1	11.1	1.0	9.2	10.7	1.5	7.9	10.2	2.3	8.9	10.6	1.7	11.6	12.6	1.0	13.9	14.3	0.4	9.7	11.8	2.1

To Kearny & North Point

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)	Scheduled (MPH)	Actual (MPH)	Difference (MPH)
Phelan Loop N-MB/FL to Geneva Ave&Mission St W-NS/BZ	9.5	9.9	0.4	9.0	10.4	1.4	8.0	8.3	0.3	7.7	8.1	0.4	10.5	10.2	-0.3	11.6	9.6	-2.0	9.1	9.4	0.3
Cayuga Ave&Onondaga Ave to Geneva Ave&Mission St W-NS/BZ							2.1	5.3	3.2										2.1	5.3	3.2
Geneva Ave&Mission St W-NS/BZ to Santos St&Geneva Ave E-FS/BZ	14.2	12.4	-1.8	11.3	12.4	1.1	11.2	11.9	0.6	11.2	11.7	0.5	12.9	13.8	0.8	15.7	16.4	0.7	12.4	12.7	0.3
Santos St&Geneva Ave E-FS/BZ to Arleta Ave&Bay Shore Blvd W-NS	11.8	11.8	-0.1	11.8	12.4	0.5	11.8	11.9	0.1	11.8	12.2	0.3	13.0	12.9	-0.1	13.8	13.9	0.1	12.2	12.4	0.2
Arleta Ave&Bay Shore Blvd W-NS to 3rd St&Palou Ave SE-NS/BZ	11.2	11.9	0.7	10.1	11.9	1.7	10.1	12.2	2.1	11.4	12.8	1.4	13.0	15.4	2.3	13.7	16.0	2.3	11.2	12.8	1.6
3rd St&Palou Ave SE-NS/BZ to US Post Office E-FS																14.4	14.3	-0.2	14.4	14.3	-0.2
3rd St&Palou Ave SE-NS/BZ to 3rd St&20th St NE-FS/BZ	12.0	13.8	1.8	11.3	12.6	1.2	11.3	12.7	1.4	13.4	15.1	1.7	15.9	17.1	1.2	15.1	17.1	2.0	12.4	14.0	1.5
US Post Office E-FS to 3rd St&20th St NE-FS/BZ																19.1	21.0	1.9	19.1	21.0	1.9
3rd St&20th St NE-FS/BZ to 4th St & Townsend St E-MB/BZ	9.7	11.1	1.4	9.4	10.2	0.8	9.4	10.3	0.9	11.8	11.1	-0.6	18.8	12.4	-6.4	16.5	13.4	-3.1	10.9	11.1	0.1
4th St & Townsend St E-MB/BZ to Kearny St&Geary Blvd NE-FS/BZ	5.8	8.9	3.0	4.9	7.7	2.8	4.3	8.0	3.7	5.3	7.9	2.6	10.0	10.6	0.6	10.7	12.8	2.1	5.8	8.7	2.9
Kearny St&Geary Blvd NE-FS/BZ to Columbus Ave&Kearny St N-FS/BZ	4.9	7.6	2.6	4.5	7.4	2.9	4.3	7.3	3.0	5.1	8.3	3.1	7.9	9.6	1.6	8.2	11.2	3.0	5.2	8.1	2.9
Columbus Ave&Kearny St N-FS/BZ to Columbus Ave&Union St NE-FS/BZ	6.8	6.7	-0.1	5.7	6.1	0.4	5.1	5.9	0.8	5.1	6.1	1.0	6.1	7.5	1.4	8.5	8.6	0.1	6.0	6.5	0.5
Columbus Ave&Union St NE-FS/BZ to Kearny St&North Point St SE-NS/BZ	10.3	9.6	-0.7	8.7	10.6	1.9	8.3	8.9	0.6	8.9	8.6	-0.3	10.3	10.9	0.6	11.7	9.9	-1.8	9.5	9.7	0.2
Direction Total	9.5	10.8	1.3	8.6	10.5	1.9	7.2	9.7	2.5	9.1	10.6	1.4	12.1	12.5	0.4	13.5	14.0	0.5	8.9	11.2	2.3

Route Total	9.8	10.9	1.1	8.9	10.6	1.7	7.5	10.0	2.4	9.0	10.6	1.6	11.9	12.6	0.7	13.7	14.2	0.4	9.3	11.5	2.2

Speeds in miles per hour (MPH).

SFMTA Municipal Transportation Agency

Running Time Analysis

SF MTA

Weekday

15 THIRD STREET -MOTORCOACH ARTICULATED

To City College	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
Timepoint Segments	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
[illegible]	5.0	7.2	2.2	6.8	7.5	0.7	7.9	7.7	-0.2	7.5	8.3	0.8	6.5	6.9	0.5	4.8	6.5	1.7	6.4	7.4	1.0
[illegible]	3.8	4.3	0.5	4.2	5.0	0.8	5.0	5.1	0.1	6.0	5.6	-0.4	4.5	4.9	0.4	3.1	3.9	0.8	4.4	4.9	0.4
[illegible]							10.0	3.9	-6.2										10.0	3.9	-6.2
[illegible]	6.8	7.1	0.3	8.2	7.5	-0.7	10.0	9.2	-0.8	8.1	8.9	0.7	5.5	6.4	0.9	4.1	5.6	1.5	7.3	7.5	0.2
[illegible]	9.0	8.1	-0.9	9.2	8.4	-0.8	11.6	9.4	-2.2	10.9	9.4	-1.4	7.0	8.2	-0.8	6.2	5.8	-0.4	9.1	8.1	-1.0
[illegible]	6.3	6.7	0.5	7.0	7.7	0.7	7.0	8.1	1.1	8.5	6.8	0.3	4.6	5.5	0.9	4.0	4.9	0.9	6.1	6.8	0.7
[illegible]																4.8	4.3	-0.5	4.8	4.3	-0.5
[illegible]	9.8	9.7	0.0	11.5	10.9	-0.6	12.0	11.8	-0.2	11.0	10.0	-1.0	8.4	7.5	-0.9	7.4	7.4	-0.1	10.4	9.9	-0.5
[illegible]																4.0	4.0	-0.0	4.0	4.0	-0.0
[illegible]	8.4	9.5	1.0	9.0	10.2	1.2	9.0	10.5	1.5	9.0	9.4	0.4	7.9	7.4	-0.5	7.2	8.7	-0.5	8.5	9.2	0.7
[illegible]	7.0	8.4	1.3	8.0	8.5	0.5	8.0	8.9	0.9	7.0	7.9	0.9	6.0	6.6	0.6	6.0	6.1	0.1	7.1	7.9	0.7
[illegible]	6.6	7.0	0.4	5.5	6.5	1.0	5.8	6.7	0.9	5.3	6.0	0.7	4.2	4.7	0.5	3.6	4.3	0.7	5.3	6.0	0.7
[illegible]	8.0	8.0	2.0	6.0	6.8	0.8	6.0	7.2	1.2	6.8	7.1	0.2	5.3	5.7	0.5	4.7	5.3	0.6	5.9	6.8	0.9
Direction Total	68.6	78.0	7.4	75.4	79.0	3.6	92.3	86.5	-3.8	78.1	79.3	1.2	58.7	61.8	2.1	59.9	64.7	4.8	89.3	86.6	-2.7

To Kearny & North Point	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
Timepoint Segments	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
[illegible]	5.7	6.5	0.8	6.0	6.6	0.6	6.7	8.5	1.8	7.0	8.7	1.7	5.1	6.7	1.5	4.7	6.5	1.9	5.9	7.2	1.3
[illegible]							16.0	7.1	-8.9										16.0	7.1	-8.9
[illegible]	5.5	7.0	1.4	6.9	7.2	0.2	7.0	7.7	0.7	7.0	8.1	1.1	6.1	6.5	0.4	5.0	5.3	0.3	6.3	7.1	0.7
[illegible]	7.0	8.7	1.7	7.0	8.3	1.3	7.0	8.8	1.8	7.0	8.5	1.5	6.4	7.4	1.0	6.0	6.8	0.8	6.8	8.2	1.4
[illegible]	9.0	10.7	1.7	10.0	10.8	0.8	10.0	10.6	0.6	8.9	9.8	0.9	7.8	7.5	-0.3	7.4	7.2	-0.2	9.0	9.8	0.8
[illegible]																3.6	4.1	0.6	3.6	4.1	0.6
[illegible]	9.4	9.6	0.1	10.0	11.3	1.3	10.0	11.2	1.2	8.5	9.1	0.6	7.1	7.4	0.3	7.5	7.4	-0.1	9.1	9.8	0.7
[illegible]																4.7	4.8	0.0	4.7	4.8	0.0
[illegible]	7.7	7.6	-0.2	8.0	8.0	0.0	8.0	7.9	-0.1	6.4	7.4	1.0	4.0	6.3	2.3	4.5	5.8	1.3	6.9	7.4	0.5
[illegible]	11.1	9.1	-2.0	13.3	10.4	-2.8	15.0	10.0	-5.0	12.3	10.1	-2.2	6.5	7.1	0.6	6.1	6.0	-0.1	11.2	9.1	-2.1
[illegible]	7.9	6.4	-1.4	8.7	7.0	-1.8	9.0	7.0	-2.0	7.6	5.9	-1.7	4.9	4.6	-0.1	4.7	4.1	-0.6	7.5	6.1	-1.4
[illegible]	3.0	3.9	0.9	3.6	4.6	1.0	4.0	4.9	0.9	4.0	4.3	0.3	3.4	3.2	-0.1	2.4	2.7	0.3	3.4	4.0	0.7
[illegible]	4.0	4.8	0.8	4.8	4.4	-0.3	5.0	5.2	0.2	4.7	5.3	0.7	4.0	4.1	0.1	3.5	4.6	1.1	4.4	4.7	0.4
Direction Total	70.4	74.2	3.7	78.2	76.6	0.4	97.7	88.9	-8.8	73.3	77.1	3.7	55.3	60.9	5.7	60.1	65.4	5.3	94.8	89.4	-5.4

Times are in decimal minutes.

Running Time Analysis (excluding dwell)

Weekday

SF MTA
15 THIRD STREET -MOTORCOACH ARTICULATED

To City College

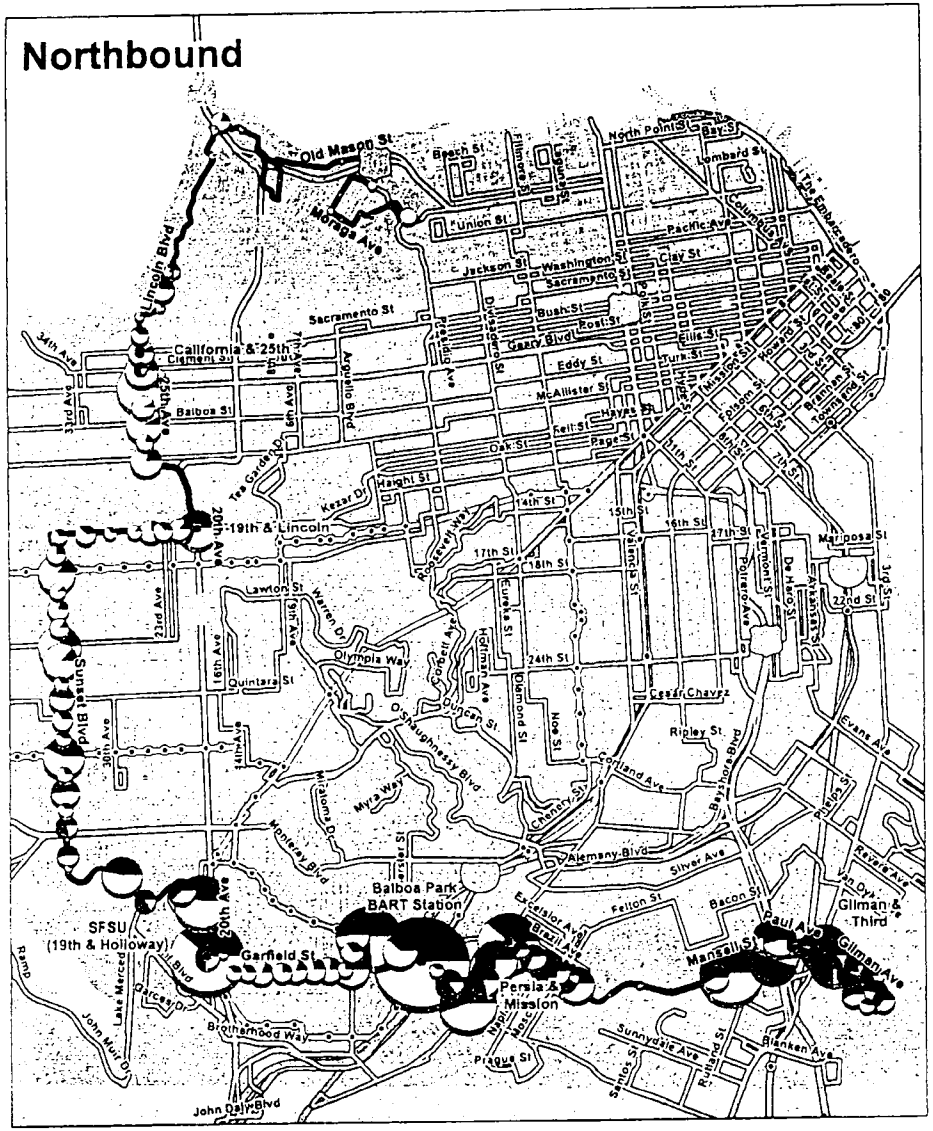
Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Kearny St&North Point St SE-NS/BZ to Columbus Ave&Union St NW-NS/BZ	5.0	6.0	1.0	6.8	6.1	-0.7	7.9	5.9	-2.0	7.5	6.7	-0.8	6.5	6.1	-0.4	4.8	5.8	1.0	6.4	6.1	-0.3
Columbus Ave&Union St NW-NS/BZ to Columbus Ave&Jackson St SW-FS/BZ	3.8	3.6	-0.2	4.2	3.9	-0.3	5.0	3.9	-1.1	6.0	4.7	-1.3	4.5	4.3	-0.1	3.1	3.4	0.3	4.4	4.0	-0.4
Columbus Ave&Jackson St SW-FS/BZ to Sansome St&Sutter St NW-NS/BB							10.0	3.8	-6.2										10.0	3.8	-6.2
Columbus Ave&Jackson St SW-FS/BZ to 2nd St&Stevenson St W-FS/BZ	6.8	4.8	-1.9	8.2	5.5	-2.7	10.0	6.0	-4.0	8.1	5.8	-2.3	5.5	5.1	-0.4	4.1	4.4	0.3	7.3	5.3	-2.0
2nd St&Stevenson St W-FS/BZ to 4th St&Townsend St W-NS	9.0	6.7	-2.3	9.2	7.0	-2.2	11.6	7.8	-3.8	10.9	7.7	-3.1	7.0	5.6	-1.4	6.2	5.3	-0.9	9.1	6.8	-2.3
4th St&Townsend St W-NS to 3rd St&20th St NW-NS/BZ	6.3	6.3	0.0	7.0	6.7	-0.3	7.0	6.8	-0.2	6.5	6.1	-0.4	4.6	5.2	0.6	4.0	4.7	0.7	6.1	6.1	-0.0
3rd St&20th St NW-NS/BZ to US Post Office N-NS																4.8	4.1	-0.6	4.8	4.1	-0.6
3rd St&20th St NW-NS/BZ to 3rd St&Palou Ave NW-NS/BZ	9.6	8.1	-1.6	11.5	9.0	-2.5	12.0	9.3	-2.7	11.0	8.3	-2.7	8.4	6.6	-1.8	7.4	6.5	-0.9	10.4	8.3	-2.1
US Post Office N-NS to 3rd St&Palou Ave NW-NS/BZ																4.0	3.6	-0.4	4.0	3.6	-0.4
3rd St&Palou Ave NW-NS/BZ to Bay Shore Blvd&Arleta Ave W-FS	8.4	7.8	-0.6	9.0	8.4	-0.6	9.0	8.6	-0.4	9.0	8.0	-1.0	7.9	6.5	-1.4	7.2	6.0	-1.2	8.5	7.7	-0.8
Bay Shore Blvd&Arleta Ave W-FS to Geneva Ave&Santos St N-FS/BZ	7.0	6.8	-0.2	8.0	7.0	-1.0	8.0	7.3	-0.7	7.0	6.9	-0.1	6.0	6.1	0.1	6.0	5.6	-0.4	7.1	6.7	-0.4
Geneva Ave&Santos St N-FS/BZ to Geneva Ave&Mission St E-NS	6.6	5.3	-1.3	5.5	5.1	-0.4	5.8	5.4	-0.4	5.3	5.1	-0.2	4.2	4.3	0.1	3.6	3.8	0.2	5.3	4.9	-0.4
Geneva Ave&Mission St E-NS to Phelan Loop N-MB/FL	6.0	7.1	1.1	6.0	6.2	0.2	6.0	6.5	0.5	6.8	6.4	-0.4	5.3	5.4	0.1	4.7	5.1	0.4	5.9	6.2	0.3
Direction Total	68.6	62.6	-6.0	75.4	64.8	-10.6	92.3	71.3	-21.0	78.1	65.7	-12.4	59.7	55.0	-4.7	59.9	58.4	-1.5	89.3	73.6	-15.7

To Kearny & North Point

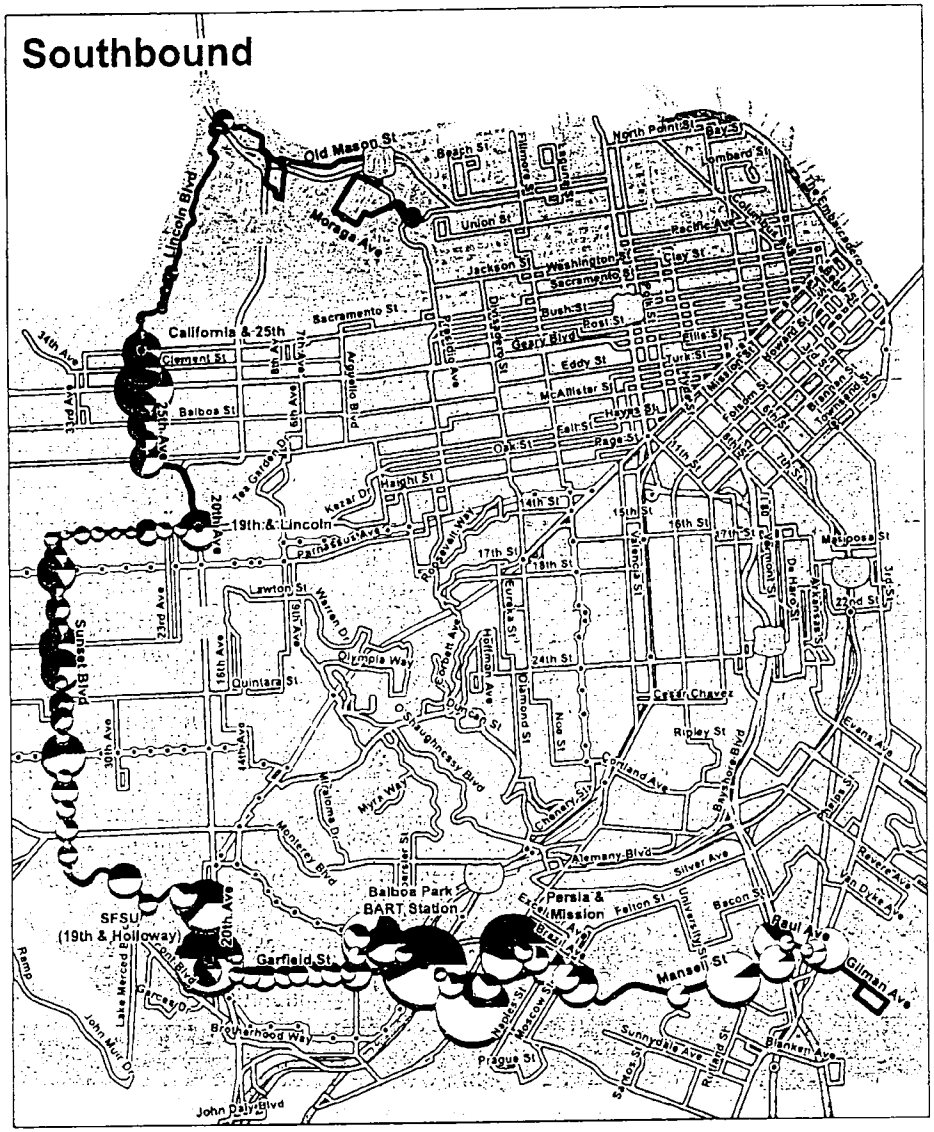
Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Phelan Loop N-MB/FL to Geneva Ave&Mission St W-NS/BZ	5.7	5.5	-0.2	6.0	5.2	-0.8	6.7	6.5	-0.2	7.0	6.7	-0.3	5.1	5.3	0.2	4.7	5.6	1.0	5.9	5.7	-0.2
Cayuga Ave&Onondaga Ave to Geneva Ave&Mission St W-NS/BZ							16.0	6.3	-9.8										16.0	6.3	-9.8
Geneva Ave&Mission St W-NS/BZ to Santos St&Geneva Ave E-FS/BZ	5.5	6.3	0.8	6.9	6.3	-0.6	7.0	6.6	-0.4	7.0	6.7	-0.3	6.1	5.7	-0.4	5.0	4.8	-0.2	6.3	6.2	-0.1
Santos St&Geneva Ave E-FS/BZ to Arleta Ave&Bay Shore Blvd W-NS	7.0	7.0	0.0	7.0	6.7	-0.3	7.0	7.0	-0.0	7.0	6.8	-0.2	6.4	6.4	0.1	6.0	6.0	-0.0	6.8	6.7	-0.1
Arleta Ave&Bay Shore Blvd W-NS to 3rd St&Palou Ave SE-NS/BZ	9.0	8.5	-0.5	10.0	8.5	-1.5	10.0	8.3	-1.7	8.9	7.9	-1.0	7.8	6.6	-1.2	7.4	6.3	-1.1	9.0	7.9	-1.1
3rd St&Palou Ave SE-NS/BZ to US Post Office E-FS																3.6	3.6	0.0	3.6	3.6	0.0
3rd St&Palou Ave SE-NS/BZ to 3rd St&20th St NE-FS/BZ	9.4	8.2	-1.2	10.0	9.0	-1.0	10.0	8.9	-1.1	8.5	7.5	-0.9	7.1	6.6	-0.5	7.5	6.6	-0.9	9.1	8.1	-1.0
US Post Office E-FS to 3rd St&20th St NE-FS/BZ																4.7	4.3	-0.4	4.7	4.3	-0.4
3rd St&20th St NE-FS/BZ to 4th St & Townsend St E-MB/BZ	7.7	6.8	-0.9	8.0	7.4	-0.6	8.0	7.3	-0.7	6.4	6.7	0.4	4.0	6.1	2.1	4.5	5.6	1.0	6.9	6.8	-0.1
4th St & Townsend St E-MB/BZ to Kearny St&Geary Blvd NE-FS/BZ	11.1	7.3	-3.8	13.3	8.4	-4.9	15.0	8.1	-6.9	12.3	8.2	-4.1	6.5	6.1	-0.4	6.1	5.1	-1.0	11.2	7.5	-3.8
Kearny St&Geary Blvd NE-FS/BZ to Columbus Ave&Kearny St N-FS/BZ	7.9	5.1	-2.7	8.7	5.3	-3.4	9.0	5.3	-3.7	7.6	4.7	-2.9	4.9	4.1	-0.8	4.7	3.5	-1.3	7.5	4.8	-2.7
Columbus Ave&Kearny St N-FS/BZ to Columbus Ave&Union St NE-FS/BZ	3.0	3.1	0.1	3.6	3.4	-0.2	4.0	3.5	-0.5	4.0	3.4	-0.6	3.4	2.7	-0.6	2.4	2.4	-0.0	3.4	3.1	-0.3
Columbus Ave&Union St NE-FS/BZ to Kearny St&North Point St SE-NS/BZ	4.0	4.3	0.3	4.8	3.9	-0.8	5.0	4.7	-0.3	4.7	4.8	0.2	4.0	3.8	-0.2	3.5	4.2	0.6	4.4	4.3	-0.1
Direction Total	70.4	62.2	-8.3	78.2	64.1	-14.1	97.7	72.4	-25.4	73.3	63.5	-9.8	55.3	53.5	-1.8	60.1	57.9	-2.2	94.8	75.3	-19.5

Times are in decimal minutes.

Northbound



Southbound



Line 29 - Sunset

Passenger Activity

Ons / Offs

1,000

500

250

Legend

- Featured Line
- Existing Bus Network
- Freeway/Highway
- Muni Metro
- Cable Car
- Historic Streetcar
- BART
- CALTRAIN

MTA Municipal Transportation Agency

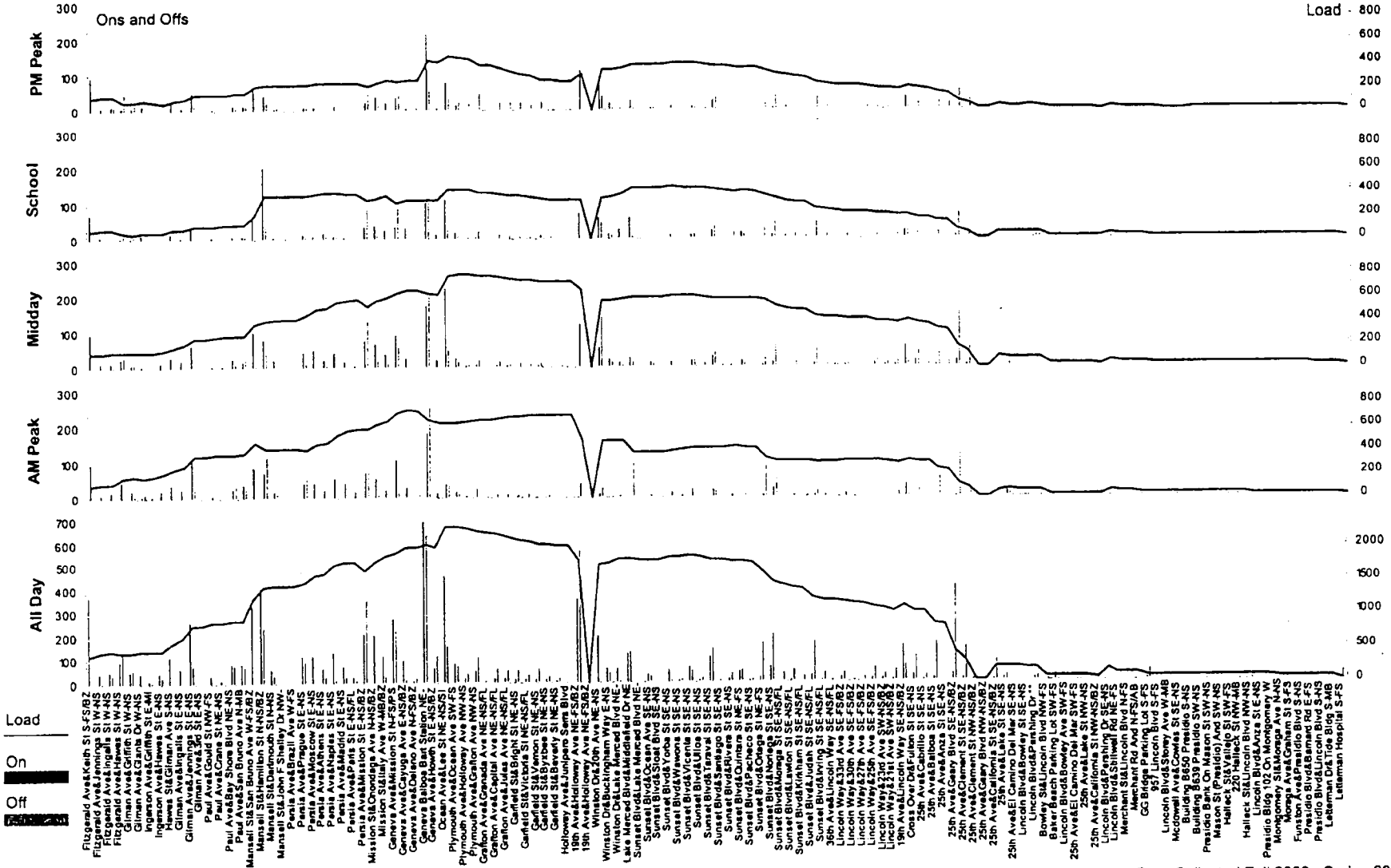
0 0.5 1 2 Miles

TMD

Passenger Activity Graph

SF Muni
29 SUNSET -MOTORCOACH STANDARD

Weekday
To the Presidio

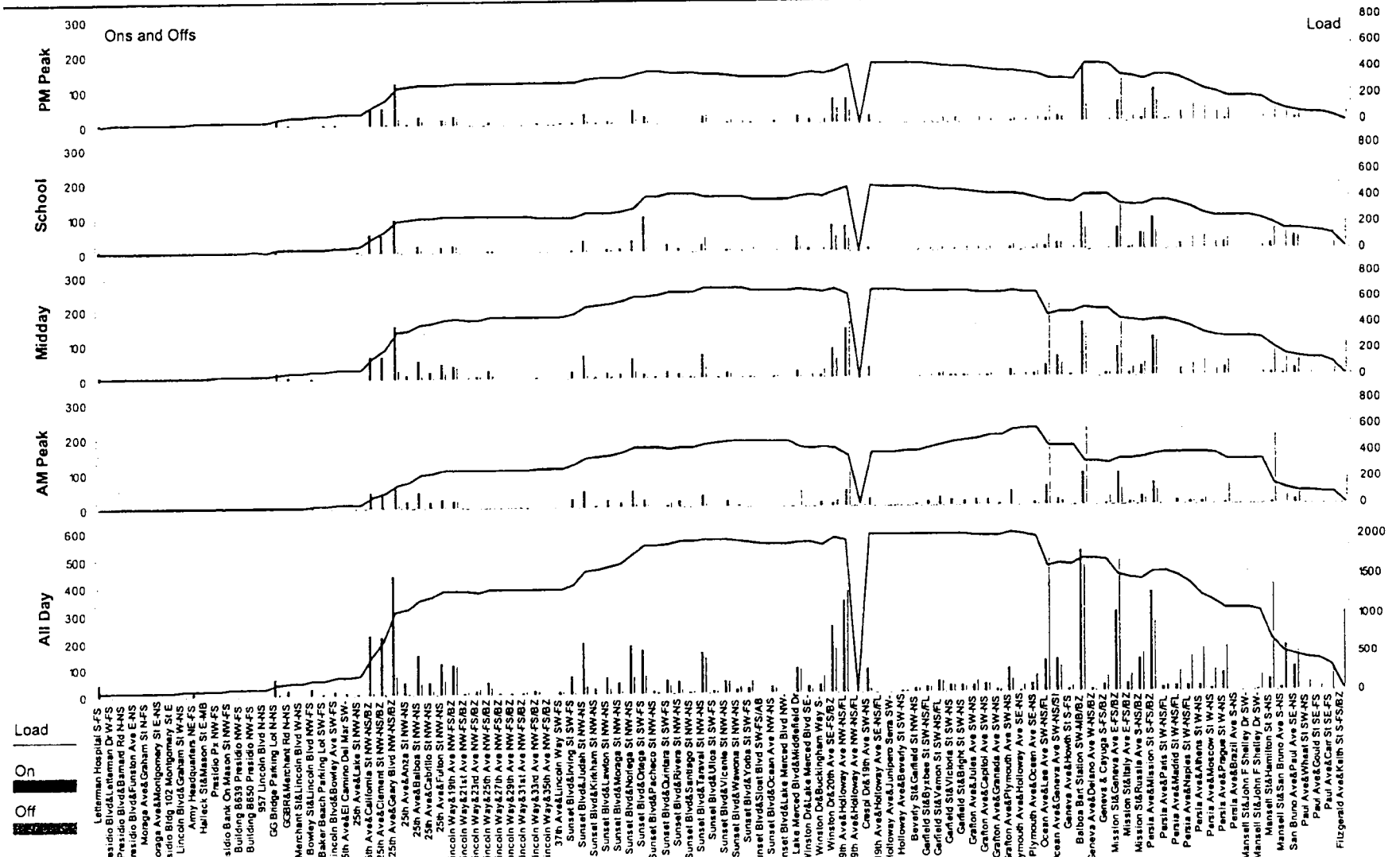


Data Collected Fall 2006 - Spring 2007

Passenger Activity Graph

SF Muni
29 SUNSET -MOTORCOACH STANDARD

Weekday
To Candlestick



Data Collected Fall 2006 - Spring 2007

MTA | Municipal Transportation Agency

Performance Indicators

SF MTA

Weekday

29 SUNSET

Passenger Boardings

Segment	AM Peak	Midday	PM Peak	Evening	OWL	Total
Candlestick - Paul/Third	408	387	354	53	5	1,207
Paul/Third – Mission/Russia	656	881	674	113	4	2,328
Mission/Russia – Balboa Park BART	515	757	579	226	13	2,090
Balboa Park BART – SFSU	702	1,110	678	273	5	2,768
SFSU – 19th/Lincoln	637	1,457	1,099	257	4	3,454
19th/Lincoln – 25th/California	317	682	474	99	4	1,576
25th/California - Presidio	54	161	144	14		373
Total All Segments	**3,289**	**5,435**	**4,002**	**1,035**	**35**	**13,796**

Seat Utilization (Pass Miles/Seat Miles)

AM Peak	Midday	PM Peak	Evening	OWL	Total
27.9%	16.9%	19.9%	4.0%	3.6%	17.1%
53.1%	37.7%	45.5%	10.4%	4.8%	36.7%
76.1%	60.8%	64.8%	23.9%	10.5%	56.8%
78.4%	74.0%	77.4%	26.5%	7.9%	65.4%
58.6%	63.8%	72.6%	21.9%	5.2%	55.2%
37.3%	38.8%	43.8%	12.7%	3.2%	33.8%
6.8%	7.9%	9.6%	3.4%	0.0%	7.6%
49.9%	**46.5%**	**53.1%**	**17.5%**	**5.2%**	**42.8%**

Wheelchair Activity

Segment	AM Peak	Midday	PM Peak	Evening	OWL	Total
Candlestick - Paul/Third		0.4	0.2			0.6
Paul/Third – Mission/Russia			0.1			0.1
Mission/Russia – Balboa Park BART		0.2		0.1		0.4
Balboa Park BART – SFSU		0.7	0.2	0.1		1.0
SFSU – 19th/Lincoln	0.2	1.4	0.1	0.2		1.9
19th/Lincoln – 25th/California	0.1	0.2		0.2		0.5
25th/California - Presidio		0.2				0.2
Total All Segments	**0.3**	**3.2**	**0.6**	**0.6**		**4.6**

Bicycle Activity

AM Peak	Midday	PM Peak	Evening	OWL	Total
0.1	0.4	0.2			0.6
0.1	0.7	0.6	0.3		1.7
0.1	0.3	0.3	0.2		0.9
0.4	1.0	0.2	0.5		2.1
0.4	1.3	1.0	0.9		3.6
0.1	0.4		0.3		0.8
	0.7	0.2	0.1		1.0
1.0	**4.7**	**2.3**	**2.4**		**10.5**

Passengers Per Revenue Hour

Segment	AM Peak	Midday	PM Peak	Evening	OWL	Total
Candlestick - Paul/Third	177.4	99.7	147.7	28.1	20.2	112.7
Paul/Third – Mission/Russia	87.2	67.2	75.0	19.5	6.8	64.7
Mission/Russia – Balboa Park BART	145.6	122.9	129.7	77.6	44.4	120.4
Balboa Park BART – SFSU	81.1	81.5	76.0	46.6	8.6	73.6
SFSU – 19th/Lincoln	47.2	62.0	77.3	24.7	3.7	55.1
19th/Lincoln – 25th/California	77.9	88.1	98.6	33.4	12.8	79.2
25th/California - Presidio	10.2	15.8	24.7	8.0		16.1
Total All Segments	**73.3**	**69.5**	**80.7**	**32.8**	**10.7**	**66.5**

Passenger Miles Per Revenue Hour

AM Peak	Midday	PM Peak	Evening	OWL	Total
117.1	66.6	75.5	18.0	16.5	69.7
242.8	166.8	192.6	58.0	26.3	169.4
278.2	215.3	214.1	99.6	43.5	205.5
262.2	248.5	252.6	113.0	33.5	228.2
301.5	314.9	351.2	133.0	31.1	285.2
181.3	171.4	186.6	78.8	20.1	161.0
42.2	46.9	54.5	20.9	-	45.4
231.4	**209.3**	**228.3**	**94.3**	**27.8**	**198.2**

Operating Ratio (Op Rev/Op Cost)

Segment	AM Peak	Midday	PM Peak	Evening	OWL	Total
Candlestick - Paul/Third	108.7%	62.4%	93.8%	16.8%	12.0%	69.7%
Paul/Third – Mission/Russia	51.7%	40.3%	45.8%	10.7%	3.8%	38.2%
Mission/Russia – Balboa Park BART	93.6%	79.9%	86.2%	47.7%	27.4%	77.7%
Balboa Park BART – SFSU	53.7%	53.9%	50.7%	28.4%	5.2%	48.0%
SFSU – 19th/Lincoln	26.7%	35.7%	44.9%	13.0%	2.0%	31.2%
19th/Lincoln – 25th/California	45.1%	53.0%	60.1%	17.5%	6.7%	46.3%
25th/California - Presidio	5.3%	8.4%	13.4%	4.2%		8.5%
Total All Segments	**43.3%**	**41.5%**	**49.0%**	**18.2%**	**6.0%**	**39.3%**

Operating Cost Per Revenue Hour

AM Peak	Midday	PM Peak	Evening	OWL	Total
$ 86.50	$ 84.62	$ 83.45	$ 88.88	$ 89.38	$ 85.62
$ 89.30	$ 88.23	$ 86.75	$ 96.82	$ 96.28	$ 89.59
$ 82.42	$ 81.58	$ 79.76	$ 86.22	$ 86.06	$ 82.14
$ 80.10	$ 80.20	$ 79.48	$ 86.97	$ 86.87	$ 81.16
$ 93.61	$ 92.00	$ 91.30	$ 100.55	$ 99.67	$ 93.74
$ 91.44	$ 88.13	$ 86.95	$ 101.50	$ 101.57	$ 90.72
$ 101.57	$ 99.65	$ 97.77	$ 100.97	$ 100.85	$ 99.72
$ 89.77	**$ 88.74**	**$ 87.27**	**$ 95.44**	**$ 95.05**	**$ 89.73**

Subsidy Per Passenger Boarding

Segment	AM Peak	Midday	PM Peak	Evening	OWL	Total
Candlestick - Paul/Third	$ 0.04	$ (0.32)	$ (0.03)	$ (2.63)	$ (3.90)	$ (0.23)
Paul/Third – Mission/Russia	$ (0.49)	$ (0.78)	$ (0.63)	$ (4.43)	$ (13.54)	$ (0.86)
Mission/Russia – Balboa Park BART	$ (0.04)	$ (0.13)	$ (0.08)	$ (0.58)	$ (1.41)	$ (0.15)
Balboa Park BART – SFSU	$ (0.46)	$ (0.45)	$ (0.52)	$ (1.34)	$ (9.58)	$ (0.57)
SFSU – 19th/Lincoln	$ (1.45)	$ (0.95)	$ (0.65)	$ (3.55)	$ (26.05)	$ (1.17)
19th/Lincoln – 25th/California	$ (0.64)	$ (0.47)	$ (0.35)	$ (2.50)	$ (7.39)	$ (0.82)
25th/California - Presidio	$ (9.40)	$ (5.76)	$ (3.42)	$ (12.12)		$ (5.62)
Total All Segments	**$ (0.69)**	**$ (0.75)**	**$ (0.55)**	**$ (2.38)**	**$ (7.82)**	**$ (0.82)**

Subsidy Per Passenger Mile

AM Peak	Midday	PM Peak	Evening	OWL	Total
$ 0.06	$ (0.48)	$ (0.07)	$ (4.11)	$ (4.78)	$ (0.37)
$ (0.18)	$ (0.32)	$ (0.24)	$ (1.49)	$ (3.52)	$ (0.33)
$ (0.02)	$ (0.08)	$ (0.05)	$ (0.45)	$ (1.44)	$ (0.09)
$ (0.14)	$ (0.15)	$ (0.16)	$ (0.55)	$ (2.46)	$ (0.18)
$ (0.23)	$ (0.19)	$ (0.14)	$ (0.66)	$ (3.14)	$ (0.23)
$ (0.28)	$ (0.24)	$ (0.19)	$ (1.06)	$ (4.72)	$ (0.30)
$ (2.28)	$ (1.95)	$ (1.55)	$ (4.64)		$ (1.99)
$ (0.22)	**$ (0.25)**	**$ (0.19)**	**$ (0.83)**	**$ (3.00)**	**$ (0.27)**

SF MTA
29 SUNSET -MOTORCOACH STANDARD

To Candlestick

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Letterman Hospital S-FS to GGBR&Merchant Rd N-NS	10.0	12.6	2.6	10.5	12.1	1.6	11.3	10.5	-0.7	11.3	11.5	0.2	10.0	9.5	-0.5				10.7	11.8	1.1
GGBR&Merchant Rd N-NS to 25th Ave&California St NW-NS/BZ	6.0	6.3	0.3	6.0	6.4	0.4	6.0	6.9	0.9	6.0	6.9	0.9	6.0	7.2	1.2				6.0	6.6	0.6
25th Ave&California St NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ	7.5	7.7	0.2	8.1	7.7	-0.5	9.0	9.1	0.1	8.4	9.7	1.3	6.0	9.3	3.3				8.1	8.3	0.2
25th Ave&Geary Blvd NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ													4.0	4.6	0.6	4.0	4.2	0.2	4.0	4.4	0.4
Lincoln Way&19th Ave NW-FS/BZ to Sunset Blvd&Noriega St NW-NS	7.5	7.7	0.3	7.0	7.8	0.8	7.9	8.3	0.4	7.5	7.8	0.3	6.0	5.7	-0.3	6.0	5.0	-1.0	7.1	7.3	0.3
Sunset Blvd&Noriega St NW-NS to 19th Ave&Holloway Ave NW-NS/FL	12.5	14.2	1.6	13.6	14.6	0.9	15.6	17.2	1.6	12.8	15.2	2.4	10.7	11.2	0.6	11.0	9.7	-1.3	12.9	14.0	1.1
19th Ave&Holloway Ave NW-NS/FL to 19th Ave&Holloway Ave NW-NS/FL	3.0	1.0	-2.0																3.0	1.0	-2.0
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	13.6	14.8	1.2	13.0	13.8	0.8	13.9	15.4	1.5	13.2	14.2	1.0	10.2	12.5	2.2	10.0	11.4	1.4	12.6	13.8	1.2
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	10.0	10.4	0.4																10.0	10.4	0.4
Balboa Bart Station SW-MB/BZ to Mission St&Geneva Ave E-FS/BZ	3.8	3.7	-0.1	4.0	3.5	-0.5	5.1	4.4	-0.7	3.8	4.4	0.6	3.0	2.9	-0.1	3.0	2.5	-0.5	3.9	3.6	-0.2
Mission St&Geneva Ave E-FS/BZ to Mansell St&San Bruno Ave S-NS	10.8	11.1	0.3	10.7	11.5	0.8	12.2	13.5	1.3	11.4	12.1	0.7	9.1	10.3	1.2	9.0	9.5	0.5	10.7	11.4	0.7
Mansell St&San Bruno Ave S-NS to Fitzgerald Ave&Keith St S-FS/BZ	3.9	4.8	1.0	4.0	4.4	0.4	4.0	4.8	0.8	3.7	4.2	0.5	2.1	3.9	1.8	2.0	4.3	2.3	3.5	4.4	0.9
Direction Total	88.5	94.2	5.7	77.0	81.6	4.7	84.9	90.1	5.2	78.0	86.0	8.0	67.1	77.1	10.0	45.0	46.6	1.6	92.5	97.2	4.7

To the Presidio

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Fitzgerald Ave&Keith St S-FS/BZ to Mansell St&San Bruno Ave W-FS/BZ	9.9	11.6	1.8	10.3	11.1	0.8	11.0	12.2	1.2	10.8	11.3	0.5	9.2	11.0	1.7	9.0	9.8	0.8	10.1	11.3	1.2
Mansell St&San Bruno Ave W-FS/BZ to Geneva Ave&Mission St N-FS/PS	11.4	13.0	1.6	11.7	12.7	1.0	14.1	14.5	0.4	11.0	12.1	1.1	10.2	11.1	0.9	10.1	11.4	1.3	11.6	12.7	1.1
Geneva Ave&Mission St N-FS/PS to Geneva Balboa Bart Station NE-MB/BZ	3.0	4.3	1.3	3.0	3.6	0.6	3.0	4.2	1.2	3.0	4.3	1.3	3.0	2.9	-0.1	3.0	2.6	-0.5	3.0	3.8	0.8
Geneva Balboa Bart Station NE-MB/BZ to 19th Ave&Holloway Ave NE-FS/BZ	12.6	12.4	-0.2	12.2	13.4	1.2	13.0	13.6	0.6	12.8	13.5	0.7	10.0	11.1	1.1	10.4	9.4	-1.0	12.0	12.7	0.7
19th Ave&Holloway Ave NE-FS/BZ to 19th Ave&Holloway Ave NE-FS/BZ													2.0	0.7	-1.3	2.2	0.7	-1.5	2.1	0.7	-1.4
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS	13.9	12.4	-1.6	13.8	13.6	-0.3	14.0	15.1	1.1	13.7	13.5	-0.1				12.5	9.9	-2.6	13.8	13.4	-0.4
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS													11.0	10.7	-0.3	10.8	9.5	-1.3	10.9	10.1	-0.8
Sunset Blvd&Noriega St SE-NS to 19th Ave&Lincoln Way SE-NS/BZ	8.5	10.3	1.8	8.8	10.5	1.7	10.0	10.5	0.5	9.8	10.6	0.9	6.0	8.4	2.4	6.4	7.4	0.9	8.4	9.9	1.6
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&California St NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&Geary Blvd NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to Merchant Rd And N-FS/AB	12.0	12.6	0.6	12.2	13.6	1.4	13.0	13.7	0.7	14.0	14.0	0.0				12.0	11.6	-0.4	12.6	13.3	0.7
Merchant Rd And N-FS/AB to Letterman Hospital S-FS	9.9	12.3	2.4	10.3	13.9	3.6	10.8	11.8	1.0	10.0	12.4	2.4				9.0	13.4	4.4	10.2	12.8	2.6
Direction Total	81.3	89.0	7.7	82.3	92.5	10.1	88.9	95.7	6.8	85.1	91.8	6.7	51.4	55.9	4.4	85.4	85.5	0.1	94.7	100.7	6.0

Times are in decimal minutes.

Running Time Analysis (excluding dwell)

Weekday

SF MTA
29 SUNSET -MOTORCOACH STANDARD

To Candlestick

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Letterman Hospital S-FS to GGBR&Merchant Rd N-NS	10.0	11.1	1.1	10.5	11.1	0.6	11.3	9.5	-1.8	11.3	10.6	-0.7	10.0	8.2	-1.8				10.7	10.6	-0.0
GGBR&Merchant Rd N-NS to 25th Ave&California St NW-NS/BZ	6.0	5.7	-0.3	6.0	5.8	-0.2	6.0	5.9	-0.1	6.0	6.0	-0.0	6.0	5.2	-0.8				6.0	5.8	-0.2
25th Ave&California St NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ	7.5	6.3	-1.1	8.1	5.9	-2.2	9.0	6.9	-2.1	8.4	7.9	-0.6	6.0	5.5	-0.5				8.1	6.5	-1.6
25th Ave&Geary Blvd NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ													4.0	4.3	0.3	4.0	4.0	0.0	4.0	4.2	0.2
Lincoln Way&19th Ave NW-FS/BZ to Sunset Blvd&Noriega St NW-NS	7.5	6.6	-0.9	7.0	6.6	-0.4	7.9	6.8	-1.1	7.5	6.5	-1.0	6.0	5.3	-0.7	6.0	4.8	-1.2	7.1	6.3	-0.8
Sunset Blvd&Noriega St NW-NS to 19th Ave&Holloway Ave NW-NS/FL	12.5	12.0	-0.6	13.6	12.0	-1.7	15.6	13.1	-2.5	12.8	12.5	-0.2	10.7	10.0	-0.7	11.0	9.3	-1.7	12.9	11.7	-1.2
19th Ave&Holloway Ave NW-NS/FL to 19th Ave&Holloway Ave NW-NS/FL	3.0	1.0	-2.0																3.0	1.0	-2.0
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	13.6	11.5	-2.1	13.0	11.1	-1.9	13.9	11.7	-2.2	13.2	11.5	-1.7	10.2	10.9	0.7	10.0	10.5	0.5	12.6	11.2	-1.4
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	10.0	9.2	-0.8																10.0	9.2	-0.8
Balboa Bart Station SW-MB/BZ to Mission St&Geneva Ave E-FS/BZ	3.8	3.2	-0.6	4.0	3.0	-1.0	5.1	3.5	-1.6	3.8	3.6	-0.1	3.0	2.6	-0.4	3.0	2.3	-0.7	3.9	3.1	-0.8
Mission St&Geneva Ave E-FS/BZ to Mansell St&San Bruno Ave S-NS	10.8	9.3	-1.5	10.7	9.4	-1.3	12.2	10.6	-1.6	11.4	9.9	-1.5	9.1	8.9	-0.2	9.0	8.7	-0.3	10.7	9.5	-1.2
Mansell St&San Bruno Ave S-NS to Fitzgerald Ave&Keith St S-FS/BZ	3.9	4.3	0.4	4.0	4.0	0.0	4.0	4.2	0.2	3.7	3.8	0.1	2.1	3.7	1.6	2.0	4.0	2.0	3.5	4.0	0.5
Direction Total	88.5	80.2	-8.3	77.0	68.8	-8.2	84.9	72.2	-12.7	78.0	72.2	-5.8	67.1	64.6	-2.6	45.0	43.6	-1.4	92.5	83.2	-9.3

To the Presidio

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Fitzgerald Ave&Keith St S-FS/BZ to Mansell St&San Bruno Ave W-FS/BZ	9.9	9.4	-0.4	10.3	9.2	-1.0	11.0	10.0	-1.0	10.8	9.1	-1.7	9.2	9.5	0.3	9.0	7.3	-1.7	10.1	9.2	-0.9
Mansell St&San Bruno Ave W-FS/BZ to Geneva Ave&Mission St N-FS/PS	11.4	10.2	-1.2	11.7	10.2	-1.5	14.1	11.3	-2.8	11.0	10.3	-0.7	10.2	10.1	-0.2	10.1	10.2	0.1	11.6	10.4	-1.2
Geneva Ave&Mission St N-FS/PS to Geneva Balboa Bart Station NE-MB/BZ	3.0	3.3	0.3	3.0	2.7	-0.3	3.0	3.4	0.4	3.0	3.4	0.4	3.0	2.4	-0.6	3.0	2.1	-0.9	3.0	3.0	-0.0
Geneva Balboa Bart Station NE-MB/BZ to 19th Ave&Holloway Ave NE-FS/BZ	12.6	10.7	-1.9	12.2	10.9	-1.3	13.0	11.4	-1.6	12.8	11.1	-1.7	10.0	10.0	-0.0	10.4	8.8	-1.6	12.0	10.7	-1.3
19th Ave&Holloway Ave NE-FS/BZ to 19th Ave&Holloway Ave NE-FS/BZ													2.0	0.3	-1.7	2.2	0.3	-1.9	2.1	0.3	-1.8
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS	13.9	10.7	-3.3	13.8	11.3	-2.6	14.0	12.4	-1.6	13.7	11.7	-2.0				12.5	9.0	-3.5	13.8	11.3	-2.5
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS													11.0	9.7	-1.3	10.8	9.2	-1.6	10.9	9.4	-1.5
Sunset Blvd&Noriega St SE-NS to 19th Ave&Lincoln Way SE-NS/BZ	8.5	9.3	0.8	8.8	9.2	0.4	10.0	9.4	-0.6	9.8	9.6	-0.2	6.0	7.7	1.7	6.4	6.8	0.4	8.4	8.9	0.5
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&California St NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&Geary Blvd NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to Merchant Rd And N-FS/AB	12.0	11.3	-0.7	12.2	11.8	-0.4	13.0	12.2	-0.8	14.0	12.3	-1.7				12.0	10.4	-1.6	12.6	11.7	-0.8
Merchant Rd And N-FS/AB to Letterman Hospital S-FS	9.9	11.6	1.7	10.3	13.2	2.9	10.8	11.1	0.3	10.0	11.3	1.3				9.0	13.0	4.0	10.2	12.1	1.9
Direction Total	81.3	76.6	-4.7	82.3	78.5	-3.8	88.9	81.2	-7.7	85.1	78.8	-6.3	51.4	49.6	-1.9	85.4	77.3	-8.2	94.7	87.0	-7.6

Times are in decimal minutes.

SF MTA

29 SUNSET -MOTORCOACH STANDARD

To Candlestick

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Letterman Hospital S-FS to GGBR&Merchant Rd N-NS	10.0	12.6	2.6	10.5	12.1	1.6	11.3	10.5	-0.7	11.3	11.5	0.2	10.0	9.5	-0.5				10.7	11.8	1.1
GGBR&Merchant Rd N-NS to 25th Ave&California St NW-NS/BZ	6.0	6.3	0.3	6.0	6.4	0.4	6.0	6.9	0.9	6.0	6.9	0.9	6.0	7.2	1.2				6.0	6.6	0.6
25th Ave&California St NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ	7.5	7.7	0.2	8.1	7.7	-0.5	9.0	9.1	0.1	8.4	9.7	1.3	6.0	9.3	3.3				8.1	8.3	0.2
25th Ave&Geary Blvd NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ													4.0	4.6	0.6	4.0	4.2	0.2	4.0	4.4	0.4
Lincoln Way&19th Ave NW-FS/BZ to Sunset Blvd&Noriega St NW-NS	7.5	7.7	0.3	7.0	7.8	0.8	7.9	8.3	0.4	7.5	7.8	0.3	6.0	5.7	-0.3	6.0	5.0	-1.0	7.1	7.3	0.3
Sunset Blvd&Noriega St NW-NS to 19th Ave&Holloway Ave NW-NS/FL	12.5	14.2	1.6	13.6	14.6	0.9	15.6	17.2	1.6	12.8	15.2	2.4	10.7	11.2	0.6	11.0	9.7	-1.3	12.9	14.0	1.1
19th Ave&Holloway Ave NW-NS/FL to 19th Ave&Holloway Ave NW-NS/FL	3.0	1.0	-2.0																3.0	1.0	-2.0
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	13.6	14.8	1.2	13.0	13.8	0.8	13.9	15.4	1.5	13.2	14.2	1.0	10.2	12.5	2.2	10.0	11.4	1.4	12.6	13.8	1.2
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	10.0	10.4	0.4																10.0	10.4	0.4
Balboa Bart Station SW-MB/BZ to Mission St&Geneva Ave E-FS/BZ	3.8	3.7	-0.1	4.0	3.5	-0.5	5.1	4.4	-0.7	3.8	4.4	0.6	3.0	2.9	-0.1	3.0	2.5	-0.5	3.9	3.6	-0.2
Mission St&Geneva Ave E-FS/BZ to Mansell St&San Bruno Ave S-NS	10.8	11.1	0.3	10.7	11.5	0.8	12.2	13.5	1.3	11.4	12.1	0.7	9.1	10.3	1.2	9.0	9.5	0.5	10.7	11.4	0.7
Mansell St&San Bruno Ave S-NS to Fitzgerald Ave&Keith St S-FS/BZ	3.9	4.8	1.0	4.0	4.4	0.4	4.0	4.8	0.8	3.7	4.2	0.5	2.1	3.9	1.8	2.0	4.3	2.3	3.5	4.4	0.9
Direction Total	88.5	94.2	5.7	77.0	81.6	4.7	84.9	90.1	5.2	78.0	86.0	8.0	67.1	77.1	10.0	45.0	46.6	1.6	92.5	97.2	4.7

To the Presidio

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Fitzgerald Ave&Keith St S-FS/BZ to Mansell St&San Bruno Ave W-FS/BZ	9.9	11.6	1.8	10.3	11.1	0.8	11.0	12.2	1.2	10.8	11.3	0.5	9.2	11.0	1.7	9.0	9.8	0.8	10.1	11.3	1.2
Mansell St&San Bruno Ave W-FS/BZ to Geneva Ave&Mission St N-FS/PS	11.4	13.0	1.6	11.7	12.7	1.0	14.1	14.5	0.4	11.0	12.1	1.1	10.2	11.1	0.9	10.1	11.4	1.3	11.6	12.7	1.1
Geneva Ave&Mission St N-FS/PS to Geneva Balboa Bart Station NE-MB/BZ	3.0	4.3	1.3	3.0	3.6	0.6	3.0	4.2	1.2	3.0	4.3	1.3	3.0	2.9	-0.1	3.0	2.6	-0.5	3.0	3.8	0.8
Geneva Balboa Bart Station NE-MB/BZ to 19th Ave&Holloway Ave NE-FS/BZ	12.6	12.4	-0.2	12.2	13.4	1.2	13.0	13.6	0.6	12.8	13.5	0.7	10.0	11.1	1.1	10.4	9.4	-1.0	12.0	12.7	0.7
19th Ave&Holloway Ave NE-FS/BZ to 19th Ave&Holloway Ave NE-FS/BZ													2.0	0.7	-1.3	2.2	0.7	-1.5	2.1	0.7	-1.4
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS	13.9	12.4	-1.6	13.8	13.6	-0.3	14.0	15.1	1.1	13.7	13.5	-0.1				12.5	9.9	-2.6	13.8	13.4	-0.4
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS													11.0	10.7	-0.3	10.8	9.5	-1.3	10.9	10.1	-0.8
Sunset Blvd&Noriega St SE-NS to 19th Ave&Lincoln Way SE-NS/BZ	8.5	10.3	1.8	8.8	10.5	1.7	10.0	10.5	0.5	9.8	10.6	0.9	6.0	8.4	2.4	6.4	7.4	0.9	8.4	9.9	1.6
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&California St NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&Geary Blvd NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to Merchant Rd And N-FS/AB	12.0	12.6	0.6	12.2	13.6	1.4	13.0	13.7	0.7	14.0	14.0	0.0				12.0	11.6	-0.4	12.6	13.3	0.7
Merchant Rd And N-FS/AB to Letterman Hospital S-FS	9.9	12.3	2.4	10.3	13.9	3.6	10.8	11.8	1.0	10.0	12.4	2.4				9.0	13.4	4.4	10.2	12.8	2.6
Direction Total	81.3	89.0	7.7	82.3	92.5	10.1	88.9	95.7	6.8	85.1	91.8	6.7	51.4	55.9	4.4	85.4	85.5	0.1	94.7	100.7	6.0

Times are in decimal minutes.

Running Time Analysis (excluding dwell)

Weekday

SF MTA
29 SUNSET -MOTORCOACH STANDARD

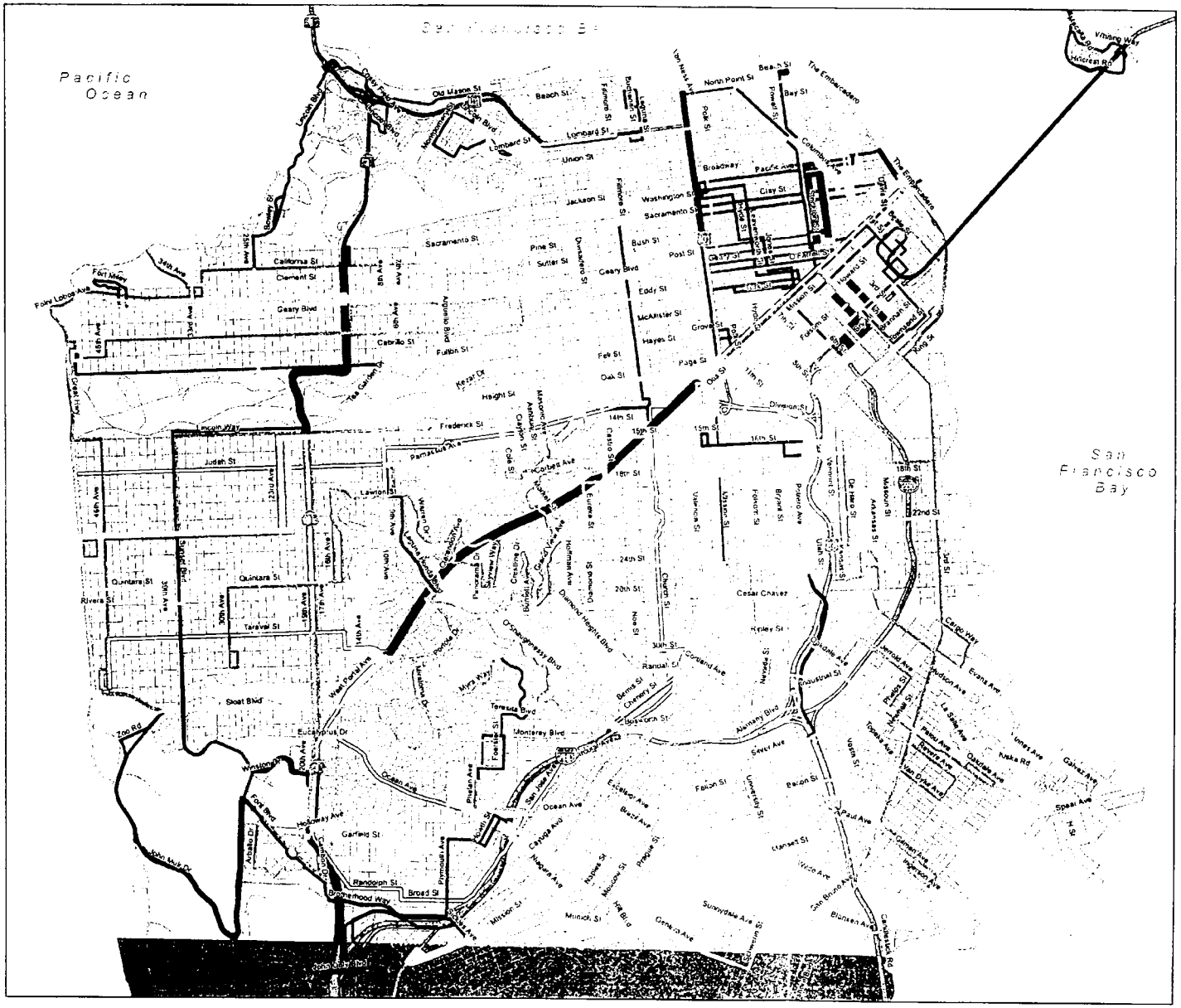
To Candlestick

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Letterman Hospital S-FS to GGBR&Merchant Rd N-NS	10.0	11.1	1.1	10.5	11.1	0.6	11.3	9.5	-1.8	11.3	10.6	-0.7	10.0	8.2	-1.8				10.7	10.6	-0.0
GGBR&Merchant Rd N-NS to 25th Ave&California St NW-NS/BZ	6.0	5.7	-0.3	6.0	5.8	-0.2	6.0	5.9	-0.1	6.0	6.0	-0.0	6.0	5.2	-0.8				6.0	5.8	-0.2
25th Ave&California St NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ	7.5	6.3	-1.1	8.1	5.9	-2.2	9.0	6.9	-2.1	8.4	7.9	-0.6	6.0	5.5	-0.5				8.1	6.5	-1.6
25th Ave&Geary Blvd NW-NS/BZ to Lincoln Way&19th Ave NW-FS/BZ													4.0	4.3	0.3	4.0	4.0	0.0	4.0	4.2	0.2
Lincoln Way&19th Ave NW-FS/BZ to Sunset Blvd&Noriega St NW-NS	7.5	6.6	-0.9	7.0	6.6	-0.4	7.9	6.8	-1.1	7.5	6.5	-1.0	6.0	5.3	-0.7	6.0	4.8	-1.2	7.1	6.3	-0.8
Sunset Blvd&Noriega St NW-NS to 19th Ave&Holloway Ave NW-NS/FL	12.5	12.0	-0.6	13.6	12.0	-1.7	15.6	13.1	-2.5	12.8	12.5	-0.2	10.7	10.0	-0.7	11.0	9.3	-1.7	12.9	11.7	-1.2
19th Ave&Holloway Ave NW-NS/FL to 19th Ave&Holloway Ave NW-NS/FL	3.0	1.0	-2.0																3.0	1.0	-2.0
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	13.6	11.5	-2.1	13.0	11.1	-1.9	13.9	11.7	-2.2	13.2	11.5	-1.7	10.2	10.9	0.7	10.0	10.5	0.5	12.6	11.2	-1.4
19th Ave&Holloway Ave NW-NS/FL to Balboa Bart Station SW-MB/BZ	10.0	9.2	-0.8																10.0	9.2	-0.8
Balboa Bart Station SW-MB/BZ to Mission St&Geneva Ave E-FS/BZ	3.8	3.2	-0.6	4.0	3.0	-1.0	5.1	3.5	-1.6	3.8	3.6	-0.1	3.0	2.6	-0.4	3.0	2.3	-0.7	3.9	3.1	-0.8
Mission St&Geneva Ave E-FS/BZ to Mansell St&San Bruno Ave S-NS	10.8	9.3	-1.5	10.7	9.4	-1.3	12.2	10.6	-1.6	11.4	9.9	-1.5	9.1	8.9	-0.2	9.0	8.7	-0.3	10.7	9.5	-1.2
Mansell St&San Bruno Ave S-NS to Fitzgerald Ave&Keith St S-FS/BZ	3.9	4.3	0.4	4.0	4.0	0.0	4.0	4.2	0.2	3.7	3.8	0.1	2.1	3.7	1.6	2.0	4.0	2.0	3.5	4.0	0.5
Direction Total	88.5	80.2	-8.3	77.0	68.8	-8.2	84.9	72.2	-12.7	78.0	72.2	-5.8	67.1	64.6	-2.6	45.0	43.6	-1.4	92.5	83.2	-9.3

To the Presidio

Timepoint Segments	AM Peak			Midday			School			PM Peak			Evening			Night			Summary		
	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)	Scheduled (MIN)	Actual (MIN)	Difference (MIN)
Fitzgerald Ave&Keith St S-FS/BZ to Mansell St&San Bruno Ave W-FS/BZ	9.9	9.4	-0.4	10.3	9.2	-1.0	11.0	10.0	-1.0	10.8	9.1	-1.7	9.2	9.5	0.3	9.0	7.3	-1.7	10.1	9.2	-0.9
Mansell St&San Bruno Ave W-FS/BZ to Geneva Ave&Mission St N-FS/PS	11.4	10.2	-1.2	11.7	10.2	-1.5	14.1	11.3	-2.8	11.0	10.3	-0.7	10.2	10.1	-0.2	10.1	10.2	0.1	11.6	10.4	-1.2
Geneva Ave&Mission St N-FS/PS to Geneva Balboa Bart Station NE-MB/BZ	3.0	3.3	0.3	3.0	2.7	-0.3	3.0	3.4	0.4	3.0	3.4	0.4	3.0	2.4	-0.6	3.0	2.1	-0.9	3.0	3.0	-0.0
Geneva Balboa Bart Station NE-MB/BZ to 19th Ave&Holloway Ave NE-FS/BZ	12.6	10.7	-1.9	12.2	10.9	-1.3	13.0	11.4	-1.6	12.8	11.1	-1.7	10.0	10.0	-0.0	10.4	8.8	-1.6	12.0	10.7	-1.3
19th Ave&Holloway Ave NE-FS/BZ to 19th Ave&Holloway Ave NE-FS/BZ													2.0	0.3	-1.7	2.2	0.3	-1.9	2.1	0.3	-1.8
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS	13.9	10.7	-3.3	13.8	11.3	-2.6	14.0	12.4	-1.6	13.7	11.7	-2.0				12.5	9.0	-3.5	13.8	11.3	-2.5
19th Ave&Holloway Ave NE-FS/BZ to Sunset Blvd&Noriega St SE-NS													11.0	9.7	-1.3	10.8	9.2	-1.6	10.9	9.4	-1.5
Sunset Blvd&Noriega St SE-NS to 19th Ave&Lincoln Way SE-NS/BZ	8.5	9.3	0.8	8.8	9.2	0.4	10.0	9.4	-0.6	9.8	9.6	-0.2	6.0	7.7	1.7	6.4	6.8	0.4	8.4	8.9	0.5
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&California St NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to 25th Ave&Geary Blvd NW-NS/BZ																					
19th Ave&Lincoln Way SE-NS/BZ to Merchant Rd And N-FS/AB	12.0	11.3	-0.7	12.2	11.8	-0.4	13.0	12.2	-0.8	14.0	12.3	-1.7				12.0	10.4	-1.6	12.6	11.7	-0.8
Merchant Rd And N-FS/AB to Letterman Hospital S-FS	9.9	11.6	1.7	10.3	13.2	2.9	10.8	11.1	0.3	10.0	11.3	1.3				9.0	13.0	4.0	10.2	12.1	1.9
Direction Total	81.3	76.6	-4.7	82.3	78.5	-3.8	88.9	81.2	-7.7	85.1	78.8	-6.3	51.4	49.6	-1.9	85.4	77.3	-8.2	94.7	87.0	-7.6

Times are in decimal minutes.



Actual Operating Speed (With Dwell)

SFMTA Bus and Rail Network

Route Segment Performance

(Miles Per Hour)

- More than 12.5
- 10.0 - 12.5
- 7.5 - 10.0
- 5.0 - 7.5
- Less than 5.0

Not Shown: Non-Loading Express Route Segments And Non-Operating Routes

BART Line

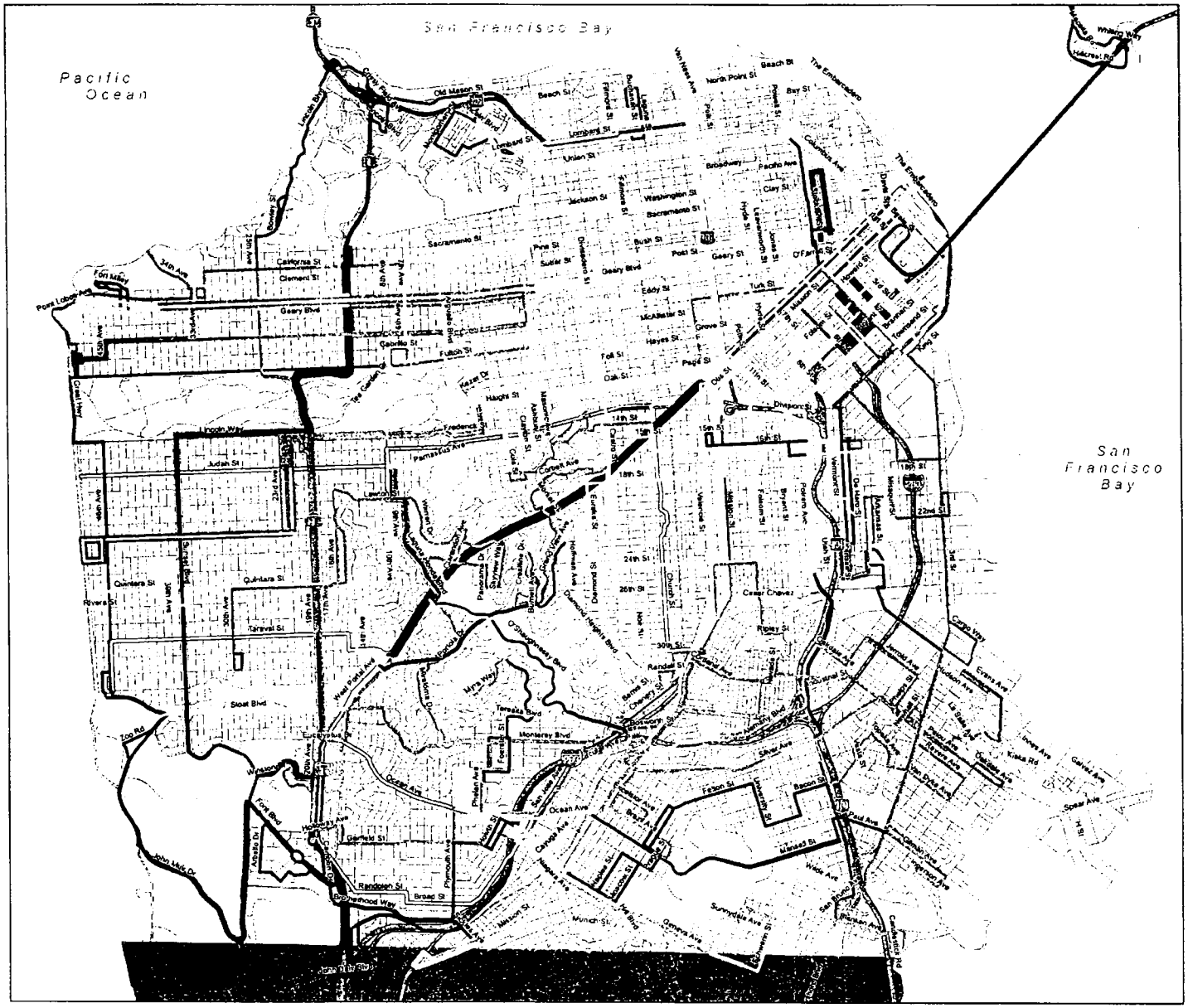
Freeway/Highway

SFMTA | Municipal Transportation Agency

Data Source: SFMTA, SFCTA, SFGOV, MTC
2006-2007 (Pre-T Line)

0 0.5 1 2 Miles

TMD



Actual Operating Speed (Without Dwell)

SFMTA Bus and Rail Network

Route Segment Performance

(Miles Per Hour)

- More than 12.5
- 10.0 - 12.5
- 7.5 - 10.0
- 5.0 - 7.5
- Less than 5.0

Not Shown: Non-Loading Express Route Segments And Non-Operating Routes

BART Line

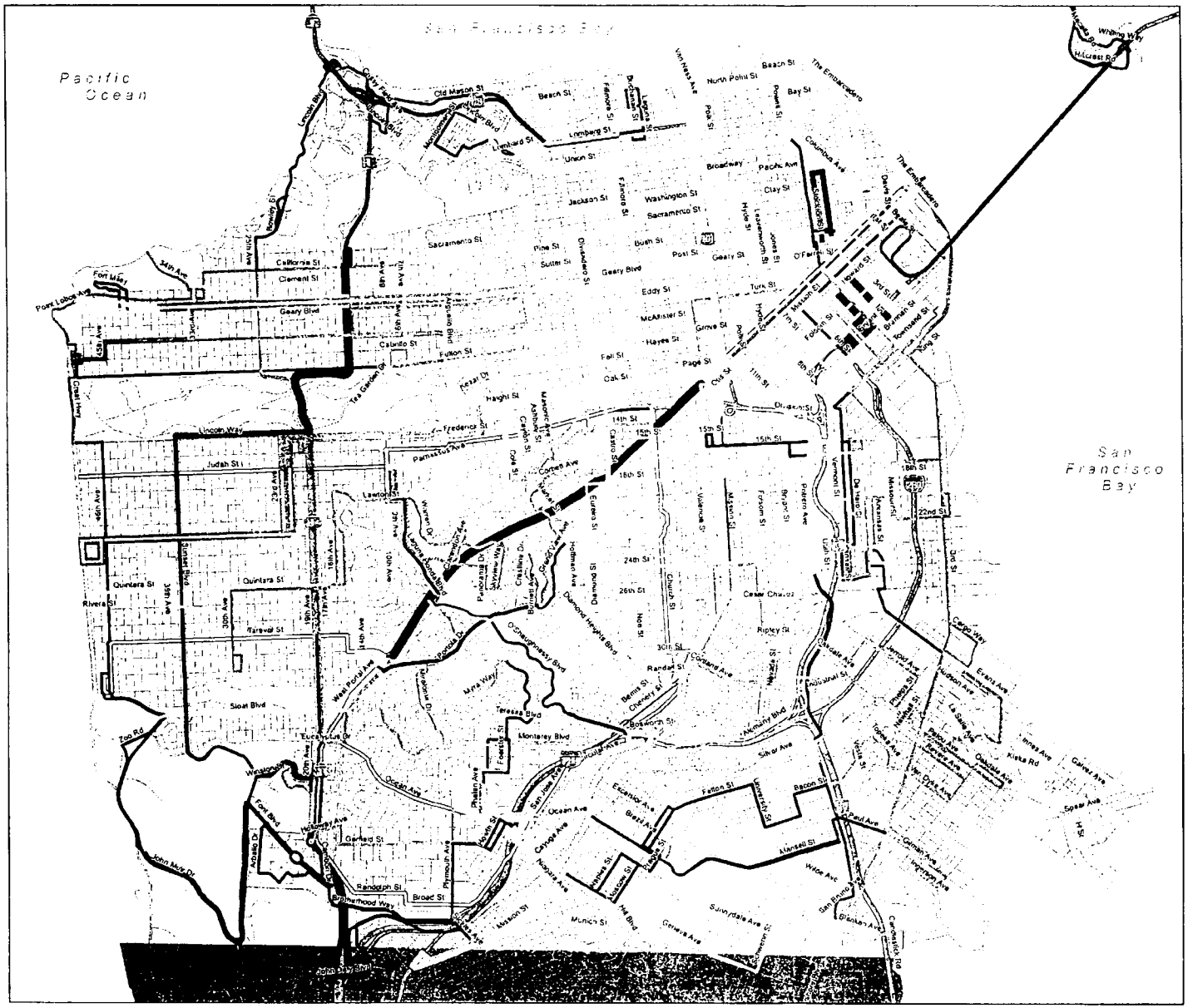
Freeway/Highway

SFMTA | Municipal Transportation Agency

Data Source: SFMTA, SFCTA, SFGOV, MTC
2006-2007 (Pre-T Line)

0 0.5 1 2 Miles

TMD



Actual Operating Speed (Without Dwell)

SFMTA Bus and Rail Network

Route Segment Performance

(Miles Per Hour)

- More than 12.5
- 10.0 - 12.5
- 7.5 - 10.0
- 5.0 - 7.5
- Less than 5.0

Not Shown: Non-Loading Express Route Segments And Non-Operating Routes

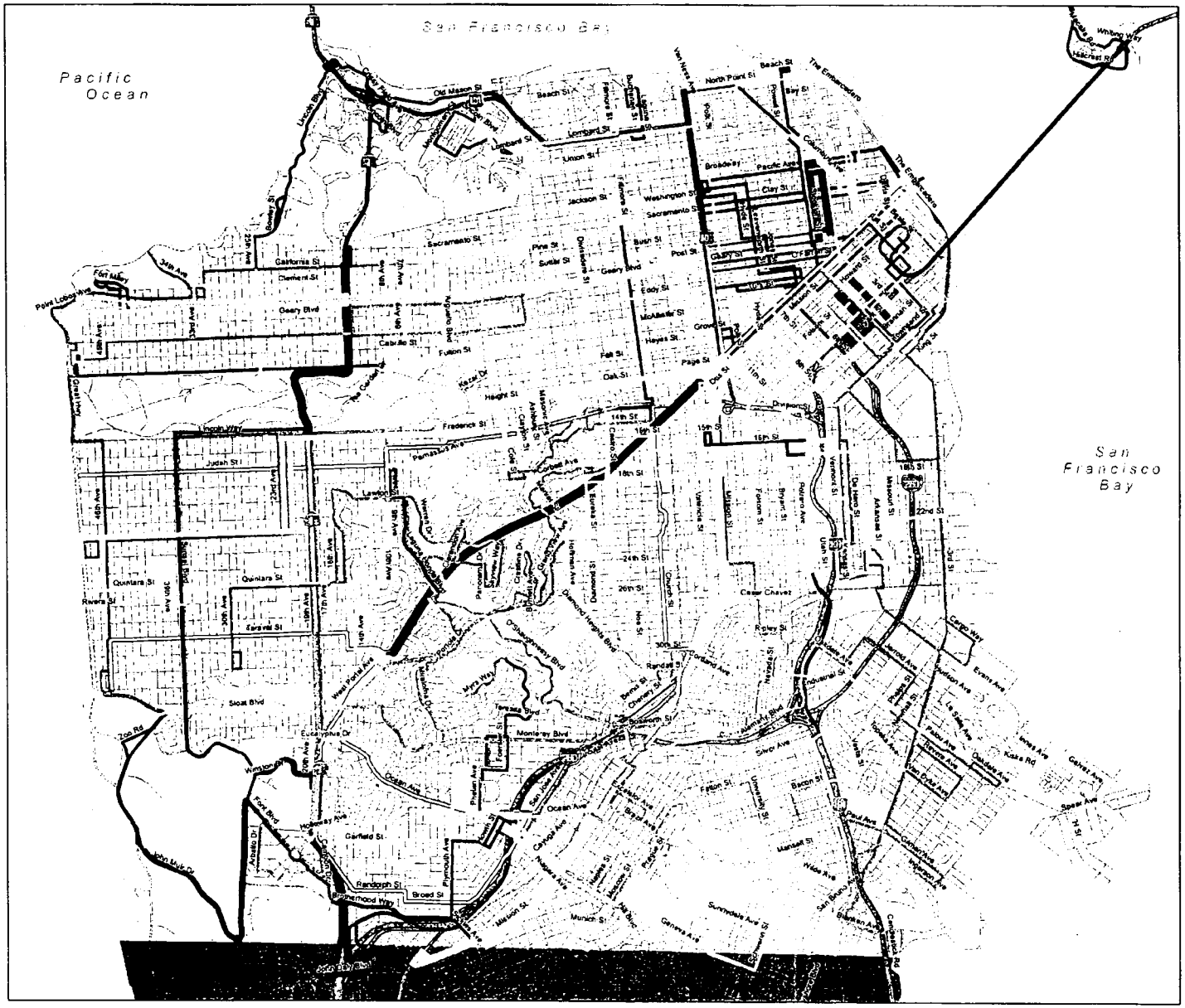
- BART Line
- Freeway/Highway

SFMTA | Municipal Transportation Agency

Data Source: SFMTA, SFCTA, SFGOV, MTC 2006-2007 (Pre-T Line)

0 0.5 1 2 Miles

TMD



Actual Operating Speed (With Dwell)

SFMTA Bus and Rail Network

Route Segment Performance

(Miles Per Hour)

- More than 12.5
- 10.0 - 12.5
- 7.5 - 10.0
- 5.0 - 7.5
- Less than 5.0

Not Shown: Non-Loading Express Route Segments And Non-Operating Routes

BART Line

Freeway/Highway

SFMTA | Municipal Transportation Agency

Data Source: SFMTA, SFCTA, SFGOV, MTC
2006-2007 (Pre-T Line)

0 0.5 1 2 Miles

TMD

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94612-3534
(510) 464-6000

November 5, 2007

Bill Wycko, Acting Environmental Review Office
San Francisco Planning Department
Balboa Station Area Plan DEIR
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Balboa Park Station Area Plan DEIR
Planning Department Case No. 2006.4000E

Dear Mr. Wycko:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Balboa Park Station Area Plan. BART staff has reviewed the analysis and respectfully submits the following general comments followed by more specific comments.

General Comments

#146

Comment 1:
As currently proposed, the Balboa Park Station Area Plan Project will provide a mix of land uses, including 1,780 new dwelling units, 104,620 square feet of commercial space, 19,000 square feet of cultural/institutional space and 129,300 square feet of open space. This land use mix will result in major new residential developments in close proximity to the Balboa Park BART Station. The project sponsor has proposed elements to enhance pedestrian, bicycle and transit access to the development sites. Through its Strategic Plan, adopted in 1999 and updated in 2003, BART supports urban infill projects with a strong pedestrian orientation and access to the local transit system.

#147

Comment 2:
The DEIR identifies PM peak hour transit trips, with 589 daily BART trips. BART is concerned that the number of trips assigned to transit, including BART and Muni, may be too low. Data from the Metropolitan Transportation Commission study "Characteristics of Rail and Ferry Station Area Residents in the San Francisco Bay Area: Evidence from the 2000 Bay Area Travel Survey" suggests that for commute trips in San Francisco County, rail (BART, Caltrain and Muni Metro) and very small percentage of ferry are the travel mode for approximately 17% of work trips from residences within ½-mile of a BART station, while buses were used for 17% of work trips. The DEIR identifies the SFCTA Model as the source for the transit mode split data. This data likely does not reflect the travel patterns and preferences from individuals who would be moving to the neighborhood to take advantage of the high-density residential development proposed as part of the project. The assumptions made in this analysis could understate the impact on BART, resulting in a significant impact to BART. The proportion of transit trips on BART and Muni should be re-examined using peer-reviewed research on transit mode generation rates to verify the significance on BART and Muni.

#148

Comment 3:
The City of San Francisco's Transit First Policy, which applies to this project, favors modes that have the potential to provide the greatest mobility for people, rather than vehicles. BART is also seeking to encourage more patrons to access stations by walking, bicycling or on transit. Through its strategic planning process, the BART Board has developed several policies to guide and support station access near BART stations. The Strategic Plan seeks to achieve a 10 percent shift in access mode splits, by reducing the percentage of parked single occupancy vehicles (relative to other access modes). The BART Access Guidelines establish an access hierarchy that prioritizes investments in walk, transit and bicycle access to station areas. The BART Sustainability Policy has a goal to "(e)nhance the use of resource-efficient and environmentally-friendly access modes (e.g., bikes, walking, etc.), and other sustainable features at BART's new and existing stations." Finally, the BART Station Area Planning Policy has a goal to "(p)romote transit ridership and enhance quality of life by encouraging and supporting transit-oriented development within walking distance of BART Stations and along transit corridors that serve BART Stations." These policies and guidelines support investment in the facilities that encourage alternative modes of access to a station.

In this context, BART has concerns regarding how residents, visitors and employees of the proposed Area Plan will access the Balboa Park BART Station, both during peak and off-peak periods. For example, in the DEIR analysis, the roadway reconfiguration of the intersections and freeway ramps around station (i.e. single point urban interchange) is proposed to improve pedestrian conditions and to calm traffic. However, the analysis shows that the opposite will happen. The ramp intersections will all worsen to LOS D or F, which will further increase pedestrian and bicycle conflicts. As a result of this significant impact, we recommend that mitigation measures be identified to reduce these conflicts.

Furthermore, given the high demand for multi-modal access at this station, BART would like the City of San Francisco to work with BART to prioritized improved pedestrian and bicycle access to the station as attractive as drive alone or drop-off access.

#149

Comment 4:
The DEIR analysis will help make critical decisions in meeting the needs of Muni and BART patrons in San Francisco and beyond. Moving a greater number of people through the Balboa Park Station during peak periods may require widening or adding escalators, platforms and stair channels; adding faregates and ticket vending machines; providing sufficient bicycle amenities, modifying air cooling and ventilation systems; and re-evaluating the ability of the emergency facilities to handle additional patrons.

For these reasons, BART is requesting that the following information be provided as part of this analysis:
- Discussion and analysis of the existing mode split for auto, transit, pedestrians and bicycles with mode splits for 2025 with and without the Area Plan.
- Existing and projected 2025 ridership figures for:
    - southbound and northbound trains
    - during the weekday AM and PM Peak Hour
    - with and without the Area Plan

#150

Comment 5:
While the Upper Yard is not environmentally cleared in the DEIR, we suggest that there be a more detailed discussion of BART and Muni's efforts to jointly develop the site that provides for accessible connection and transfer between BART and Muni patrons and provides for taxi, carpool, van and shuttle drop-offs. Furthermore, it should also mention the need to provide access by BART Operations.

Specific Comments

#151 **Chapter III**
Project Description
- Page 84, Figure 5. The diagram for the proposed transportation improvements at the BART station is difficult to understand. It would be helpful to include a diagram that clearly illustrates the existing and proposed roadway and transit changes (see page 106 of the Draft Balboa Park Station Area Plan).

#152
- Page 84, Figure 5. Please clarify as the status of the proposal for the M-line to terminate below the Upper Yard at the BART mezzanine. There was prior discussion to drop this concept for further consideration. Past analysis showed that there was not enough space to accommodate the extension of the Muni line and joint development of the Upper Yard parcel. This issue was raised in our September 5, 2006 comment letter on the Balboa Park Station Area Plan Initial Study.

#153
- Page 87, Transit Facility Changes (ii). Muni light rail tracks and platforms would be constructed by Muni on Caltrans property, not Muni property.

#154
- Page 105, Tier 1: Near-Term Development (2010). In the bulleted summary of the Upper Yard parcel, please clarify the proposed height for this development.

#155 **Chapter IV**
A. Land Use, Plans, and Policies
- Page 126, Bay Area Rapid Transit District (BART) Station Area Plans and Policies. This discussion should include a summary of our TOD Policy that was adopted in July 2005. Here is the link - http://www.bart.gov/docs/planning/BART%20TOD%20Policy.pdf.

#156
- Page 128, paragraph 2. The BART CSP was developed in tandem with the Balboa Park Station Area Plan and with support from partners including the City, MUNI, BART, Caltrans, City College, and neighborhood groups and residents. Recommended improvements from the CSP are also highlighted in the Station Area Plan. Please explain why they are not specified in the Area Plan.

#157 **Chapter VIII**
Draft Distribution List
- Page 366. This list contains many people who are no longer at that address / agency or have since passed away and should be updated. Hard copies of the marked up pages will be attached to this letter.

We look forward to working closely with the City and Muni to discuss and resolve many of these issues as the project continues to progress. Thank you for considering our comments. Please contact me at (510) 287-4705 with questions.

Sincerely,

Tim Chan
Senior Planner

attachment

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Flex your power!
Be energy efficient!

November 5, 2007

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San Francisco Planning Department
City and County of San Francisco
1600 Mission Street, 5th Floor
San Francisco, CA 94103-2414

SF280130
SF-280-R1.77
SCH#2006072114

Dear Ms. Chan:

Case No. 2004.1059E: Balboa Park Station Area Plan – Draft Environmental Impact Report (DEIR) and Traffic Impact Study (TIS)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the proposed project. The comments presented below are based on the DEIR and TIS for the Balboa Park Station Area Plan.

#158 V. Mitigation Measures: Ocean Avenue/I-280 Northbound On-Ramp. This section proposes to stripe an exclusive right-turn lane at the westbound approach in order to improve operating conditions to acceptable levels. Exclusive right-turn lanes can give motorists the mistaken impression that they have the right-of-way (ROW) over pedestrians. With that in mind, consider describing pedestrian safety counter measures to employ at the east-west crossing of this intersection. Examples include high-visibility crosswalks, channelizing the turn for trucks such that a pedestrian refuge island can be provided, or using striping to visually extend the northeast corner while accommodating trucks.

#159 The reports document the project's potential impact on future traffic conditions. However, it needs to provide further description regarding San Francisco Municipal Transportation Agency's (MTA's) view on the proposed mitigation plans. It appears that none of the proposed mitigation measures can be deployed without MTA's approval. What would be the consequences or alternative mitigation, if MTA does not agree?

#160 The reports state that the plan proposes a single-point interchange that would consolidate the on-and off ramps at Geneva and Ocean Avenue so that there would be only one on- and off-ramp for each freeway direction. The report also states that the proposed change will result in the off-ramp operating at level of service (LOS) F and off-ramp queue backing up to I-280. The impact on the freeway system as a result of this queue needs to be evaluated, since this would significantly affect not only the off-ramp but also the entire freeway traffic approaching that off-ramp. It is likely that this will not only increase system-wide delay but also create safety issues. The report defers any analysis of the impacts to a subsequent

#160 cont.

environmental review & approval phase. If the interchange improvements are included as part of this plan, the impacts of the off-ramp queue and any mitigation need to be evaluated in this analysis.

#161

Tables 20, 25, 30, 33, and 37 show freeway ramp level of service and density, which are based on freeway counts taken from "2004 Traffic Volumes on the California State Highway System". The count data in the referenced document does not have sufficient detail from which to derive peak period ramp or freeway density. Accordingly, the values shown in these tables are not meaningful and should be revised based on appropriate data.

#162

Encroachment Permit

Any work or traffic control within the State ROW requires an encroachment permit that is issued by the Department. Traffic-related mitigation measures will be incorporated into the construction plans during the encroachment permit process. See the following website link for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits/

To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans which clearly indicate State ROW to the address at the top of this letterhead, marked ATTN: Michael Condie, Mail Stop #5E.

Should you have any questions regarding this letter, please call Lisa Carboni at (510) 622-5491.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

Attachment 2: Greenhouse Gas Memorandum

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Orion Environmental Associates
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Memorandum

To: Susan Yogi and Tammy Chan, EDAW Inc.

From: Valerie Chew Geier, Orion Environmental Associates

Date: October 27, 2008

Subject: Balboa Park Station Area Plan EIR – Calculation of Greenhouse Gas Emissions/CO_2-Equivalents

Introduction

Greenhouse gases (GHGs) are the six gases identified in the Kyoto Protocol: carbon dioxide (CO_2), nitrous oxide (N_2O), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF_6). GHGs emitted from fuel combustion are CO_2, N_2O, and CH_4 and they relate directly to a project's construction (combustion of fuels to operate heavy equipment) and operation (traffic generated by the project, area source emissions associated with building heating/cooling, indirect emissions associated with the project's electricity and water demand, and landfill gas generation from project-related solid waste). This analysis calculates GHG emissions (also referred to as CO_2-Equivalents) associated with project construction and operation.

Project Description

As requested, we have estimated greenhouse gas emissions (GHGs) that would be generated by the proposed mixed-use project during construction and operation. Four scenarios were analyzed as follows:

- Kragen Site: 175 condos, 5,000 sq. ft. general retail, & 30,000 sq. ft. supermarket – 2010 completion
- Phelan Site: 80 condos, 15,000 sq. ft. general retail – 2010 completion
- Tier 1 (including Kragen & Phelan): 790 condos, 44,700 sq. ft. general retail, 30,000 sq. ft. supermarket, 12,000 sq. ft. civic uses – 2010 completion
- Tier 1 + Tier 2: 1,780 condos, 74,620 general retail, 30,000 sq. ft. supermarket, 19,000 sq. ft. civic (library) – 2025 completion

Approach and Methodology

To date, there is no adopted methodology for calculating GHG emissions and there is no single model that can estimate GHG emissions associated with a development project.

Therefore, GHG emissions were estimated using various pertinent procedures presented in the following models and reports:

- URBEMIS2007, Version 9.2.4
- California Climate Action Registry (CCAR), *General Reporting Protocol (Version 2.2)* (March 2007)
- South Coast Air Quality Management District (SCAQMD), *CEQA Air Quality Handbook, Appendix 9* (1993)
- California Air Resources Board (California ARB), *Proposed Methodology to Model Carbon Dioxide Emissions and Estimate Fuel Economy.*
- California Energy Commission, *Commercial Electricity Use, PG&E Systemwide*
- California Integrated Waste Management Board, *Waste Generation Rates*

Table 1 shows how results from the hybrid model that was used and applied to derive project estimates. This model was also used in the GHG emissions estimates in the Eastern Neighborhoods Rezoning and Area Plans Draft EIR (June 2007; SFEN). The SFEN model was updated as follows:

- The URBEMIS2007 model was used to estimate the project's CO_2 emissions related to project-related traffic increases and construction. However, the URBEMIS model does not estimate N_2O and CH_4 emissions. This analysis utilized a hybrid approach by adding the N_2O and CH_4 estimates from the SFEN model to the URBEMIS CO_2 results. For construction, N_2O and CH_4 emissions were added to the URBEMIS CO_2 construction estimates by adding an increment of 0.6 percent. This increment is based on CCAR protocol for N_2O and CH_4 emission factors for diesel fuel combustion, which indicates the following emissions for every gallon of diesel fuel: 10.15 kg CO_2 + 0.0294 kg CH_4 ((0.0014 kg CH_4 x CH_4 global warming potential of 21) + 0.031 kg N_2O (0.0001 kg N_2O times the N_2O global warming potential of 310) = 10.21 kg CO_2-Equivalents. Thus, URBEMIS CO_2 construction emissions estimates were increased by 0.6 percent to represent the project's GHG (CO_2-Equivalents) emissions related to construction.
- Electrical consumption was calculated for the residential component based on the PG&E-systemwide average per residence, and combined with the PG&E consumption factor per square foot for non-residential uses. Civic uses were assumed to be comparable to office uses. N_2O and CH_4 emissions were calculated using factors from the CCAR Protocols. The global warming potentials for N_2O and CH_4 were updated to reflect the latest published data (October 2007, 4th IPCC Assessment).
- Solid waste emissions were calculated based upon the BAAQMD source inventory allocated to residential use, and landfill gas emissions from non-residential uses were determined from waste generation rates and anaerobic decomposition factors supplied by the California Integrated Waste Management Board.

- Natural gas combustion emissions were calculated using the South Coast AQMD CEQA Handbook consumption rates as incorporated into the URBEMIS model combined with CO_2 and other GWP gas emission rates.

While San Francisco's population and businesses are expected to increase, overall projected water demand for San Francisco in 2030 is expected to decrease from current water demand due to improvements in plumbing code requirements and additional water conservation measures implemented by the San Francisco Pubic Utilities Commission (SFPUC). Given the anticipated degree of water conservation, GHG emissions associated with the transport and treatment of water usage would similarly decrease through 2030, and therefore increased GHG emissions from water usage is not expected.

Table 1
Summary of GHG (CO_2-Equivalents) Emissions (tons/year)

Analysis Scenario	Construction	Transpor-tation	Heating & Hot Water	Electricity Consumption	Solid Waste	TOTAL
Kragen (2010)	194	5,532	579	989	304	7,598
Phelan (2010)	227	1,578	262	246	136	2,449
Tier 1[a] (2010)	606[b]	13,547	2,455	2,489	1,176	20,274
Tier 1 + Tier 2 (2025)	200	23,312	5,387	4,628	2,474	36,001

NOTE: Detailed calculation results by scenario are available for review as part of the project file at the San Francisco Planning Department, 1650 Mission Street, Fourth Floor.

[a] Includes Kragen & Phelan
[b] GHG emissions for Tier 1 are averaged over two years, and are considered conservatively high since it is unlikely that Tier 1 development would build out over the next two years (2010). Development of Tier 1 is more likely to occur over the full buildout period (2025) so that annual GHG construction emissions would be more similar to those estimated for the Tier 1 + Tier 2 scenario.

Findings

There are no adopted thresholds of significance for GHG emissions. The latest guidance from the Governor's Office of Planning and Research (OPR, June 19, 2008) acknowledges that lead agencies must formulate their own thresholds until statewide CEQA guidance is promulgated. The City and County of San Francisco considers a project to have a significant impact if it were to:

- Conflict with the state goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32 (California Global Warming Solutions Act of 2006), such that the project's GHG emissions would result in a substantial contribution to global climate change; and

- Conflict with San Francisco's Climate Action Plan such that it would impede implementation of the local greenhouse gas reduction goals established by San Francisco's Greenhouse Gas Reduction Ordinance.

Table 1 compares results from the GHG model for the four development scenarios analyzed. In accordance with AB 32, the Global Warming Solutions Act, California began implementing a statewide GHG emissions limit, which is designed to reduce emissions to 1990 levels by 2020. The 2020 GHG emissions limit for California, as adopted by CARB in December of 2007 is approximately 427 million metric tons of CO_2-Equivalents. When compared to the statewide GHG emissions limit, GHG emissions associated with the Kragen and Phelan sites would represent 0.0018% and 0.0006%, respectively, of this 2020 limit. Implementation of the Tier 1 Scenario would generate GHG emissions equivalent to 0.0048% of this 2020 limit, while emissions associated with the Tier 1 + Tier 2 Scenario would represent 0.0084% of this 2020 limit. Within the Bay Area, GHG emissions associated with the Kragen and Phelan sites would represent 0.0087% and 0.0026%, respectively, of total GHG emissions estimated for the entire Bay Area (2002).[1] Implementation of the Tier 1 Scenario would generate GHG emissions equivalent to 0.023% of the Bay Area total GHG emissions, while emissions associated with the Tier 1 + Tier 2 Scenario would represent 0.042% of the Bay Area total. Therefore, the proposed project would not generate sufficient emissions of GHGs to contribute considerably to the cumulative effects of GHG emissions such that it would impair the state's ability to implement AB32, nor would the proposed project conflict with San Francisco's local actions to reduce GHG emissions.
The OPR Technical Advisory (June 19, 2008) identifies five categories of GHG reduction measures that should be considered in future development:

1. Implement land use strategies that encourage use of alternatives to the single occupant vehicle or that optimize the efficiency of the existing transportation system.

2. Incorporate urban forestry into project designs to reduce heating/cooling loads and to sequester carbon,

3. Implement energy conservation programs in building design and promote alternative energy sources.

4. Reduce vehicle miles traveled through use of multi-occupant vehicles

5. Reduce solid waste generation and improve recycling rates.

There are additional GHG reduction measures outlined by CAPCOA (California Air Pollution Control Officers Association, *CEQA and Climate Change,* January 2008) as well as California Air Resources Board (CARB, *Climate Change Draft Scoping Plan,* June 2008). While these guidelines address GHG emissions from a wide array of stationary and mobile sources, guidelines relating to land use development emphasize locating new development

[1] The Bay Area Air Quality Management District reported regional Bay Area GHGs emissions in 2002 at approximately 85 million CO_2-Equivalent tons. Bay Area 2002 GHG emissions are used as the baseline for determining whether a project's contributions are significant as these are the most recent emissions inventory for the Bay Area.

appropriately to encourage use of alternative modes of transportation (including transit, walking, and bicycling) and incorporating energy conservation measures into building/development designs and expanding/strengthening existing energy efficiency programs. At present, buildings account for 30 percent of greenhouse gas emissions.[2]

In addition to these guidelines, the State of California Attorney General's office has compiled a list of GHG reduction measures that could be applied to a diverse range of projects, including the following:[3]

1. Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods.

2. Design buildings to be energy efficient, installing efficient lighting, light colored cool roofs, cool pavements, energy efficient heating and cooling systems, etc.

3. Reuse and recycle construction and demolition waste.

New construction within the Project Area will be required to incorporate energy efficiency measures, which would be consistent with the goals and policies as set forth in the City's Energy Policy of the General Plan, 1997 Sustainability Plan, 2002 Electricity Resource Plan, 2002 Climate Action Plan, and 2008 Greenhouse Gas Reduction Ordinance.

Through these plans and ordinances, San Francisco has been actively pursuing cleaner energy, transportation and solid waste policies. In an independent review of San Francisco's communitywide emissions it was reported that San Francisco has achieved a 5% reduction in communitywide greenhouse gas emissions below the Kyoto Protocol 1990 baseline levels. The 1997 Kyoto Protocol sets a greenhouse gas reduction target of 7% below 1990 levels by 2012. The "communitywide inventory" includes greenhouse gas emissions generated by San Francisco by residents, businesses, and commuters, as well as municipal operations. The inventory also includes emissions from both transportation sources and from building energy sources. Probable future greenhouse gas reductions will be realized by implementation of San Francisco's recently approved Green Building Ordinance. Additionally, the recommendations outlined in the Draft AB 32 Scoping Plan will likely realize major reductions in vehicle emissions.

The proposed *Balboa Park Station Area Plan* would fulfill all five of the above-listed OPR categories of GHG reduction measures and CAPCOA GHG reduction measures. The proposed *Balboa Park Station Area Plan* would encourage use of alternative transportation modes, which would help reduce transportation-related GHG emissions, relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available. In addition, GHG emissions increases from projected growth and development within the Project Area would be less than would result if this

[2] U.S. Green Building Council, website accessed on September 17, 2007: http://www.usgbc.org/DisplayPage.aspx?CMSPageID=291

[3] State of California, Department of Justice, "The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level." Updated 3/11/08. Available at: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf. Accessed 04/11/2008.

growth occurred in outlying areas of the air basin, where trip lengths would be longer. Moreover, the project's emphasis on creating relatively higher-density, mixed-use development patterns would be expected to make walking and other non-vehicular travel more viable than would be the case for similar population and employment growth in lower-density, single use neighborhoods elsewhere. Providing high density, transit oriented development to accommodate projected population demands reduces per capita GHG emissions by promoting alternative modes of transportation and providing employment opportunities within the neighborhood, thereby decreasing individual reliance on motor-vehicles. Therefore, the proposed plan's transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco.[4]

New construction within the Project Area will also be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, requirements of pertinent City ordinances such as the Residential Energy Conservation Ordinance, and emissions reduction actions included in the San Francisco Climate Action Plan, helping to reduce future energy demand as well as reduce the project's contribution to regional GHG emissions. In addition, new construction in the Project Area would be subject to requirements of the City's proposed Green Building Ordinance. Incorporation of energy efficiency measures into future Project-related development projects as part of these ordinance requirements would also be consistent with CAPCOA and CARB energy conservation guidelines.

As part of the City's Green Building Ordinance, future development within the Project Area would also be required to divert at least 75 percent of all construction and demolition material from landfills, a 10 percent increase from the City's Construction Demolition and Debris Recovery Ordinance (Ordinance No. 27-06). The construction material required to be diverted from landfills would be consistent with the Attorney General's guidelines for reusing and recycling construction and demolition waste, reducing solid waste generation and improving recycling rates. The Green Building Ordinance also requires new development to provide areas for recycling, composting and trash storage that is convenient for all users, further supporting the Department of the Environment's zero waste campaign.

The *Balboa Park Station Area Plan* also incorporates urban forestry designs. New construction, additions, or changes of use within most zoning districts in San Francisco (including the zoning districts within the *Balboa Park Station Area Plan*) must comply with Planning Code Section 143 which requires the owner or developer to install a minimum of one 15-gallon size street tree for every 20 feet of frontage of a property along a street or alley. Streets within the *Balboa Park Station Area Plan* would also be built to the standards outlined in the San Francisco *Better Streets Plan.* The *Better Streets Plan* includes urban forest guidelines that encourage planting of trees and understory vegetation within the urban streetscape. The guidelines consider the appropriate size and placement of trees, as well as appropriate species selection based on San Francisco's unique microclimates. Therefore,

[4] The California Air Pollution Control Officer's, *CEQA and Climate Change* (January 2008) white paper identifies infill development as yielding a "high" emissions reduction score (between 3-30%). This paper is available online at: http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf. Accessed April 15, 2008.

the *Balboa Park Station Area Plan* would incorporate urban forestry design elements that would incrementally reduce the heating/cooling loads and aid in carbon sequestration.

Thus, it can be fairly stated that GHG emissions related to the proposed *Balboa Park Station Area Plan* would likely be of lesser intensity than for residential and commercial development of comparable magnitude in a less dense, more sprawling environment. It can be stated with equal clarity that enhancements to transit service in the Project Area and vicinity, residential infill, and commercial development to provide employment opportunities near residential neighborhoods, would all combine to reduce GHG emissions that would otherwise be generated by increased vehicle travel. Given all the factors to minimize vehicle trip lengths and incorporate energy efficiency measures as required by city mandates/ordinances, the proposed *Balboa Park Station Area Plan* would not conflict with the State's goals of reducing GHG emissions to 1990 levels by 2020, and the project's impact on GHG emissions would be less than significant. Furthermore, the proposed plan would not conflict with the City's ability to meet GHG reduction goals. Strategies, guidelines, and policies of the proposed *Balboa Park Station Area Plan* that would promote sustainability and reduction of GHGs include the following:

- Key Strategy of the Plan: *Improve the functioning of Balboa Park Station as a regional transit hub so that it efficiently accommodates BART, Muni light rail and buses, bicycles, taxis, automobile drop-off and pick-up, and pedestrians.*
- Key Strategy of the Plan: *Re-design the Project Area streets, particularly main streets such as Geneva, Ocean, San Jose, and Phelan Avenues, to emphasize their multi-purpose character as pedestrian-friendly civic spaces and multi-modal movement corridors.*
- Urban Design and Architectural Guidelines: *Separating pedestrian traffic and vehicular traffic on busy streets; providing other street furniture, including… bicycle racks;*
- Revision to Existing Policy: *Introduce new transit-oriented, mixed-use development on opportunity sites in the Transit Station Neighborhood.*

It should also be noted that the CARB Draft Scoping Plan includes a variety of other GHG reduction measures that will be implemented (e.g., clean car standards, Low Carbon Fuel Standard, etc.) and implementation of these statewide programs will ultimately reduce the project's transportation-related GHG emissions.

In summary, the proposed project would not contribute significantly, either individually or cumulatively,[5] to global climate change given that: (1) implementation of the proposed

[5] OPR's guidance states that, "Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project". And, "In determining whether a proposed project's

Balboa Park Station Area Plan would not contribute significantly to global climate change such that it would impede the State's ability to meet its GHG reduction targets under AB 32, or impede San Francisco's ability to meet its GHG reduction targets under the Greenhouse Gas Reduction Ordinance; (2) San Francisco has implemented programs to reduce GHG emissions specific to new construction of residential and commercial development within the Project Area; (3) San Francisco's sustainable policies have resulted in the measured success of reduced GHG emissions levels; and (4) current and probable future state and local GHG reduction measures will continue to reduce contributions to climate change that would be associated with future development within the Project Area.

emissions are cumulatively considerable, the lead agency must consider the impact of the project when viewed in connection with the effects of "past, current and probable future projects."

Attachment 3: Figures 1, 2 and 10 of DEIR

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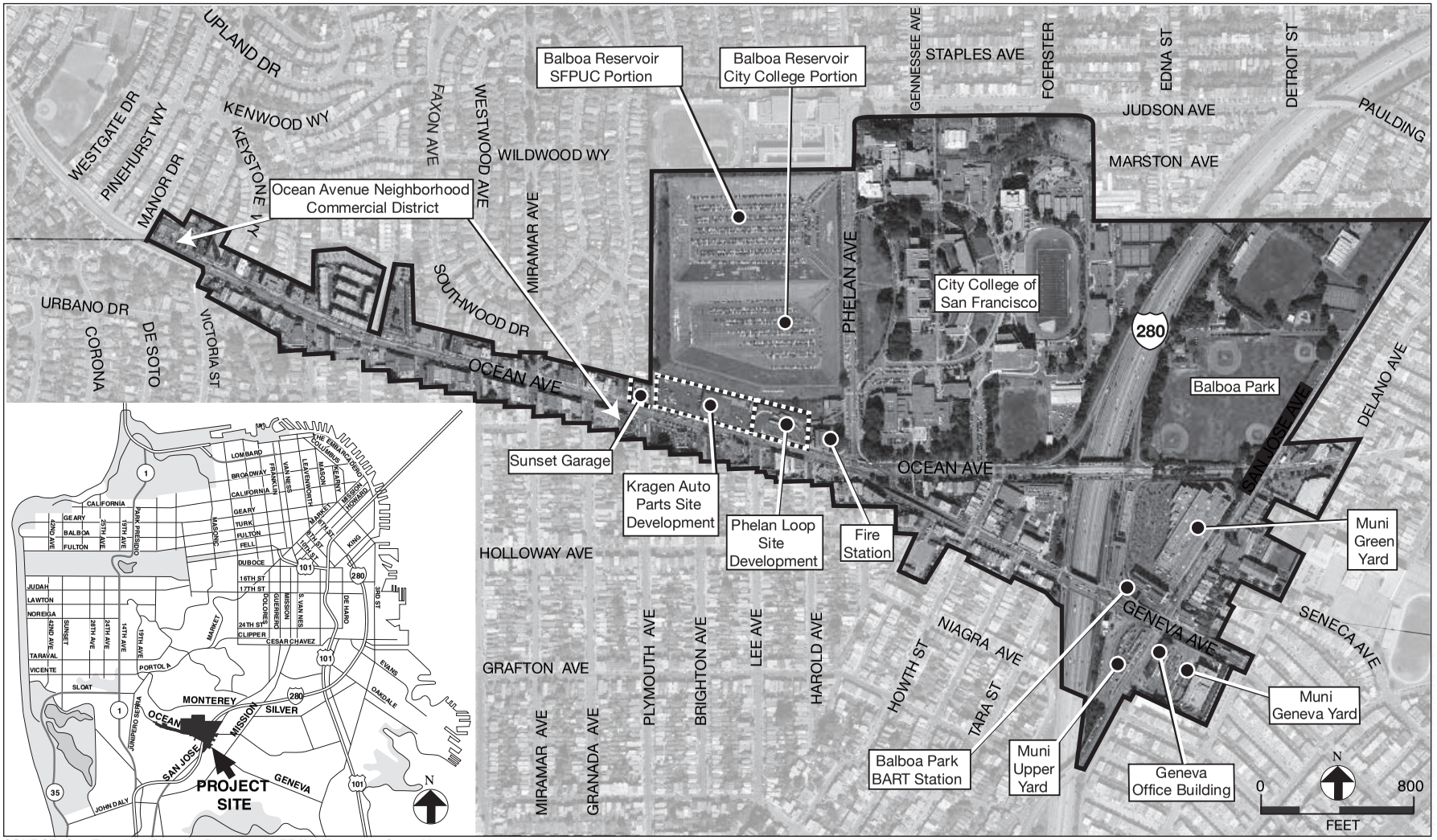
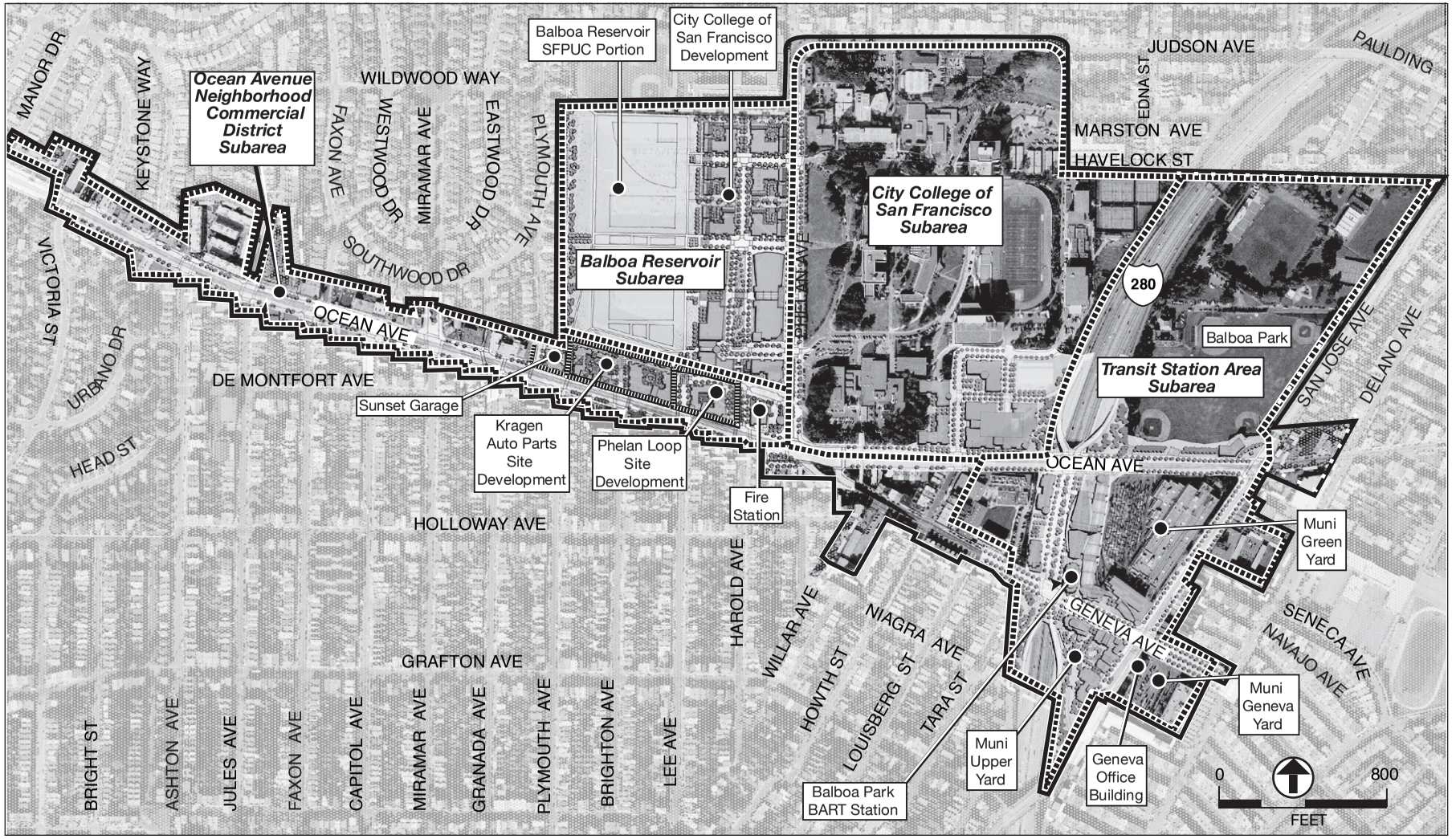


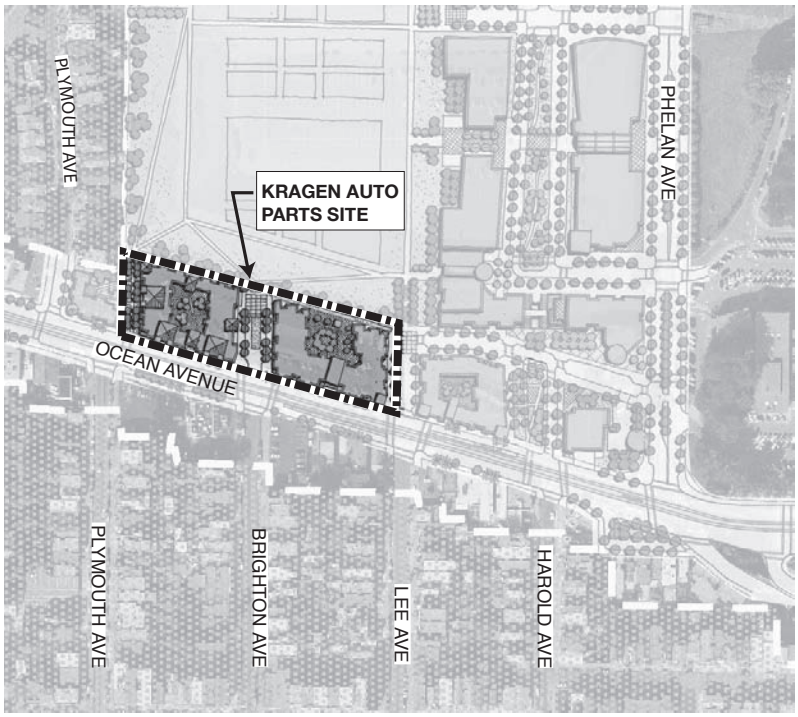
SOURCE: San Francisco Planning Department, EDAW, Turnstone Consulting

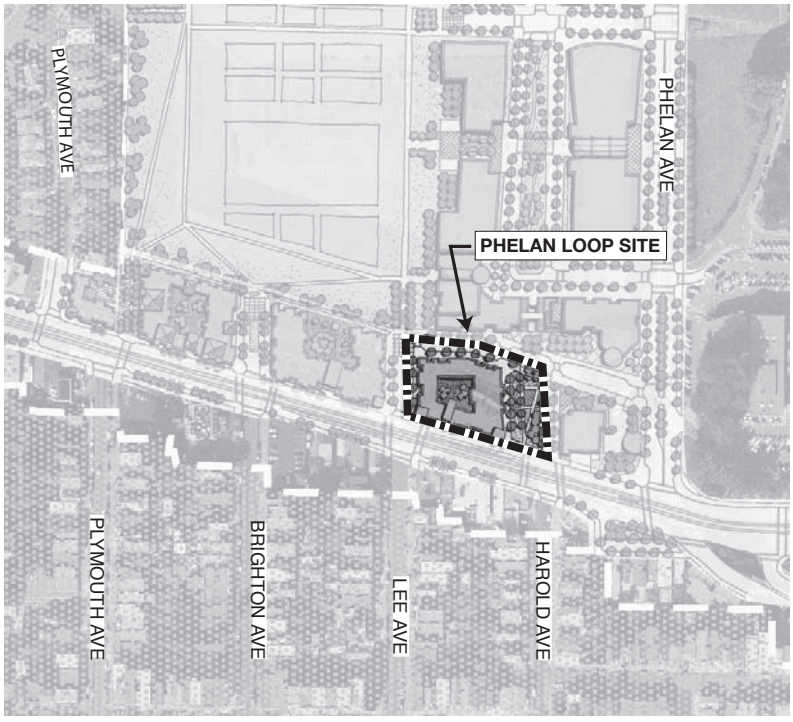
FIGURE 1: PROJECT LOCATION



SOURCE: San Francisco Planning Department, EDAW, Turnstone Consulting

FIGURE 2: PROJECT AREA PLAN





NOT TO SCALE

SOURCE: San Francisco Planning Department, EDAW, Turnstone Consulting

FIGURE 10: PROPOSED DEVELOPMENT AT PHELAN LOOP SITE AND KRAGEN AUTO PARTS SITE

Attachment 4: Historic Preservation Memo in Response to LPAB Comments

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SAN FRANCISCO
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MEMO

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DATE:	**September 9, 2008**
TO:	**Jeanie Poling, Major Environmental Analysis**
FROM:	**Sophie Middlebrook, Preservation Technical Specialist**
REVIEWED BY:	**Mark Luellen, Preservation Coordinator**
RE:	**Responses to Comments for the Balboa Area Plan DEIR**

The LPAB requested that the DEIR include a description of the potential historic district, and asked that the DEIR describe the boundaries of the potential district. The LPAB also asked that the document note that the El Rey movie theater is located within the described boundaries of the potential historic district.

Based on the preliminary findings of the Balboa Park Area Plan Historic Resource Survey, the identified boundaries of the Ocean Avenue Commercial Historic District run one parcel deep along Ocean Avenue from Lakewood Avenue to the west to San Jose Avenue to the East. The potential historic district includes the former El Rey movie theater, located on Ocean Avenue between Lakewood and Fairfield Avenues.

This boundary incorporates structures that exhibit integrity of both architectural style and setting in a manner that best provides a visual record of this commercial district during of the period of significance. Based on the preliminary findings of the Balboa Park Area Plan Historic Resource Survey, the period of significance for the Ocean Avenue Commercial District is 1915-1940.

The LPAB further commented that the Carey and Co. ratings listed on the survey matrix needed to be backed-up with information that describes why certain buildings were found to be not historic.

Currently, a full Historic Resource Survey, Context Statement, and Design Guidelines for the Ocean Avenue Historic District are underway. The Carey and Company matrix on which the LPAB commented was based on a reconnaissance-level survey of the Balboa Park Area Plan. The boundaries of the Ocean Avenue Historic District have been adjusted based on information assembled through the research and preparation of the Historic Context Statement. As the Historic Context Statement is finalized, Department of Recreation and Parks (DPR) 523 D Historic District Form (D-Form) will include an appendix that identifies each structure that contributes to the historic significance of the overall district.

The Board welcomes development that will meet the transit needs from outside of the district. The Board believes that it would be helpful if maps were included in the DEIR with the historic resources listed on the maps.

A map of the potential historic district along Ocean Avenue was included with the reconnaissance-level survey prepared by Carey and Company. As the results of the more in-depth Historic Resource Survey are finalized, a new map will be prepared that identifies both the boundaries of the potential historic district and the location of structures that are located within the Plan Area and individually eligible for the California Register of Historic Places.

Document1