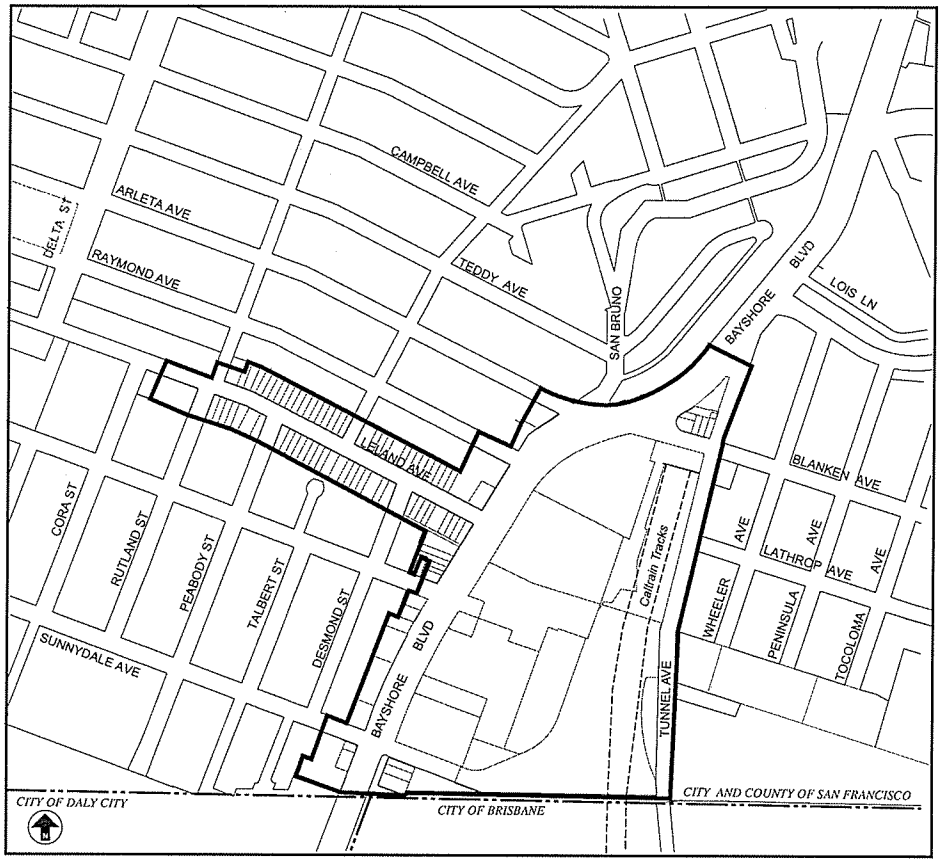
VISITACION VALLEY REDEVELOPMENT PROGRAM



ENVIRONMENTAL IMPACT REPORT

VOLUME 2: COMMENTS AND RESPONSES

SAN FRANCISCO PLANNING DEPARTMENT: 2006.1308
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Tom Evans, Lead Planner
San Francisco Redevelopment Agency
1 South Van Ness Avenue, Fifth Floor
San Francisco, CA 94103

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1. INTRODUCTION

1.1 PURPOSE OF THIS COMMENTS AND RESPONSES DOCUMENT

This Comments and Responses document responds to comments received on the Draft Environmental Impact Report (Draft EIR or DEIR) for the Visitacion Valley Redevelopment Program.

The San Francisco Redevelopment Agency ("Redevelopment Agency") and City and County of San Francisco Planning Department ("Planning Department") are considering adoption and implementation of the Visitacion Valley Redevelopment Program for an approximately 46-acre redevelopment project area in San Francisco's Visitacion Valley neighborhood. The proposed redevelopment program includes four elements: (1) a *Visitacion Valley Redevelopment Plan* (the "Redevelopment Plan"); (2) a community-derived *Visitacion Valley/Schlage Lock Design for Development* document (the "Design for Development"); (3) associated San Francisco General Plan amendments; and (4) related San Francisco Planning Code changes.

The proposed redevelopment program is intended to overcome adverse physical and economic conditions, foster revitalization and increased private economic investment, facilitate housing development opportunities near transit, and improve neighborhood-serving commercial development in the proposed redevelopment project area. The proposed redevelopment project area includes the vacant Schlage Lock property and adjacent underutilized industrial properties on the east side of Bayshore Boulevard, properties fronting on the west side of Bayshore Boulevard opposite the Schlage Lock property, and properties along the adjacent Leland Avenue commercial corridor.

The final environmental impact report (FEIR) for the Visitacion Valley Redevelopment Program--i.e., the EIR--consists of **two volumes:**

(1) the **Draft EIR** (DEIR), which was published and distributed for public review and comment on June 3, 2008; and

(2) this **Comments and Responses document**, which responds to comments received on the DEIR and includes associated revisions to the DEIR.

1.2 COMMENTS AND RESPONSES DOCUMENT ORGANIZATION

This Comments and Responses document includes the following sections:

- a **Responses to Comments on the Draft EIR** section (section 2) that includes:
  - -- an alphabetical list of all commenters on the DEIR (section 2.1), including all individuals, Planning Commissioners, Redevelopment Commissioners, and interested agency representatives that commented during the DEIR public review period; and

-- a Responses to Comments Grouped by Topic section (section 2.2) that summarizes (paraphrases) all comments received from the listed commenters, grouped by topic, with each comment assigned a letter-number code, followed by the written response of the EIR authors to the comment;

- a **Revisions to the Draft EIR** section (section 3) that includes all revisions made to the DEIR in response to the comments received during the DEIR public review period; and

- a set of FEIR **Appendices** (section 4) which includes:

  -- a **Responses to June 26, 2008 San Francisco Planning Commission Meeting Comments on the Draft EIR** section (Appendix 4.1), which includes a reiteration of those comments from section 2 above (Responses to Comments Grouped by Topic) that were made at the June 26, 2008 Planning Commission meeting, in the order that they were made and a reiteration of the associated written responses of the EIR authors from section 2;

  -- a **Responses to July 1, 2008 San Francisco Redevelopment Commission Meeting Comments on the Draft EIR** section (Appendix 4.2), which includes a reiteration of those comments from section 2 (Responses to Comments Grouped by Topic) that were made at the July 1, 2008 Redevelopment Commission meeting, in the order that they were made, and a reiteration of the associated written response of the EIR authors from section 2;

  -- a **Responses to Written Comments on the Draft EIR** section (Appendix 4.3), which includes a reiteration of those comments from section 2 (Responses to Comments Grouped by Topic) that were submitted in writing during the DEIR public review period, and a reiteration of the associated written responses of the EIR authors from section 2 (this section includes copies of each letter, memo and email received, each followed by the EIR authors responses to comments therein pertaining to CEQA and/or the adequacy of the EIR);

  -- a **Remediation Status Update for Redevelopment Zone 1** section (Appendix 4.4), which includes (1) a description of a recent Schlage Lock property owner settlement agreement regarding remediation responsibility; and (2) updated documentation on the current status of the soil and groundwater remediation program being undertaken on the Schlage Lock site (Redevelopment Zone 1) in the Project area; and

  -- a **Supplemental Transportation Information** section (Appendix 4.5), which includes a lane configuration and signal timing plan and intersection level of service analysis model output for additional intersection evaluations completed in response to comments received on the DEIR.

The EIR for the Visitacion Valley Redevelopment Program (the "Project") has been prepared by the Redevelopment Agency and Planning Department as co-Lead Agencies,[1] pursuant to all

[1]CEQA Guidelines define the "Lead Agency" as the public agency that has the principal responsibility for carrying out or approving a project. The Redevelopment Agency and Planning Department would each be responsible for carrying out components of the proposed redevelopment program, including making various specific future implementation decisions.

relevant sections of the California Environmental Quality Act ("CEQA") and California Community Redevelopment Law.

Certification of the EIR by the Planning Commission and Redevelopment Commission must occur prior to any final action by either of the two commissions on the proposed Visitacion Valley redevelopment program.

Both volumes of the EIR are also provided in PDF format on the San Francisco Planning Department and San Francisco Redevelopment Agency websites and are available from either of these two sources on a CD or as a hard copy.

1.3 FINAL EIR PUBLIC MEETINGS AND CERTIFICATION

This Comments and Responses document, along with the companion DEIR document, will be considered by the Redevelopment Commission in a public meeting on December 16, 2008, at which time the Redevelopment Commission will determine whether to certify the FEIR as complete and adequate. This Comments and Responses document, along with the DEIR document, will also be considered by the Planning Commission in a public meeting on December 18, 2008, at which time the Planning Commission will determine whether to certify the FEIR as complete and adequate.

2. RESPONSES TO COMMENTS ON THE DRAFT EIR

After completion of the Draft EIR, the Lead Agency is required under CEQA Guidelines sections 15086 (Consultation Concerning Draft EIR) and 15088 (Evaluation of and Response to Comments) to consult with and obtain comments from other public agencies having jurisdiction by law with respect to the project and to provide the general public with an opportunity to comment on the Draft EIR. Under CEQA Guidelines section 15088, the Lead Agency is also required to respond in writing to substantive environmental points raised in this Draft EIR review and consultation process. The Redevelopment Agency and Planning Department are acting as co-Lead Agencies for this project.

A Notice of Preparation (NOP) of a Draft EIR, dated January 31, 2007, was issued to interested and responsible agencies in early February 2007. The Draft EIR was distributed for public review and comment on June 3, 2008. An associated Public Notice of (Draft EIR) Availability (NOA) and Public Hearing, dated June 3, 2008, was distributed to the Governor's Office of Planning and Research (State Clearinghouse), potentially-affected taxing agencies, and approximately 2,400 local addresses in the project vicinity, including all members of the Visitacion Valley Citizens Advisory Committee (CAC), community members and organizations on the CAC mailing list, as well as owners of properties within the Project Area and within a 300-foot radius from the boundary of the Project Area.

The 45-day public review period for the Draft EIR began on June 3, 2008. Two public hearings were conducted to consider the adequacy of the Draft EIR--one by the San Francisco Planning Commission at its regular meeting on June 26, 2008, and one by the San Francisco Redevelopment Commission at its regular meeting on July 1, 2008. The state-mandated 45-day public comment period on the Draft EIR ended on July 21, 2008.

Comments on the Draft EIR were submitted in the form of public testimony and Commissioner comments at the two public hearings, and letters, memoranda and e-mails received by the Planning Department and Redevelopment Agency during the Draft EIR public review period. Two individuals and three Planning Commissioners commented on the project or EIR during the June 26, 2008 Planning Commission public hearing and five individuals and four Redevelopment Commissioners commented on the project or EIR during the July 1, 2008 Redevelopment Commission public hearing. Twelve (12) letters, memoranda and e-mails were received during the 45-day public review period with comments on the EIR.

CEQA Guidelines section 15132 (Contents of Final Environmental Impact Report) requires that the Final EIR include: (1) the full set of comments and recommendations received on the Draft EIR during the public review period, either verbatim or in summary; (2) a list of persons, organizations, and public agencies commenting on the Draft EIR; and (3) the responses of the Lead Agency to significant environmental points raised in the review and consultation process. In keeping with these guidelines, this Responses to Comments chapter includes the following:

- a ***list of the Draft EIR commenters*** (section 2.1) that lists alphabetically each individual, Planning Commissioner, Redevelopment Commissioner, and public agency

representative that commented at a public hearing or submitted written comments to the Planning Department or Redevelopment Agency during the Draft EIR public review period; and

- a set of ***responses to the Draft EIR comments received grouped by topic*** section (section 2.2) that summarizes (paraphrases) all comments received from the listed commenters grouped by topic, followed by the written response of the EIR authors to the comment.

Each public hearing and written comment received pertaining to CEQA or to the adequacy of the EIR has been assigned a letter number code--e.g., PC-1, PC-2, PC-3, etc. for each Planning Commission meeting comment; RC-1, RC-2, RC-3, etc. for each Redevelopment Commission meeting comment; and LR-1, LR-2, LR-3, etc., for each comment Letter (LR) received (i.e., each letter, memorandum or email).

The coded comments and responses grouped by topic in section 2.2 are also grouped by commenter in the following three FEIR appendices:

- **Appendix 4.1** (Responses to San Francisco Planning Commission Meeting Comments on the Draft EIR), which includes the minutes of the segment of the June 26, 2008 Planning Commission meeting devoted to the Draft EIR, with assigned letter-number codes (PC-1, PC-2, PC-3, etc.) posted in the right margin next to each public and Commissioner comment pertaining to CEQA or to the adequacy of the EIR; the set of coded minutes is then followed by a repeat of the summary of each comment and corresponding response, repeated from section 2.2;

- **Appendix 4.2** (Responses to San Francisco Redevelopment Commission Meeting Comments on the Draft EIR), which includes minutes of the segment of the July 1, 2008 Redevelopment Commission meeting devoted to the Draft EIR, with assigned letter/number codes (RC-1, RC-2, RC-3, etc.) posted in the right margin next to each public and Commissioner comment pertaining to CEQA or to the adequacy of the EIR; the set of coded minutes is then followed by a summary of each comment and corresponding response, repeated from section 2.2; and

- **Appendix 4.3** (Responses to Written Comments on the Draft EIR), which includes copies of the twelve letters, memoranda and e-mails received during the Draft EIR public review period, with the assigned letter/number codes (LR-1.01, LR-1.02, LR-1.03, LR-2.10, LR-2.02, LR-2.03, etc.) posted in the right margin next to each comment pertaining to CEQA or to the adequacy of the EIR; the set of coded minutes is then followed by a summary of each comment and corresponding response, repeated from section 2.2.

2.1 LIST OF DRAFT EIR COMMENTERS

The individuals, organizations, Planning Commissioners, Redevelopment Commissioners, and public agencies who commented on the Draft EIR at either the June 26, 2008 Planning Commission meeting, July 1, 2008 Redevelopment Commission meeting or in written form during the Draft EIR public review period are listed below alphabetically.

2.1.1 Individuals and Organizations

Chris Barnett, Visitacion Valley Citizens' Advisory Committee (PC 2)
David P. Cincotta, Jeffer Mangels Butler & Marmara (on behalf of Universal Paragon Corporation) (LR 10)
Francisco da Costa (RC 3)
Randall Evans (RC 5)
Espanda Jackson (RC 2)
Daniel Landry (RC 4)
M. Bridget Maley, President, San Francisco Landmarks Preservation Advisory Board (LR 4)
Fran Martin, Visitacion Valley Planning Alliance (PC 1, LR 8)
Russel Morine, Visitacion Valley Citizens' Advisory Committee (RC 1, LR 6)
Anne Seeman (LR 7)

2.1.2 San Francisco Planning Commissioners

Commission Vice President Ron Miguel (PC 4)
Commissioner Michael J. Antonini (PC 6)
Commissioner Kathrin Moore (PC 3, PC 5)

2.1.3 San Francisco Redevelopment Commission

Commission President Francee Covington (RC 8, RC 10)
Commission Vice President London Breed (RC 7)
Commissioner Linda A. Cheu (RC 9)
Commissioner Leroy Swig (RC 6)

2.1.4 Responsible and Interested Agencies

Rajiv Bhatia, MD, MPH, Director, Occupational and Environmental Health, San Francisco Department of Public Health (LR 2, LR 12)
Lisa Carboni, District Branch Chief, Local Development-Intergovernmental Review, State of California Department of Transportation (LR 11)
Sam Fielding, Rana Ahmadi, San Francisco Municipal Transportation Agency (LR 9)
Terry Roberts, Director, State Clearinghouse, State of California Governor's Office of Planning and Research (LR 5)
John A. Swiecki, AICP, Principal Planner, City of Brisbane (LR 3)
Karen Toth, P.E., Supervising Hazardous Substances Engineer I, State of California Department of Toxic Substances Control (LR 1)

2.2 RESPONSES TO COMMENTS GROUPED BY TOPIC

The following section includes a summary of each comment received during and immediately after the Draft EIR public review period pertaining to CEQA or the adequacy of the EIR, grouped by Draft EIR environmental topic heading, including comments received at the June 26, 2008 Planning Commission Meeting, July 1, 2008 Redevelopment Commission Meeting, and in writing. Each summarized comment is listed under the appropriate DEIR environmental topic heading in the order in which it was received, followed by the EIR authors' written response to the comment. Where warranted, some responses include reference to revisions to the Draft

EIR which have been included in section 3 (Revisions to the Draft EIR) of this document in response to the comment.

2.2.1 Project Description

LR 3.01 (Brisbane) Project Description--section 3.2.1, Regional and Local Setting--clarifications/revisions to DEIR language regarding regional access requested.

Response: Comment acknowledged. Section 3.2.1, Regional and Local Setting (DEIR page 3-2), has been revised to add this information and to be consistent with the description of project area regional access in section 8.1.1(a), Regional Access, in the DEIR Transportation chapter (DEIR page 8-2).

LR 3.02 (Brisbane) Project Description--Brisbane/Zone 1 edge conditions--section 3.1.3, Intended Uses of EIR--DEIR intended to function as project EIR for Zone 1 development, but draft Design for Development lacks detail regarding Zone 1/Brisbane edge condition, esp. pertaining to grading, circulation, utilities, and surface drainage. Brisbane expects that subsequent discretionary review and related environmental documentation for the Design for Development will address this interface in further detail and make such information available to Brisbane. If this DEIR represents only opportunity for Brisbane to comment, this additional edge condition information should be provided prior to certification of FEIR.

Response: This DEIR does not represent the only opportunity for the City of Brisbane to comment regarding interjurisdictional issues pertaining to the interface between project Redevelopment Zone 1 (Zone 1) and the adjacent City of Brisbane "Baylands" area.

As noted in this comment, the DEIR is intended to serve as a project EIR for Redevelopment Zone 1 (Zone 1) which is bounded on its southern edge by the county line and Brisbane city limit. The "Baylands" area of the City of Brisbane is immediately south of Zone 1. The DEIR examines the site-specific and cumulative impacts of the proposed Redevelopment Plan, Design for Development, and associated General Plan and Planning Code provisions for this portion of the Project Area. The degree of specificity included in the DEIR for these project components corresponds to the level of specificity known when the DEIR was prepared. In particular, the DEIR describes the proposed Redevelopment Plan and Design for Development development controls and design guidelines for the southern edge of Zone 1 to the extent known at the time the DEIR was prepared (DEIR pages 3-21 through 3-27), including the proposed residential, mixed-use (residential-retail), and park land uses proposed on the southern edge and associated building form and building height characteristics, conceptual provisions for open space, public and semi-public uses, street layout, and other common improvement requirements to be imposed on future development, and other anticipated standards and procedures for development which apply to the southern edge. These project aspects are described and illustrated to the extent known when the DEIR was prepared on DEIR pages 3-14 through 3-

27. Associated General Plan land designation and Planning Code designation changes are described and illustrated to the extent known when the DEIR was prepared on DEIR pages 3-27 through 3-35. Associated growth assumptions for Zone 1 are described to the extent known when the DEIR was prepared on DEIR pages 3-35 through 3-37.

The DEIR has been circulated to the City of Brisbane for review and comment. Development planning for Zone 1 remains conceptual. More detailed site planning, infrastructure and other development specifications have not yet been formulated. As future development plans (applications) are received and reviewed for these areas, the City intends to properly notify and consult with City of Brisbane staff, including the City's planning and engineering staff. The City anticipates a similar interjurisdictional coordination effort by Brisbane staff as Baylands planning and development details evolve.

The Redevelopment Agency Commission has specifically advocated such interjurisdictional coordination. Since this comment was submitted, Redevelopment Agency planning staff has met with City of Brisbane planning staff to discuss the Visitacion Valley/Baylands planning coordination process.

LR 6.01 (Morine) Project Description--need for consistent terminology--in section 3.6.8, terms "the village center" and "central shopping area," both referring to the same area are inconsistent; suggest using term "Leland/Bayshore Shopping District"

Response: In DEIR section 3.6.8, the terms "the village center" and "central shopping area" on pages 3-19 and 3-20, respectively, are direct quotes from the January 2008 Preliminary Report. In response to this comment, both terms have been revised in the DEIR to read "central shopping district." See these revisions to DEIR pages 3-19 and 3-20 in section 3 herein, Revisions to the Draft EIR. Similar revisions have been made to the Report to the Board on the Visitacion Valley Redevelopment Plan Adoption (see DEIR page 3-40 for a description of this document).

LR 6.02 (Morine) Project Description--parks--number of parks should not be mandated at three--referring to DEIR page 3-21, *Public Open Space*, first bullet; and feasibility of building a park above the Caltrain tunnel has not been verified

Response: The number of parks indicated for assistance on page 3-21 is directly quoted from the City/Agency-prepared January 2008 Preliminary Report and January 2008 Design for Development. The DEIR project description narrative on this page 3-21 is simply reiterating what these two documents specifically propose. These comments regarding project area park provisions will be considered by the Redevelopment Agency and Planning Department as the proposed Redevelopment Plan and Design for Development are finalized.

LR 6.03 (Morine) Project Description--Figure 3.6--Beatty Road mislabeled?

Response: Comment acknowledged. The map on Figure 3.6 is directly reproduced from the January 2008 draft Design for Development. The

"Beatty Rd" label has been eliminated in the final version of the Design for Development in response to this comment. A revised version of DEIR Figure 3.6 (DEIR page 3-22) with this correction is included in section 3 herein, Revisions to the Draft EIR.

LR 6.04 (Morine) Project Description--Figure 3.8--contrary to what figure indicates, railroad ROW has no height restriction.

Response: Comment acknowledged. Figure 3.7 has been revised in response to this comment to indicate no height restriction on the railroad right-of-way.

LR 6.05 (Morine) Project Description/Transportation and Circulation--Figure 3.12--what are parking ratios for Residential Transit Oriented (RTO) district (might be addressed in another document)?

Response: For residential developments in RTO districts, parking up to three cars for each four dwelling units is permitted. Parking up to one car for each dwelling unit may be provided as a conditional use, but parking above one car for each dwelling unit is not permitted (see Section 151.1 of the *San Francisco Planning Code*).

As indicated in section 3.9.2(a) on DEIR page 3-34, the newly-formed RTO district would have "a reduced parking requirement in recognition of transit proximity." In Zone 1, the Design for Development will establish site-specific development controls, including parking requirements. As indicated in DEIR section 8.3.9 on DEIR page 8-67, the Design for Development proposes that "all added residential units within the Project Area would be allowed to provide up to one off-street parking space for each unit." In addition, on-street parking spaces would be provided throughout Zone 1. No minimum parking requirement is proposed.

LR 6.06 (Morine) Project Description--library characteristics--fifth bullet on DEIR page 3-38: library site is 10,000 square feet and library building is 8,700 square feet (see comment 6.11.

Response: The Redevelopment Plan and Design for Development intentionally indicate a conservatively high estimated size for the planned new branch library of 10,000 square feet. More recent design program information indicates that the final design floor area will be 8,500 to 8,700 square feet as the commenter indicates. This 1,300-1,500 square-foot floor area difference does not substantively affect any of the DEIR impact or mitigation conclusions pertaining to library services (DEIR section 14.5.4, Increased Demand for Library Services).

LR 8.07 (Martin) Project Description--"Public Open Space" section on DEIR page 3-21--edit suggested: current statement "Facilitate community efforts to extend the Leland-McLaren Park greenway through the Concept Plan Sub-area (Zone 1) to the Caltrain Station" <u>should read</u> "Facilitate the Visitacion Valley Greenway Project's efforts to extend the Visitacion Valley Greenway from Leland-McLaren Park through the Concept Plan Sub-area (Zone 1) to the Caltrain station."

Response: The "Public Open Space" language cited in this comment on DEIR page 3-21 was correctly quoted from Table VI-4 on page VI-10 of the January 9, 2008 Visitacion Valley Redevelopment Plan Adoption Preliminary Report. The language revisions suggested in this comment have been incorporated by the Redevelopment Agency and City in finalizing the Redevelopment Plan documents and the Design for Development. See corresponding revision to DEIR page 3-21 in section 3 (Revisions to the Draft EIR) which incorporates this suggested change.

2.2.2 Project Consistency with Local and Regional Plans

LR 11.06 (Caltrans)

Project Consistency with Local and Regional Plans/Transportation and Circulation--General Plan Transportation Element--UPR's 2003 General Plan Guidelines recommend estimating the cost of needed improvements as well as identifying viable funding sources correlated to the pace of improvements. However, DEIR does not refer to any General Plan policies requiring developers to offset their impacts to the transportation system by paying traffic impact fees or constructing required improvements. Policies requiring mitigation of project-related traffic impacts should be included in DEIR section 4.1.5, Transportation Element.

Response: DEIR section 4.1.5, Transportation Element, includes all San Francisco-adopted General Plan transportation policies pertinent to consideration of the physical impacts of the project.

In DEIR chapter 8, Transportation and Circulation, section 8.25, Visitacion Valley Community Facilities and Infrastructure Fee and Fund, describes how City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to future residential development in Project Area Zone 1 and at the nearby Executive Park development to mitigate impacts on public infrastructure in Visitacion Valley. In addition, as part of the Redevelopment Agency/Planning Department proposed Design for Development implementation program, the Agency intends to, as a condition of future development approvals in Zone 1, enter into Owner Participation Agreements (OPAs) with developers that, among other fair share infrastructure mitigation implementation requirements, will establish developer local transportation system improvement requirements, some of which may be "in kind" developer roadway, transit and pedestrian/bicycle system improvements, and some which may involve fair share developer contributions to broader local and regional transportation system improvement needs. It is the Agency's intent that all transportation-related fair share developer contribution needs identified in this EIR will be incorporated into the OPA(s).

In addition, following standard San Francisco Department of Public Works (DPW) practice, the final Design for Development will include implementation provisions which require as a condition of subdivision map approval(s) establishment of a Public Improvements Agreement (PIA) between the

developer and the DPW which will include infrastructure bonding amount specifics to be computed by the DPW.

The task of formulating an interjurisdictional transportation improvement prioritization and funding plan for all of the developing areas on both sides of the San Francisco/San Mateo County line, including the Bayview Hunters Point and Candlestick development programs, India Basin Shoreline/Area C Redevelopment program, Executive Park Neighborhood Plan, Visitacion Valley Redevelopment Program, and Brisbane Baylands Specific Plan and Daly City Cow Palace site development plan, goes well beyond the reasonable scope of an individual 30-acre, Visitacion Valley Redevelopment Program EIR. In recognition of the broader, interjurisdictional nature of future transportation needs and planning approaches for this area, the San Francisco County Transportation Authority (SFCTA) in partnership with several jurisdictions and agencies from both sides of San Francisco/San Mateo County line,[1] including the City of Brisbane, the San Francisco Planning Department, the San Francisco Redevelopment Agency, San Francisco MTA, the San Mateo County Transportation Authority and Caltrans, is now undertaking *The Bi-County Transportation Study,* a high-level interjurisdictional transportation improvement planning, prioritizing, and funding effort. The specific intent of the effort is to create a financing plan for the area's highest-priority transportation improvement needs, including contributions from federal, state, regional, local and private sector sources. *The Bi-County Transportation Study* is specifically intended to develop an implementation plan, including priorities, schedule, designs, public/private funding and implementation strategy to provide for the transportation improvements needed to accommodate these anticipated cumulative developments. The stated objectives of the study are to:

- identify a multimodal package of transportation improvements that address identified cumulative and local needs,
- develop cost estimates for top-priority major transportation infrastructure projects, needed transit services, and local circulation and access projects, and
- establish a funding and implementation strategy for these projects that considers appropriate level of contributions from public and private sources.

Specific identified region-serving transportation improvement needs to be considered in the study include the Bayshore Intermodal Station and station area, Caltrain Oakdale station, Bayview transportation improvements, Geneva Avenue extension project, Harney Way re-build project, Muni Third

[1]The full list of participants includes CCAG of San Mateo County, the San Francisco Mayor's Office of Economic and Workforce Development, City of Brisbane, City of Daly City, San Francisco Planning Department, San Francisco Redevelopment Agency, San Francisco Municipal Transportation Agency, San Francisco Department of Public Works, San Mateo County Transportation Authority, San Mateo County Transit District (SamTrans), Peninsula Corridor Joint Powers Authority (Caltrain) and Caltrans.

Street Light Rail line and Bus Rapid Transit line connections to the Bayshore station, the Geneva-Candlestick U.S. 101 interchange re-configuration, pedestrian and bicycle connectivity at the Bayshore station, Caltrain service plans and bus feeder service needs in the Brisbane Baylands and Visitacion Valley areas, and Transportation Demand Management efforts and policies for the area.

The cumulative transportation impact mitigation needs identified in the Visitacion Valley Redevelopment Program EIR, and anticipated future EIRs for the Executive Park Neighborhood Plan, Brisbane Baylands Specific Plan, Candlestick Point development, India Basin Shoreline Project, Hunters Point Shipyard Phase 2 Project,[1] and Daly City Cow Palace site development project, will also be considered in formulating the Bi-County Transportation Study recommendations.

In addition to this interjurisdictional programming and funding effort, the City and County of San Francisco is currently using State Proposition C funds[2] for transit planning activity in the Bayshore intermodal transit station vicinity, including Muni T light rail, Muni BRT, SamTrans transit service improvements, and new facilities for pedestrian and bicycle access to the intermodal station.

Also, the City of Brisbane has completed and submitted a Project Study Report (PSR)[3] to Caltrans for the proposed extension, widening and realignment of Geneva Avenue in Brisbane; and in a coordinated effort with the San Francisco DPW, has also submitted a PSR to Caltrans for construction of the Geneva/Harney Way/U.S. 101 interchange, with three alternative approaches (alignments and configurations) for the Geneva/ Harvey interchange also described, including an alignment underneath U.S. 101, and an overpass interchange component in both cloverleaf and diamond interchange configurations.

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[1]The Candlestick Point, India Basin Shoreline and Hunters Point Shipyard Phase 2 Project are listed and discussed in the DEIR as three separate projects (see DEIR Table 5.1) but are being treated by the Planning Department and Redevelopment Agency as one "project" ("the Bayview Waterfront Project") for CEQA purposes and are currently being address on one Bayview Waterfront Project EIR. An NOP for the Bayview Waterfront Project EIR was released by the Planning Department and Redevelopment Agency on August 31, 2007.

[2]Under Proposition C, a percentage of sales tax collected in the jurisdiction is returned from the State for transportation-related programs and projects, including street rehabilitation and reconstruction, congestion management and planning, transit improvements, etc.

[3]A Project Study Report, defining and justifying a proposed regional transportation improvement project's scope, cost and schedule, is required before a project may be included in the State Transportation Improvement Program (STIP).

2.2.3 Land Use

RC 3.04 (da Costa) Land Use--compatibility of homes with rail yard and rail tracks--if we build homes next to a rail yard and next to trains passing, we need to address that.

Response: The EIR authors agree that the issue of compatibility between Visitacion Valley Redevelopment Program-facilitated new housing development in Zone 1 and existing and future rail activity along the multi-track Caltrain/Union Pacific railroad system that traverses the eastern edge of the Project Area is an important environmental concern. The potential for noise and groundborne vibration impacts of projected future increases to rail movements along this system on planned residential development in Zone 1 is addressed in DEIR chapter 13, Noise. In particular, the issue is addressed on DEIR pages 13-4 (sections 13.1.3, Existing Noise Environment, and 13.1.4, Noise Monitoring Results), 13-5 (long-term measurement location results for location LT-1, and subsection (b), Existing Caltrain Noise), 13-7 (Figure 13-2, Hourly Trends in Noise Levels at Location LT-1), 13-10 (Table 13.3, Summary of Long-Term and Short-Term Noise Measurements), 13-21 (Impact and Mitigation 13-2 for project-facilitated groundborne vibration impacts) and 13-22 and 13-23 (Impact and Mitigation 13-2: potential exposure of new, project-facilitated noise-sensitive developments to ambient noise levels exceeding standards).

LR 1.09 (DTSC) Land Use and Planning--contaminated property--DTSC suggests that DEIR include discussion of possible land use covenant that may be applied to a contaminated property in the event cleanup to residential standards is not possible and remediation activity results in the need for continued remediation action and controls; this would include DTSC determination that specific land uses are prohibited and land disturbance cannot occur without prior DTSC notification.

Response: Establishment of such a land use covenant in the event that clean-up to residential standards is not possible and continued remediation activity must be provided for is inherent in the impact statement 11-21 in DEIR chapter 11, Hazards and Hazardous Materials, for "Potential Impacts Due to Exposure to Existing Soil or Groundwater Contamination--Redevelopment Zone 1," which states:

"Implementation of future Project-facilitated development plans for Redevelopment Zone 1 would be dependent upon their clean-up according to DTSC protocols. Project-facilitated development activity within Zone 1 cannot proceed until required remediation actions previously described in subsection 11.1.2 herein have been completed to DTSC satisfaction.

Regarding the status of ongoing Zone 1 remediation program, the description in section 11.1.2, Historical Uses and Ongoing and Future Remediation Activities in Redevelopment Zone 1, on page 11-1 through 11-11 of the DEIR Hazards and Hazardous Materials chapter is adequate under CEQA in that it accurately represents the existing setting at the time the environmental analysis commenced (pursuant to CEQA Guidelines section 15125(a)). In response to this and similar comments regarding the latest status of the Zone

1 remediation program, Appendix 5.4 of this Final EIR, Remediation Status Update for Redevelopment Zone 1, includes the latest documentation (as of October 15, 2008) on the remediation program for the Redevelopment Zone 1 properties. Appendix 5.4 includes two components: (1) a September 2008 "Summary of Environmental Conditions and Planned Remediation of the Former Schlage Lock and Universal Paragon Corporation (UPC) Properties" prepared for the San Francisco Redevelopment Agency by Brownfield Partners, LLC; and (2) a September 8, 2008 memorandum to the San Francisco Redevelopment Agency from the Universal Paragon Corporation (UPC) describing the results of a legal settlement between UPC and the Ingersoll Rand Company regarding responsibility for remaining remediation needs.

In summary, the two documents: (1) explain that a May 28, 2008 legal settlement has transferred ownership of the 12-acre former Schlage property from Ingersoll Rand to UPC and transferred remediation and environmental liability for the project to Brownfield Partners, remediation/technical contractors, who will undertake the regulatory administration and insurance negotiation process obligation for the remediation effort; and (2) outline the Brownfield Partners-planned remaining remediation activities for the UPC property and an adjacent portion of the former Southern Pacific (SP) Brisbane Rail Yard property, including the latest proposed remediation schedule, proposed remediation approach. The description indicates that the remediation approach includes demolition of the existing buildings, evaluation of the effectiveness of the existing soil vapor extraction and treatment system, further characterization of key areas of the site, preparation and submittal of a remediation Feasibility Study, Combined Remediation Action Plan (RAP) and other remediation documents for DTSC approval; obtaining approval for and implementing the soil and groundwater remediation approach, and performing operation, maintenance and monitoring (O&M) activities as necessary following implementation of active remediation. Presumedly, if the DTSC ultimately requires a land use covenant similar to what is suggested in this comment, the approved remediation program would provide for such a covenant.

LR 6.07 (Morine) Land Use--Figure 5.1 (Substantive Development Sites in Project Vicinity)--consider adding Sunnydale/Hope SF proposal to map.

Response: As stated on DEIR page 5-3, paragraph 5, CEQA Guidelines section 15130 (Discussion of Cumulative Impacts) authorizes the lead agency to limit cumulative analysis of probable future projects to those which are planned or have an application made at the time the NOP is released. Accordingly, Table 5.1 lists recently approved and pending substantive development projects in the southeast area of the City shortly after the NOP release date for this EIR (the NOP was released on January 13, 2007). The Sunnydale/Hope SF development prospect did not meet this listing criteria; the development prospect is not a recently approved or pending project (no application has been submitted) and information on the prospect is speculative and insufficient for its consideration as a foreseeable project under CEQA. The San Francisco Housing Agency in partnership with the San Francisco Mayor's Office of Housing issued a Request for Qualifications

(RFQ) and has selected a development team for this site. It is generally understood that the current goal is to replace existing with new housing on-site at a one-to-one ratio with additional market rate and affordable units.

2.2.4 Population and Housing

RC 3.02 (da Costa)

Population and Housing--cumulative impacts of anticipated southeast area development--Draft EIR is missing general data, empirical data linked to the Housing Element; missing is a thorough analysis of cumulative population in the Schlage Lock area--impacted not only by Schlage Lock development activities but also by the operations of Santa Fe, which is not very far from here.

Response: The Draft EIR includes chapter 6, Population and Housing, that addresses the anticipated impacts of the proposed redevelopment program on population and housing characteristics in the Project Area and greater San Francisco (especially DEIR pages 6-13 through 6-17). The scope of the EIR, including the Population and Housing chapter, has been dictated by CEQA and the CEQA Guidelines. Under CEQA, project issues related to population and housing are not considered impacts on the environment unless they result in adverse physical environmental effects.[1] The physical changes needed in the San Francisco southeast area vicinity to accommodate project and project-plus-cumulative growth and their potential environmental impacts are fully addressed throughout the DEIR under such environmental topic headings as transportation and circulation (chapter 8, and see response to comment LR 11.10), air quality (chapter 9), noise (chapter 13), public services (chapter 14) and utilities and service systems (chapter 15).

Additional, more detailed information on Project Area housing and demographic data is included in the Report to the Board on Visitacion Valley Redevelopment Plan Adoption prepared for the Agency by Seifel Consulting and available for review at the offices of the San Francisco Redevelopment Agency, 1 South Van Ness Avenue, Fifth Floor, San Francisco, CA 94103; contact: Tom Evans, phone: 415-749-2539.

LR 6.08 (Morine)

Population and Housing--project area population and housing--Visitacion Valley median household income--in DEIR section 6.1.3, stated Visitacion Valley median household income is incorrect; explain how this number was determined based on 2000 Census; actual number is closer to citywide median.

Response: The median income information in DEIR section 6.1.3 has been removed from the document since it has no relevance to a physical

[1] CEQA Guidelines section 15064(e) notes that an economic or social change by itself would not be considered a significant effect on the environment. The population changes that would occur with implementation of the Project, and the effect of those changes in contributing to cumulative population growth in the San Francisco southeast area and vicinity, are not adverse environmental (physical) impacts in themselves.

environmental effect. CEQA Guidelines section 15064(e) notes that an economic or social factor by itself would not be considered an environmental effect.

Median income and other demographic information on the Project Area are described in chapter XVI of the Report to the Board on Visitacion Valley Redevelopment Plan Adoption prepared for the Redevelopment Agency by Seifel Consulting, and available for review at the offices of the San Francisco Redevelopment Agency, 1 South Van Ness Avenue, Fifth Floor, San Francisco, CA 94103, contact: Tom Evans, Lead Planner (telephone 415-749-2539).

LR 6.09 (Morine) Population and Housing--project area population and housing--housing density; Visitacion Valley has significantly higher average household density than indicated in DEIR section 6.1.3; if these figures are used to project future population trends, this would result in a higher figure than the 6,000 population figure presented in this document (Table 6.4). Will this increase the need for public services?

Response: The Project Area population density figure described in section 6.1.3 is for the existing setting. Population based impact findings in the DEIR were based on the projected "with project" household size average described in DEIR section 6.3.3, Impacts and Mitigation Measures. As explained by the DEIR Table 6.3 footnotes (DEIR page 6-6), the estimates in Table 6.3 of projected population with the project, which were used in DEIR chapters 14, Public Services, and 15, Utilities and Service Systems, to evaluate project impacts, assume an average household size in the Project Area of 3.72 persons in 2025, as suggested by the Redevelopment Agency and Planning Department for new units constructed in the Project Area between now and 2025. The 3.72 persons per household figure estimate is intentionally high, based on the "family" housing emphasis of the proposed redevelopment program and may result in conservative over-estimates in the DEIR of project population-related environmental effects.

2.2.5 Visual Factors

PC 1.03 (Martin) Visual Factors--design review--hope that community will have design review input throughout the process "until the last nail is driven in."

Response: The specific development controls and design guidelines in the Design for Development will be subject to additional community review through the Visitacion Valley Citizens Advisory Committee (CAC) review process as they are finalized. In addition, future individual development applications in the Project Area will be subject to a specific design review procedure which has been included as Appendix F of the latest version of the *Visitacion Valley/Schlage Lock Design for Development* document. In summary, all new development proposals in Zone 1 will undergo design review and approval by the Agency prior to issuance of building permits. This review will assure compliance with the requirements of the Redevelopment Plan, the Design for Development, and applicable sections of the Planning

Code. The Agency and the Planning Department will work cooperatively to review all development proposed in the Project Area and ensure that all proposals comply with the Redevelopment Plan, the *Design for Development* and the Planning Code. The Agency and Planning Department will facilitate community review of proposals prior to their final approval. The Agency will delegate to the Planning Department responsibility for administering the Planning Code in Zone 2 of the Project Area.

The *Design for Development* Appendix F stipulated design review process will allow city staff and community members to evaluate the quality and appropriateness of each development proposal on the basis of the design objectives, development standards and urban design guidelines stated in the *Design for Development.* This review will serve to coordinate individual design efforts and realize the best possibilities inherent in each project while increasing the overall visual harmony and enhancing the broad physical planning objectives of the project site.

A broad outline of the design review process is now described in Appendix F of the *Design for Development.* The process will include a Design Review and Document Approval Procedure (DRDAP) agreement to be established between the Project Sponsor and the Agency detailing clear design review procedures, including timelines for review and applicant submission requirements.

The design review process will be conducted cooperatively by the Agency and the Planning Department. At the discretion of the Agency, a qualified independent individual or review panel may be selected to make design evaluations and recommendations to the Agency and Planning Department. The Agency will be responsible for the design review process and maintaining liaison with the developer's architectural design team, and formal required submissions will be made to the Agency.

Designs for new development will be reviewed by an inter-agency project review team. This review will occur before critical decisions in the design process are made and will include review of Major Phase plans, Schematic Design plans, Design Development plans, and final construction plans and specifications. It is expected that continuous contact will be maintained between the developer's architect and the City's design review staff during the draft design and working drawing process.

Advice and consultation regarding proposed developments will also be sought by Agency staff from the Visitacion Valley CAC. All Major Phase and Schematic design approvals will be made by the Redevelopment Commission at a public hearing after review by the Visitacion Valley CAC and Planning Department.

RC 10.02 (Commission President Covington)

Visual Factors--visual simulations--are all depictions worst case scenarios?

Response: Yes, the simulations are intended to depict the maximum building envelopes permitted by the proposed Design for Development development controls and design guidelines. As stated on DEIR page 7-9:

"The simulations indicate the location, scale, and massing of possible Project Area buildings based on the urban design framework, building form recommendations and DCDG's described in the Design for Development. The simulations have been prepared using objective computer modeling techniques. The images are accurate within the constraints of available site and Design for Development information. The level of architectural detail that is depicted is minimal, however, and is not intended to reflect the specific architectural forms, materials, or detailing of future, as yet undesigned, individual development projects facilitated by the proposed Redevelopment Plan and Design for Development."

LR 4.01 (LPAB) Visual Factors--Schlage Lock design criteria--Landmarks Preservation Advisory Board (LPAB) suggests including the design guideline criteria developed for the Schlage Lock site as a mitigation in the EIR.

Response: The development controls and design criteria included in the Redevelopment Plan and Design for Development are included in the EIR as part of the "Project," and would go into effect upon City/Agency adoption of the Redevelopment Plan and Design for Development. Also, the additional mitigation needs identified in the DEIR by the EIR authors to address identified potentials for significant aesthetic and cultural and historic resource impacts have been incorporated into the latest version of the Design for Development.

LR 6.10 (Morine) Visual Factors--Mitigation 7-1 (Building Scale Compatibility impacts)--(mitigation calls for adding additional building bulk and/or building articulation controls to D4D)--where in D4D will this be addressed?

Response: After certification of the EIR, many of the EIR-identified mitigations, including Mitigation 7-1, will be implemented by incorporating them into the project (i.e., the Design for Development) as stipulated conditions of approving the project, pursuant to CEQA Guidelines section 15126.4(a)(2) which states that "In the case of the adoption of a plan, ...mitigation measures can be incorporated into the plan...."

LR 8.02 (Martin) Transportation and Circulation/Visual Factors--alternative grocery store locations--there have been discussions about situating grocery store on corner of Leland Avenue and Bayshore Boulevard in Zone 1, instead of historically preferred southern site at Sunnydale Ave.; would be beneficial to analyze traffic implications of these two possible grocery store location alternatives in terms of traffic, queuing, parking and aesthetics, particularly at the entry to the new development and adjacent to the "Central Park" where effects might be problematic; would be beneficial to have traffic analysis of these two alternative locations to determine, at least in terms of traffic, the better location for the grocery store. Given anticipated congestion along Bayshore, would seem preferable to draw traffic away from most crowded intersections.

Response: As indicated on DEIR page 3-37, the DEIR growth projections for Zone 1 under the proposed Redevelopment Plan and Design for Development assume that "a new 50,000-square-foot grocery store with

housing above would be developed at the northeast corner of Bayshore Boulevard and Sunnydale Avenue.

The trip generation, origin/destination patterns, and modal split of the project's proposed grocery store would be minimally affected by its location within the development. Shifting the location of the grocery store to a location near the Central Park or closer to the intersection of Bayshore/Leland would result in grocery-related trips to utilize different project driveways. However, since this change would also necessitate a corresponding shift in location of other project elements (e.g., relocating additional residential units to the former grocery store site), the overall impact to project traffic volumes at the study intersections would be minimal.

From an aesthetic standpoint, location of the grocery store at either the northeast corner of Bayshore and Sunnydale or the southeast corner of Bayshore and Leland would not have a substantially different impact. Under the Design for Development, both locations would involve a mixed use[1] architectural configuration with retail on the ground floor and residential development above. The development controls and design guidelines included in the draft Design for Development would limit the visual impacts of a grocery store or any other retail use at either location to similar levels.

LR 11.27 (Caltrans) Visual Factors--nighttime light and glare impacts on US 101--due to the close proximity of the Project Area, what are the potential nighttime light and glare impacts on US 101?

Response: The potential nighttime light and glare impacts of Project Area (Redevelopment Area Zone 1) buildout on U.S. 101 would be less than significant. The Project Area (Zone 1) is not adjacent to the U.S. 101 freeway right-of-way, but rather is approximately one quarter to one third of a mile from the freeway (see DEIR Figure 3.1), and visually buffered from the freeway by intervening existing urbanization and hill topography, including the Little Hollywood residential neighborhood located north and east of the Project Area along Lathrop, Blanken and Hester Avenues immediately west of the freeway right-of-way. An intervening hill and solid waste facility (land fill) visually buffers the project site from the nearest segment of U.S. 101 (between the Bayshore and Harney Road-Beatty Lane interchanges). The surrounding Visitacion Valley/Little Hollywood communities are already heavily urbanized with a myriad of exterior lighting and nighttime illumination sources. The freeway segment of Bayshore Boulevard to the San Francisco-Oakland Bay Bridge traverses the more highly urbanized areas of central San Francisco northeast of the Project Area. Added nighttime illumination sources from buildout of Zone 1 under the provisions of the proposed Design for Development would not be more prominent in the freeway view than the myriad of existing intervening and surrounding light sources. The more substantive nighttime light and glare issues in the City's southeast area

[1]The Design for Development "Urban Concept Plan" (Figure I-6) designates "Mixed-Use Residential/ Retail" at both locations. The Design for Development "Development Controls" for land use state that "Residential use shall be permitted on upper stories throughout the plan area," and Design for Development Figure 2-2 (Retail Frontages) indicates that retail frontage is required at both locations.

include impacts from the freeway itself. Vehicles traveling along the freeway represent one of the most substantial sources of nighttime light and glare impacts in the City's southeast area with associated adverse effects on nighttime views.

2.2.6 Transportation and Circulation

PC 1.02 (Martin)

Transportation and Circulation--general concern about transportation issues--need for Geneva Extension--concern about one big thing that has to be done about the transportation issues raised by development at Schlage Lock: we need to have a Geneva Extension in order to relieve us of some of the traffic that is going to be caused; Planning Department should push for this for not only our neighborhood but also for Brisbane, Daly City, and the redevelopment happening at Candlestick.

Response: As discussed in the assessment of future 2025 Cumulative conditions, there are several future transportation infrastructure projects that would improve intersection operating conditions and help offset the anticipated increase in traffic volumes from the nearby major development projects. The proposed extension of Geneva Avenue between Bayshore Boulevard and the U.S. 101 interchange at Harney Way would help reduce traffic volumes on the local streets (like Tunnel Avenue) by providing a more direct route to and from the freeway. Currently, this extension and interchange project is included as part of the proposed development program for the Brisbane Baylands Specific Plan area. A separate environmental review and clearance procedure is underway by the City of Brisbane for both the specific plan program and the roadway extension. The Redevelopment Agency and Planning Department in conjunction with the Zone 1 development sponsors will work with the City of Brisbane in support of the new roadway, as appropriate. It should be noted, however, that this new facility would not be required specifically for the proposed Visitacion Valley Redevelopment Zone 1 development program, but would be needed to accommodate the overall development anticipated throughout the area.

PC 2.02 (Jackson)

Transportation and Circulation--general concern about transportation issues--need for Geneva Extension--cumulative impacts of anticipated southeast area development--transportation issues warrant focus, especially with regard to the Geneva Extension and how this project in combination with Executive Park, Candlestick Point, Bayview-Hunter's Point and the Bayside development area to the south in Brisbane are all going to have a lot of impact on transportation; planning activity should focus on this particular issue

Response: The 2025 Cumulative conditions scenario, as assessed in the DEIR transportation section, includes the anticipated development throughout the area, including the proposed Executive Park, Candlestick Point, India Basin Shoreline, Hunters Point Shipyard Phase 2, Brisbane Baylands Phases 1 and 2, and Daly City Cow Palace development projects, as discussed on pages 8-26 and 8-27 of the DEIR. Environmental review documents are also being or will be prepared for each of these projects to further address their

specific contributions to the cumulative impact of all of these potential developments. In addition, as indicated in response to comment LR 11.06 herein, there are several city-, county- and interjurisdictional assessment and planning efforts currently underway to address the long-term transportation and circulation improvement prioritization and funding for the developing areas on both sides of the San Francisco/San Mateo County line, including the ongoing Bi-County Transportation Study being led by the San Francisco County Transportation Authority (SFCTA) in partnership with the City of Brisbane, San Francisco Planning Department, San Francisco Redevelopment Agency, San Francisco MTA, San Mateo County Transportation Authority and Caltrans.

PC 3.01 (Commissioner Moore) Transportation and Circulation--general concern about transportation issues--comprehensive planning approach needed--strongly supports views expressed by commenters (PC 1 and PC 2) regarding the need for comprehensive transportation planning; planning for entire southeast area and overall eastern neighborhoods needs to be done "with on broad brush stroke"; development in these areas needs to be considered comprehensively.

Response: Each proposed development in the southeast San Francisco/ north Brisbane/west Daly City area has its own phasing and timeline. While it is logical to assume absolute consistency between projects in the cumulative analysis, given the time constraints present with each project and the constantly changing land use programs, ensuring complete EIR analysis consistency among all area projects would be difficult. Each project EIR analysis is being conducted consistent with the land use programs and other relevant information available at the time the associated NOP was published. In addition, the intent of the current Bi-County Transportation Study is to address the comprehensive transportation planning needs for the southeast area and vicinity described in this comment (see response to comments PC 4.01 above and LR 11.06 in section 2.2.2--Project Consistency with Local and Regional Plans--herein).

PC 4.01 (Commissioner Miguel) Transportation and Circulation--need for Geneva Extension--need to clarify transportation impacts and mitigations--involved City departments should work together on this; looking toward the point when this project comes back to Commission with the transportation element thoroughly flushed out.

Response: Comment noted. Efforts to study and evaluate the potential extension of Geneva Avenue between Bayshore Boulevard and U.S. 101 are currently underway, including the Brisbane Baylands Specific Plan and EIR program and the interjurisdictional Bi-County Transportation Study (see responses to comments PC 4.01 above and LR 11.06 in section 2.2.2--Project Consistency with Local and Regional Plans--herein). In particular, the Bi-County Transportation Study is addressing the need for interjurisdictional transportation improvement prioritization and funding, and the combined effects of the local and regional projects proposed in the area. Staff from various departments and agencies within the City and County of San Francisco, the City of Brisbane, County of San Mateo and Caltrans have been substantially involved in this effort, and will continue their involvement

through the remainder of the Bi-County Transportation Study and design process.

PC 6.01 (Commissioner Antonini) Transportation and Circulation--need for Geneva Extension--how does the Geneva Extension issue relate to this project--are the two going to be done simultaneously; has staff been working with the City of Brisbane on this?

Response: The City of Brisbane is the lead agency for the potential Geneva Avenue Extension and the associated Baylands Specific Plan Phase 1 and 2 project. The City of Brisbane has completed and submitted a Project Study Report (PSR)[1] to Caltrans for the proposed extension, widening and realignment of Geneva Avenue in Brisbane; and in a coordinated effort with the San Francisco DPW, has also submitted a PSR to Caltrans for construction of the Geneva/Harney Way/U.S. 101 interchange, with three alternative approaches (alignments and configurations) for the Geneva/ Harvey interchange described, including an alignment underneath U.S. 101, and an overpass interchange component in both cloverleaf and diamond interchange configurations. These are completely separate projects from the proposed Visitacion Valley Redevelopment project, for which the San Francisco Planning Department and San Francisco Redevelopment Agency are co-lead agencies. The extension of Geneva Avenue would help improve vehicular circulation throughout the area. Its analysis/approval/ construction process is not connected exclusively to the proposed Visitacion Valley redevelopment program, but rather is linked to all of the numerous development projects currently being considered in the area, including the Brisbane Baylands Specific Plan formulation program as well as the Executive Park, Bayview Waterfront (Candlestick Point, India Basin Shoreline, Hunters Point Shipyard Phase 2), and Daly City Cow Palace development projects. The City and County of San Francisco has been working in coordination with the City of Brisbane, San Mateo County and Caltrans throughout its planning and development review process for those projects located in San Francisco and will continue to work together with these agencies, as appropriate.

RC 1.02 (Morine) Transportation and Circulation--need to clarify transportation impacts and mitigations--EIR indicates that traffic will be basically almost gridlock at certain hours of the day--there are several pages on mitigation and several mitigation pieces, but no maps of how mitigations are going to be addressed exactly--maybe maps of proposed new intersections and interchanges would help.

Response: A map of the anticipated roadway network improvements in 2025 is illustrated in Figure 8.4 of the Draft EIR (DEIR page 8-46).

RC 2.01 (Jackson) Transportation and Circulation--cumulative development impacts--comprehensive planning approach needed--concern regarding fact that there are a lot of plans being made in the area: Bayview-Hunters' Point, South Bayshore Plan, Visitacion Valley, Brisbane, etc., that raise concerns about

[1] A Project Study Report, defining and justifying a proposed regional transportation improvement project's scope, cost and schedule, is required before a project may be included in the State Transportation Improvement Program (STIP).

traffic matters; specific concern regarding traffic from Bayshore through Bayview-Hunters' Point (3rd Street).

Response: Given the location of the project south of the U.S. 101 interchange at Bayshore Boulevard/Third Street, only a small portion of project-generated trips are expected to use Third Street north of the interchange. Most inter- and intraregional through trips would make use of U.S. 101, which offers more convenient access to downtown San Francisco and other important regional points. In addition, trips traveling between the Project, Executive Park and the Bayview Waterfront Project (Candlestick, Hunters Point Shipyard and India Basin) could be served from Harney Way and Hunters Point Expressway and the new access roadways to be provided as part of those developments.

RC 6.01 (Commissioner Swig)

Transportation and Circulation--need to clarify transportation impacts and mitigations--traffic piece confusing and in need of clarification; makes it sound like Manhattan at its worst rush hour disaster; there should be more clarification; hard time envisioning the massive gridlock that is reflective in the EIR; needs to be some clarification on this.

Response: In response to this and similar comments regarding the need to provide a clear summary of the various DEIR-identified transportation network mitigation needs for the three analysis scenarios--Existing Plus Project, 2025 Cumulative Plus Project, and 2025 Cumulative Plus Project with Planned Regional Transportation Improvements, a summary chart entitled "Visitacion Valley Redevelopment Program--Roadway System Impacts and Mitigation Summary" has been formulated and included in Appendix 4.5 (Supplemental Transportation Analysis Information) herein. The chart lists each study intersection, freeway segment and freeway ramp addressed in the DEIR traffic analysis, and summarizes associated impact and mitigation findings for each of the three analysis scenarios.

With regard to the various roadway system operational impact findings, "massive gridlock" is not projected; rather, the analysis concludes that under the Existing Plus Project scenario without mitigation, peak hour operational ("level of service" or LOS) conditions--i.e., the average delay per vehicle--at five intersections along Bayshore Boulevard--Bayshore/Blanken, Bayshore/Arleta/San Bruno, Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnydale--could potentially be increased in the AM peak hour from current durations of between 12 and 31 seconds per intersection to durations greater than 50 to 80 seconds--i.e., increases in delay of greater than 40 to 65 seconds at each of these five intersections.

Peak-hour operational (LOS) conditions under the Existing Plus Project scenario in the PM peak hour without mitigation would also be reduced due to the Project, with the Project creating a potentially significant increase in peak hour delays at two intersections--Bayshore/Arleta/San Bruno and Bayshore/Leland, from current durations of between approximately 25 and 28 seconds to durations greater than 80 seconds--i.e., increases in delay of greater than 22 to 25 seconds at each of these two intersections. Implementation of DEIR-recommended mitigations--individual development

Transportation Management Plans (TMPs) and elimination of the Project-proposed left-turn lane from southbound Bayshore into Zone 1 at Leland (Mitigations 8-1B and 8-1C) would reduce the degree of added delay, but not to less than significant levels.

The analysis also concludes that under the 2025 Cumulative with Project and Planned Regional Transportation Improvements scenario, peak hour operational (LOS) conditions would be similarly reduced due to the Project. The Project would contribute "significantly" to cumulative increases in AM peak hour operational (LOS) conditions at four intersections, including three intersections along Bayshore--Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnyvale--and the Tunnel/Blanken intersection. Without mitigation, AM peak hour delays at these intersections with or without the Project could increase to greater than 80 seconds at Leland and Sunnydale and to between 44 and 75 seconds at the other two intersections (current AM peak hour delays at these four intersections range form 12 and 31 seconds).

The Project would contribute "significantly" to cumulative increases in PM peak hour operation (LOS) conditions at two intersections, both along Bayshore--Bayshore/Arleta/San Bruno and Bayshore/Leland. Without mitigation, PM peak hour delays at these two intersections with or without the Project could increase to between 68 and 74 seconds (current PM peak hour delays at these two intersections are between approximately 25 and 28 seconds).

With implementation of the DEIR-proposed mitigations (signal timing and other design modifications, including possible through- and turning-lane restriping), the Project contribution to these projected cumulative future AM and PM peak hour delays could be reduced to a less-than-significant level; however, because these intersection design changes could have adverse effects on Muni transit operations and truck movements along Bayshore and would impact bike routes and pedestrian movements, they will need to be further explored. In this light, the DEIR has described the Project contribution to these projected future peak hour intersection delays as significant and unavoidable.

LR 3.03 (Brisbane) Transportation and Circulation--intersection analysis--EIR should analyze LOS at Bayshore/Geneva intersection (a CMP intersection) and Tunnel/Beatty Road intersection.

Response: To address the question raised by this comment, a supplemental transportation analysis was conducted by the EIR transportation consultants, DMJM/AECOM, for the Bayshore/Geneva and Tunnel/Betty intersections under the Existing and Existing Plus Project scenario. The results of this analysis are summarized in the table below. The detailed level of service computation sheets completed to reach the conclusions below are included in Appendix 4.5, Supplemental Transportation Analysis Information, herein.

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		LOS	Delay	LOS	Delay
Existing Conditions					
Tunnel Avenue/ Beatty Road	OWSC[1]	A (wb)	9.8	B (wb)	11.0
Bayshore Boulevard/ Geneva Avenue	Signalized	C	23.4	C	27.2
Existing plus Project Conditions					
Tunnel Avenue/ Beatty Road	OWSC[1]	B (wb)	11.5	B (wb)	13.1
Bayshore Boulevard/ Geneva Avenue	Signalized	C	24.3	C	27.8

[1] OWSC = one-way stop controlled (stop sign); unsignalized.

As shown in the above table, both the intersection of Tunnel/Beatty and Bayshore/Geneva currently operate with acceptable conditions, and would continue to operate acceptably with the project.

However, as discussed in the DEIR, it is anticipated intersection operations would become significantly congested in the future, as a result of the substantial amount of new cumulative development proposed at Hunters Point, Executive Park, Bayview Waterfront (Candlestick Point, India Basin Shoreline, Hunters Point Shipyard), Brisbane Baylands, the Daly City Cow Palace site, and other projects throughout the area, in addition to the proposed Visitacion Valley redevelopment program.

To address these future cumulative operating conditions, major infrastructure improvements would be needed, such as the proposed extension of Geneva Avenue and the new U.S. 101 interchange, associated improvements to the Tunnel/Beatty and Bayshore/Geneva intersection as suggested in this comment, plus improvements to transit and other non-auto modes. As more fully explained in response to comment LR 11.06 herein, the required future changes necessary to these transportation network facilities, and associated priorities and "fair share" funding responsibilities, are currently being evaluated through the on-going, interjurisdictional Bi-County Transportation Study.

LR 3.04 (Brisbane) Transportation and Circulation--intersection analysis--EIR should analyze LOS at Bayshore/Guadalupe Canyon Parkway intersection and Bayshore/Old Country Road/Tunnel Avenue intersection.

Response: Given the location of the project site, only a small number of trips are expected to make use of Bayshore Boulevard south of Geneva Avenue. U.S. 101 provides more convenient access south of the county line via the ramps at Alana Way/Beatty Road or via the new Harney/Geneva interchange. In addition, as discussed in the response to comment LR 3.03, the project would only result in a minor change in delay (less than one second) at the

intersection of Bayshore/Geneva. As such, it is anticipated that the effect of the project on intersections further south (such as at Guadalupe Canyon and Old County Road) would be even less.

LR 3.05 (Brisbane) Transportation and Circulation--US 101 onramps--EIR should analyze most southern (Sierra Point Parkway at Lagoon Way) US 101 onramps

Response: It is not expected that a substantial number of project-generated trips would use the U.S. 101 southbound on-ramp at Sierra Point Parkway/ Lagoon Way, as the Alana/Beatty interchange is closer and has more-direct access. Overall, it was estimated that only about 15 percent of project-generated traffic would access U.S. 101 southbound to travel from the project site to points south. Due to its distance from the project site and the relatively low demand volumes, this on-ramp was not included as a study location.

LR 3.06 (Brisbane) Transportation and Circulation--intersection analysis--projected LOS F at Alana/Beatty and anticipated LOS F at Beatty/Tunnel intersection are not acceptable under City of Brisbane's General Plan (requires that LOS shall not be less than D) and require mitigation

Response: As discussed in response to comment LR 3.03 above, the intersection of Tunnel/Beatty is anticipated to operate at LOS D or better during the peak hours under the Existing and Existing Plus Project scenarios. It should be noted that under 2025 Cumulative conditions with the proposed extension of Geneva Avenue, this intersection would likely be eliminated (or its function reduced). A program for determining the overall future mitigation strategies, priorities and funding mechanisms for such cumulative transportation improvement needs in the area is currently being developed through the Bi-County Transportation Study process. All project-related and region-serving (cumulative) transportation improvement needs that are located in the City of Brisbane would be subject to review and approval by the City of Brisbane.

LR 3.07 (Brisbane) Transportation and Circulation--intersection analysis--Mitigation 8-4 (Alana Way/Beatty Ave. intersection)--add that required improvements shall be subject to City of Brisbane review.

Response: Comment noted. All project-related and region-serving transportation improvement needs that are located in the City of Brisbane would be subject to review and approval by the City.

LR 3.08 (Brisbane) Transportation and Circulation--onramp analysis--Mitigation 8-6 (US 101/Geneva Ave. onramp) does not explain basis of determining "fair share"--fair share should be consistent with jointly funded Bi-County Transportation Study ratios.

Response: The determination of future "fair share" contributions will be included as part of the project's conditions of approval, as dictated by the Redevelopment Agency and/or the Bi-County Transportation Study and related interjurisdictional funding programs. If the results of the ongoing Bi-County Transportation Study are available within the required timeframe for

future Zone 1 development approvals, the Redevelopment Agency may choose to utilize those numbers.

LR 3.09 (Brisbane) Transportation and Circulation--freeway segment operation--Mitigation 8-8 for 2005 cumulative impacts on freeway operation with planned regional improvements concludes that providing additional mainline capacity on this US 101 segment is infeasible; elaborate on basis for this conclusion; also, analyze whether investments in regional transit (e.g., added Bayshore Caltrain station service, including feeder service, or Balboa Park BART station shuttle service) would help alleviate segment capacity need.

Response: The freeway network in the vicinity of the project site (namely U.S. 101) is currently built-out, with insufficient right-of-way to expand the freeway for additional mainline capacity without requiring an extensive reconfiguration of several freeway overpass, underpass, and ramp structures. Furthermore, additional mainline capacity in the immediate vicinity of the project may not substantially improve traffic flow, as bottlenecks would occur to the north and south of the segment. Although it may be possible to provide auxiliary lanes between sets of on- and off-ramps, the effect of these auxiliary facilities would be limited to improving the ramp merges and would not increase mainline capacity.

It is likely that planned improvements to regional intermodal transit service (Muni T-Third light rail line, SamTrans, BART and Caltrain) would help to accommodate some of the future growth in travel demand along the corridor. This could be further achieved by improving vehicular, local transit, pedestrian and bicycle access to stations (such as the potential reconfiguration of the Caltrain Bayshore Station to provide a direct connection to the Muni T-Third light rail line, or improved feeder bus service to the Balboa Park BART station).

LR 3.10 (Brisbane) Transportation and Circulation--transit operational impacts--section 8.3.6, Impacts on Transit Service, includes no analysis of whether existing or planned Caltrain service at Bayshore station will be adequate to accommodate project-generated and/or cumulative transit demand--should be addressed--current service limited--ability to accommodate cumulative increase in transit demand without increased service (not currently funded) seems unlikely.

Response: As shown in Table 8.8 of the DEIR (DEIR page 8-29), the project is projected to generate 433 transit trips in the AM peak hour (140 inbound, 293 outbound) and 440 trips in the PM peak hour (255 inbound, 185 outbound). Given the project trip distribution estimates indicated in Table 8.10 of the DEIR (DEIR page 8-29), the project would generate 145 South Bay trips in the AM peak hour (47 inbound, 98 outbound) and 147 South Bay trips in the PM peak hour (85 inbound, 62 outbound). Due to the relatively infrequent Caltrain service planned at the adjacent Bayshore Station (one train an hour), it was estimated that the majority of these project transit trips would use BART, with a smaller percentage using SamTrans.

Recent Caltrain ridership data from 2007 indicates that there is substantial existing capacity on the trains stopping at Bayshore Station, mostly due to the fact that the trains are limited-stop trains, which have longer journey times compared to Baby Bullet service. The table below summarizes the maximum loads for AM peak period southbound and PM peak period northbound trains at Bayshore Station.

Train	Arrives / Departs Bayshore Station	Maximum Load	
		Passengers	Station
208	6:34 AM	169	San Carlos
218	7:34 AM	190	San Carlos
228	8:34 AM	122	Belmont
263	5:13 PM	143	San Mateo
271	6:13 PM	187	Belmont
281	7:13 PM	108	Hayward Park

Source: Caltrain, 2007.

Given that the trains have a capacity of approximately 650 passengers, the data above indicates that there is substantial excess capacity on existing trains at Bayshore Station to handle additional transit demand.

Some percentage of transit riders may choose to take Caltrain for San Francisco trips, but given the comparatively poor frequency, limited number of stop locations, and distance between the Fourth/King terminal and major activity centers in the greater downtown area (Financial District, Union Square, Civic Center, and Chinatown), this number is expected to continue to be fairly low under the potential extension to Transbay Terminal scenario.

In the future, the combined planned developments at Brisbane Baylands, Executive Park and Bayview Waterfront (Candlestick, Hunters Point Shipyard and India Basin), in addition to the proposed project, would increase the cumulative demand for transit service in the area. In particular, there is anticipated to be an increase in Caltrain ridership at the Bayshore Station, primarily in the reverse peak direction (from these developments to job centers on the Peninsula and in the South Bay). Caltrain has previously discussed providing additional service by electrifying the line and increasing the frequency of the trains that stop at the Bayshore Station (currently, only one of six trains stop). In addition, planned improvements to Muni transit service to the corridor (more stops and more frequent service, etc.) are expected to encourage increased ridership.

As part of the ongoing Bi-County Transportation Study, a more detailed review of the area-wide transit ridership and capacity is currently being conducted, and will include an assessment of area-wide conditions and recommendations to improve future transit capacity levels.

LR 3.11 (Brisbane)

Transportation and Circulation--pedestrian impacts--operation--D4D-proposed temporary pedestrian path to Caltrain station referenced in DEIR section 8.3.7, Pedestrian Impacts, should be clarified to indicate need for City of Brisbane review and approval if within Brisbane city limits as shown.

Response: Comment noted. All future pedestrian improvements that are located in the City of Brisbane would be subject to review and approval by the City.

LR 3.12 (Brisbane) Transportation and Circulation--bicycle impacts--section 8.3.8, Bicycle Impacts, appears to assume substantial mode shift to bicycle usage due partly to site convenience to designated Class II bike routes--lack of improvements to southern segments of these routes (e.g., Tunnel Ave. and Bayshore Blvd.) could impede bicycle usage--Cities should explore together interim bikeway improvements here (southerly of project site) to enhance bike connectivity and promote bike safety.

Response: As discussed in DEIR section 8.1.4, Bicycle Conditions, on DEIR page 8-17, there are several San Francisco bicycle routes in the vicinity of the project site, including bicycle lanes on Bayshore Boulevard, bicycle lanes on Tunnel Avenue, and bicycle routes on Alana Way, Harney Way, and Blanken Avenue. On typical weekdays, bicycle activity in the immediate area is light throughout the day, with bicyclists observed using the on-street bicycle facilities and other area-wide streets.

Based on the travel demand analysis conducted for the project, it was conservatively estimated that about 16 percent of the future trips would be by "other" modes that include walk, bicycling, taxi, and additional modes, a portion of which would be on bicycle for their primary modes.

In general, it is likely that most project bicycle trips would be destined to downtown (for work) or one of the nearby attractions within the greater Visitacion Valley and Bayview districts. Due to the relative paucity of bicycle attractions to points south (with the exception of the office developments at Sierra Point), it is anticipated that the current San Francisco bicycle facilities could accommodate these trips.

However, independent from this project, the City and County of San Francisco, the County of San Mateo, and the City of Brisbane should collaboratively explore means to improve bicycle facilities and access throughout the area.

LR 6.05 (Morine) Project Description/Transportation and Circulation--Figure 3.12--what are parking ratios for Residential Transit Oriented (RTO) district (might be addressed in another document)?

Response: For residential developments in RTO districts, parking up to three cars for each four dwelling units is permitted. Parking up to one car for each dwelling unit may be provided as a conditional use, but parking above one car for each dwelling unit is not permitted (see Section 151.1 of the *San Francisco Planning Code*).

As indicated in section 3.9.2(a) on DEIR page 3-34, the newly-formed RTO district would have "a reduced parking requirement in recognition of transit proximity." In Zone 1, the Design for Development will establish site-specific

development controls, including parking requirements. As indicated in DEIR section 8.3.9 on DEIR page 8-67, the Design for Development proposes that "all added residential units within the Project Area would be allowed to provide one off-street parking space for each unit." In addition, on-street parking spaces would be provided throughout Zone 1. No minimum parking requirement is proposed.

LR 6.13 (Morine) Transportation and Circulation--need to clarify transportation impacts and mitigations-- entire section very confusing; need to include maps to illustrate how conditions will change after project is developed.

Response: In response to this and similar comments regarding the need to provide a clear summary of the various DEIR-identified transportation network mitigation needs for the three analysis scenarios--Existing Plus Project, 2025 Cumulative Plus Project, and 2025 Cumulative Plus Project with Planned Regional Transportation Improvements, a summary chart entitled "Visitacion Valley Redevelopment Program--Roadway System Impacts and Mitigation Summary" has been formulated and included in Appendix 4.5 (Supplemental Transportation Analysis Information) herein. The chart lists each study intersection, freeway segment and freeway ramp addressed in the DEIR traffic analysis, and summarizes associated impact and mitigation findings for each of the three analysis scenarios.

With regard to the various roadway system operational impact findings, "massive gridlock" is not projected; rather, the analysis concludes that under the Existing Plus Project scenario without mitigation, peak hour operational ("level of service" or LOS) conditions--i.e., the average delay per vehicle--at five intersections along Bayshore Boulevard--Bayshore/Blanken, Bayshore/Arleta/San Bruno, Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnydale--could potentially be increased in the AM peak hour without mitigation from current durations of between 12 and 31 seconds per intersection to durations greater than 50 to 80 seconds--i.e., increases in delay of greater than 40 to 65 seconds at each of these five intersections.

Peak-hour operational (LOS) conditions under the Existing Project scenario in the PM peak hour without mitigation would also be reduced due to the Project, with the Project creating a potentially significant increase in peak hour delays at two intersections--Bayshore/Arleta/San Bruno and Bayshore/Leland, from current durations of between approximately 25 and 28 seconds to durations greater than 80 seconds--i.e., increases in delay of greater than 22 to 25 seconds. Implementation of DEIR-recommended mitigations--individual development Transportation Management Plans (TMPs) and elimination of the Project-proposed left-turn lane from southbound Bayshore into Zone 1 at Leland (Mitigations 8-1B and 8-1C) would reduce the degree of added delay, but not to less than significant levels.

The analysis also concludes that under the 2025 Cumulative with Project and Planned Regional Transportation Improvements scenario, peak hour operational (LOS) conditions would be similarly reduced due to the Project. The Project would contribute "significantly" to cumulative increases in AM

peak hour operational (LOS) conditions at four intersections, including three intersections along Bayshore--Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnyvale--and the Tunnel/Blanken intersection. Without mitigation, AM peak hour delays at these intersections with or without the Project could increase to greater than 80 seconds at Leland and Sunnydale and to between 44 and 75 seconds at the other two intersections (current AM peak hour delays at these four intersections range from 12 to 31 seconds).

The Project would contribute "significantly" to cumulative increases in PM peak hour operation (LOS) conditions at two intersections, both along Bayshore--Bayshore/Arleta/San Bruno and Bayshore/Leland. Without mitigation, PM peak hour delays at these two intersections with or without the Project could increase to between 68 and 74 seconds (current PM peak hour delays at these two intersections are between approximately 25 and 28 seconds).

With implementation of the DEIR-proposed mitigations (signal timing and other design modifications, including possible through- and turning-lane restriping), the Project contribution to these projected cumulative future AM and PM peak hour delays could be reduced to a less-than-significant level; however, because these intersection design changes could have adverse effects on Muni transit operations along Bayshore, they will need to be further explored. In this light, the DEIR has described the Project contribution to these projected future peak hour intersection delays as significant and unavoidable.

LR 6.14 (Morine) Transportation and Circulation--mitigation--one measure that could reduce peak traffic is onsite walking distance job generators; consider including this as a traffic-reducing mitigation measure.

Response: The Design for Development (Zone 1) development program already includes an emphasis on mixed use. As shown in Table 3.1 on DEIR page 3-36, buildout of Zone 1 under the Design for Development would result in approximately 1,253 residential units plus 105,000 square feet of commercial (primarily retail) development. Further increasing the amount of job-producing uses in Zone 1 could increase the mode share for pedestrian and bicycle travel as compared to total travel demand, but would also increase the net vehicle trips generated by the project, since these uses would also attract workers from outside Zone 1 and would attract visitors as well. Any increase in external trip making would also increase the project's contribution to impacts on offsite intersections and freeway facilities in the vicinity. It may also be difficult to regulate Zone 1 job-generating uses such as offices to only hire employees living within walking distance of Zone 1. While smaller-scale versions of such a concept--i.e., live-work units--have been implemented in many projects, it would be difficult to implement a similar relationship for large job generators that often require a diverse array of job positions.

LR 7.01 (Seeman) Transportation and Circulation--mitigation--traffic issues problematic and not satisfactorily mitigated--referring to the LOS "F" rating given to major intersections on DEIR page 8-53.

Response: Given the right-of-way and other geometric constraints at these intersections (such as the signal timing and right-of-way requirements for the T-Third light rail line), mitigating the future conditions at these intersections to acceptable operations (i.e., LOS D or better) is not feasible. However, a portion of the intersections would improve with implementation of the anticipated regional roadway changes described in the DEIR [see DEIR pages 8-45, 8-46 (Figure 8.4: Anticipated 2025 Roadway Network Improvements) and 8-57], including the extension of Geneva Avenue and the new US 101 interchange. It should be noted that as conditions worsen for vehicular traffic, it is likely that residents' travel behavior will adapt to take increasing advantage of the various transit facilities in the vicinity of the project, including the T-Third Street light-rail line and Caltrain.

LR 7.02 (Seeman) Transportation and Circulation--need for Geneva Extension--need for Geneva Extension is vital; what is timeline for extension compared with the development of Schlage?

Response: As discussed in the DEIR assessment of future 2025 Cumulative and 2025 Cumulative Planned Regional Improvement scenarios (see DEIR pages 8-45, 8-46, and 8-57 through 8-62), there are several anticipated future transportation infrastructure projects in the vicinity that would improve intersection operating conditions and help offset the anticipated increase in vehicular traffic volumes from the nearby major development projects, including the proposed Geneva Avenue extension. A separate programming environmental review and clearance procedure is underway by the City of Brisbane for the roadway extension and the associated Brisbane Baylands Specific Plan Phase 1 and 2 project. Although the timeline for implementation has not yet been finalized, it is likely that the extension would be required to be constructed prior to substantial buildout of Brisbane Baylands. The Redevelopment Agency and Planning Department in conjunction with the project Zone 1 developer will work with the City of Brisbane in support of the new roadway, as appropriate. It should be noted, however, that this new facility would not be required specifically for the proposed Visitacion Valley redevelopment program, but rather would be needed to accommodate anticipated cumulative development in the southeast San Francisco/north Brisbane/east Daly City area.

LR 7.03 (Seeman) Transportation and Circulation--roadway system analysis scope--would like to see traffic impacts on both San Bruno Avenue to Alemany and Bayshore Boulevard to Chavez studied. These are alternative routes used by neighborhood when freeway is jammed even when Arleta Avenue is backed up.

Response: Based on output from the San Francisco Transportation Authority's travel demand model, the travel characteristics of existing residents in the area, and anticipated future land use patterns, it was projected that the majority of the vehicles generated by the Visitacion Valley project would utilize Bayshore Boulevard north, U.S. 101 and, to a lesser extent (only a small portion of project-generated trips), Third Street, to travel to and from locations to the north of the project site. In general, project-

related traffic tends to disperse at further distances from the site, as there are a multitude of possible roadways for vehicles to use to reach their ultimate destination. Overall, it was anticipated that the 12 "study" intersections, two freeway sections, and four freeway onramps selected for analysis in the DEIR are those most likely to be affected by the proposed project (redevelopment program)--i.e., represent the locations that would experience the highest percentage of project trips. At other locations further afield, the effects of the project would be less.

LR 7.04 (Seeman) Transportation and Circulation--transit--in order to encourage ridership, public transportation needs to become much faster; T-line should have either an express service or make fewer stops, maybe by running on even and odd alternating routes; free passes for Schlage site residences and more express bus lines are worth trying.

Response: As part of their ongoing Transit Effectiveness Project (TEP), the San Francisco Municipal Transit Agency (SFMTA) is reviewing the operations of all transit service throughout San Francisco and making recommendations for near-term service and operations improvements. The main goal of this effort is to enhance the operational efficiency of all lines, and to focus major service on a select number of major corridors like the T-Third light rail line. Throughout this effort, SFMTA will consider all means to improve service, including ideas such as express service, reducing stops, and alternating routes.

Prior to implementation of any of these added service measures, a detailed study would need to be done to evaluate the potential benefits of introducing such service, and what specific operational changes would be warranted (the T-Third Street is currently interlined with the K-Ingleside). Such an analysis should also need to include consideration of the potential loss or reduction in service to certain stops that would impact passengers currently using the line.

It should also be noted that quick access to Downtown is currently provided by the Muni 9BX (San Bruno Express) line, which begins and ends its "local" service portion at the Bayshore Boulevard/Arleta Avenue stop. This line would provide new project residents with a quick downtown-bound service.

As discussed in the DEIR under Mitigation 8-1C, the Zone 1 development sponsor would be required to draft a Transportation Management Plan (TMP), involving a comprehensive set of elements aimed to reduce the travel demand generated by the project and encourage the use of alternative travel modes. One possible element of this plan would be the provision of reduced-fee transit passes to Zone 1 residents.

LR 7.06 (Seeman) Transportation and Circulation/Air Quality-- with and without Candlestick and Baylands projects requested--would like to see analysis of comparative southwest City sector traffic an air impacts (including Visitacion Valley) with and without the proposed regional serving retail in Candlestick and Baylands developments.

Response: Each major development project in San Francisco is required to prepare a transportation assessment that evaluates the transportation impacts specific to that project. Detailed assessments of transportation/ circulation and air quality conditions associated with various components of the Bayview Waterfront (including Candlestick) and Baylands projects are included within the scope of their environmental impact reports, which are currently in process.

LR 7.07 (Seeman) Transportation and Circulation--mitigation--given identified traffic impacts, further discussion on density needed, including possible compromise with developer.

Response: The comment is noted; however, the Zone 1 density level described in the Design for Development and analyzed in the DEIR was carefully formulated by the Planning Department and Redevelopment Agency following an extensive community workshop and Visitacion Valley CAC process. Nevertheless, the Planning Department and Redevelopment Department are not precluded from proposing a reduced development intensity for Zone 1. In that light, the Alternatives chapter of the DEIR (chapter 17) includes a description and summary evaluation of the environmental implications, including traffic, of "Alternative 2: Reduced Housing Development in Zone 1" (see DEIR pages 17-2, 17-6, 17-7 through 17-9, and 17-12 through 17-14). Alternative 2 includes 735 residential units, 850 fewer than what is proposed in the Design for Development (1,585 units).

LR 8.01 (Martin) Transportation and Circulation--further study of local streets needed--further study of impacts and mitigation measures for surrounding streets that connect to Bayshore (e.g., Arleta, Raymond, Leland, Visitacion, Rutland, San Bruno, etc.)--traffic is already backed up on some of these streets for several blocks at morning rush hour

Response: The project Design for Development would create "new" westbound approaches at the intersections of Bayshore Boulevard with Leland, Visitacion and Sunnydale Avenues. While some Zone 1-generated trips would proceed through these intersections into the existing Visitacion Valley neighborhood, given the typical travel patterns during the AM and PM peak periods, most of these Zone 1 trips are expected to turn right or left onto Bayshore Boulevard. As discussed in DEIR section 8.1.1(d) on DEIR page 8-9, the eastbound approaches at these east/west cross-streets can experience queued conditions during peak commute periods. The project would likely contribute to some minor queuing on the eastbound approaches at these intersections, which was accounted for in the traffic analysis.

LR 8.02 (Martin) Transportation and Circulation/Visual Factors--alternative grocery store locations--would be beneficial to analyze traffic implications of two possible alternative grocery store locations: location at corner of Leland/Bayshore in Schlage Lock development rather than historically preferred southern site at Sunnydale Ave. would be problematic in terms of traffic, queuing, parking and aesthetics, particularly at the entry to the new development and adjacent to the "Central Pak"; would be beneficial to have traffic analysis of these two alternative locations to determine, at least in terms of traffic, the better

location for the grocery store. Given anticipated congestion along Bayshore, would seem preferable to draw traffic away from most crowded intersections.

Response: As indicated on DEIR page 3-37, the DEIR growth projections for Zone 1 under the proposed Redevelopment Plan and Design for Development assume that "a new 50,000-square-foot grocery store with housing above would be developed at the northeast corner of Bayshore Boulevard and Sunnydale Avenue.

The trip generation, origin/destination patterns, and modal split of the project's proposed grocery store would be minimally affected by its location within the development. Shifting the location of the grocery store to a location near the Central Park or closer to the intersection of Bayshore/Leland would result in grocery-related trips to utilize different project driveways. However, since this change would also necessitate a corresponding shift in location of other project elements (e.g., relocating additional residential units to the former grocery store site), the overall impact to project traffic volumes at the study intersections would be minimal.

LR 8.03 (Martin)

Transportation and Circulation--need for Geneva Extension--reiterating comments to Planning Commission, given project plus cumulative (anticipated Schlage Lock, Bayview/Hunters' Point, Candlestick, Brisbane Baylands, and Daly City), Geneva Extension must be built as soon as possible; land use and transportation go hand-in-hand; these areas cannot absorb the land use changes proposed without proper transportation infrastructure.

Response: The proposed Geneva Avenue Extension is being analyzed in whole as part of an on-going Brisbane Baylands Specific Plan Phase 1 and 2 planning and environmental review process currently being conducted by the City of Brisbane. The extension and interchange prioritization and interjurisdictional "fair share" funding responsibilities are also being evaluated in the Bi-County Transportation Study context of overall cumulative roadway and transit system improvement needs in the area (see response to comment LR 11.06). These two analyses will assist in the determination of the configuration of the extension and other regional roadway improvements (such as the new Geneva Avenue/Harney Way interchange with U.S. 101) and what portion of the design and construction costs are attributable to the various development proposals throughout the vicinity.

LR 8.04 (Martin)

Transportation and Circulation--transit--"Transit First" policy--impact of eliminating 56 Rutland Muni bus line--City proposes to eliminate 56 Rutland bus line, which would connect new development at Executive Park and surrounding Vis Valley neighborhood to Schlage Lock; this will result in more traffic generated by those forced to drive to new shopping opportunities at Schlage Lock. What will be impact of not having 56 line under project future cumulative development scenario?

Response: The 56-Rutland bus line currently operates with 30 minute headways between 7:00 and 9:00 PM, and has relatively low ridership. MTA staff has reviewed the first set of Muni's ongoing Transit Effectiveness Project

(TEP--operational review) recommendations and recommended that the 56-Rutland line be retained in a shortened route (i.e., eliminating coverage east of Bayshore Boulevard to Little Hollywood and Executive Park) using "van"-like shuttles. Since the TEP only covers short-term improvements to Muni service and operations, it is expected that as new development occurs within the area, Muni will further review the future transit service needs in the area and make additional changes and improvements. It should be noted that Executive Park currently operates a shuttle to bring employees to BART, Caltrain and the T-Third light rail. As part of the on-going revisioning process of Executive Park, an expansion of the shuttle system to provide direct access to Visitacion Valley Redevelopment Program Zone 1 (the Schlage Lock site) is being explored.

LR 8.05 (Martin) Transportation and Circulation--transit--"Transit First" policy--City's plan to build region-serving retail and an entertainment center at Candlestick Park does not support "Transit First" policy and should be considered as a negative impact in the EIR.

Response: The potential regional retail and entertainment center development at Bayview Waterfront (including Candlestick Park) is not related to the proposed Visitacion Valley Redevelopment Program, and is undergoing its own environmental review process. However, it should be noted that the Bayview Waterfront Project (including the Candlestick Point and Hunters Point Shipyard developments) would likely involve substantial changes to transit service in the area in order to accommodate that increase in residents. Possible transit service improvements associated with that development that are currently being considered include a Downtown Express service connecting the development with Downtown and a new BRT service on Harney Way, connecting the proposed retail and entertainment center to the Balboa Park BART/Muni Metro station (currently, this is envisioned as an additional extension of the TEP-proposed 28L extension east to Balboa Park BART and Mission Street).

LR 9.01 (MTA) Transportation and Circulation--proposed intersection mitigations--Bayshore Boulevard/Blanken Avenue intersection--analysis data requested for MTA review--provide results of turning movement template analysis with proposed westbound left turn pocket on Blanken Avenue at Bayshore; analysis should include all turning movements into and exiting Blanken at Bayshore to determine geometry of proposed left turn pocket.

Response: To address the concerns raised by MTA, a truck turning analysis was conducted by the EIR transportation consultant for vehicles making the northbound right-turn from Bayshore Boulevard to Blanken Avenue with the proposed restriping of the westbound approach to provide an additional turn pocket. Diagrams depicting the results of this truck turning movement analysis are included in Appendix 4.5, Supplemental Transportation Analysis Information, of this Final EIR document.

Based on this evaluation, it was determined that trucks longer than 45-feet could not make the northbound right turn at this intersection from the rightmost through lane, but would be able to do so from the left through lane.

Although this movement could result in minor conflicts between these longer trucks and regular street traffic, it would not negate the effectiveness of the proposed mitigation measure.

LR 9.02 (MTA) Transportation and Circulation--proposed intersection mitigations--Blanken Avenue/Tunnel Avenue intersection--analysis data requested for MTA review--provide level of service (LOS) and queuing analysis for proposed conversion of intersection from all-way stop (existing) to signalized. Model of how this signal operates requested. Will it be coordinated with existing signal at Bayshore/Blanken? What will signal cycle lengths be for each intersection? What is LOS with proposed signal at Blanken/Tunnel? Will there be vehicle queuing between signalized Blanken/Tunnel and Bayshore/Blanken intersections?

Response: A proposed lane configuration and signal timing plan for this intersection, both with and without the anticipated regional transportation improvements, has been developed by the EIR transportation consultant in response to this comment. The proposed lane configuration diagram and associated signal timing plan is included in Appendix 4.5, Supplemental Transportation Analysis Information, of this Final EIR document.

Because of the large difference in travel patterns as a result of the anticipated regional transportation improvements, particularly, the Geneva Extension and the new Harney Way/U.S. 101 Interchange, a slightly different timing/phasing plan and lane configuration were assumed in the DEIR for 2025 Cumulative with Regional Transportation Improvements scenario.

On-street parking would be removed on all approaches, and each approach would be restriped to accommodate two lanes approaching the intersection and one receiving lane leaving the intersection. The signal would be actuated-coordinated and would operate on a 110-second cycle, consistent with the adjacent intersections at Bayshore Boulevard/Tunnel Avenue and Bayshore Boulevard/Blanken Avenue. The coordinated movements would be the eastbound right and northbound left and through movements, which would occur concurrently. All other lanes/movements would be actuated with no recall.

The intersection would be offset so as to maximize the coordination from the northbound left at Tunnel Avenue/Blanken Avenue to the westbound left at Bayshore Boulevard/Blanken Avenue and from the northbound right at Bayshore Boulevard/Blanken Avenue to the eastbound right at Tunnel Avenue/Blanken Avenue. This also ensures that queuing on the eastbound approach at Tunnel Avenue/Blanken Avenue is kept to a minimum and does not extend into Bayshore Boulevard/Blanken Avenue.

Peak Hour	Existing plus Project Conditions		Cumulative Conditions			
			Without Transp. Improvements		With Transp. Improvements	
	LOS	Delay	LOS	Delay	LOS	Delay
AM Peak Hour	D	36.2	**F**	**>80.0**	C	34.1
PM Peak Hour	C	31.0	**F**	**>80.0**	D	36.1

As shown in the table above, after the proposed signalization and restriping, the intersection would operate at acceptable levels of service under Existing plus Project Conditions, but would fail in Cumulative Conditions without Transportation Improvements. However, it would operate at acceptable levels of service under the 2025 Cumulative Conditions with Regional Transportation Improvements scenario.

The queuing analysis is summarized in the table below.

Lane Group	Storage Capacity	Existing plus Project Conditions		Cumulative Conditions			
				Without Transp. Improvements		With Transp. Improvements	
		AM	PM	AM	PM	AM	PM
NBL	310'	86'	168'	**>1000'**	**878'**	47'	42'
NBTR	310'	114'	88'	**325'**	**358'**	176'	140'
SBL	230'	87'	131'	115'	218'	135'	226'
SBTR	270'	146'	83'	217'	117'	199'	46'
EBLT	200'	75'	51'	62'	136'	130'	81'
EBR	100'	23'	28'	74'	**150'**	14'	15'
WBL or WBLT	210'	21'	17'	**272'**	**248'**	129'	**219'**
WBTR or WBR	210'	155'	198'	**432'**	**370'**	51'	38'

Source: DMJM Harris, 2008.
Bold indicates a 95th percentile queue length that exceeds the available storage capacity.

As shown in the above table, after the proposed signalization and restriping, there would be sufficient storage capacity on all lane groups to handle the 95th percentile queues for the Existing Plus Project Conditions scenario. The 95th percentile queues for the 2025 Cumulative Conditions without Regional Transportation Improvements scenario would exceed the available storage capacity for several lane groups, including the northbound left lane. Under the 2025 Cumulative Conditions with Regional Transportation Improvements scenario, there would be sufficient storage capacity in all lane groups to handle the 95th percentile queues, with the exception of the westbound shared left-through lane. Given that it exceeds the storage capacity by only nine feet--i.e., less than one car-length--and 95 percent of all queues would be shorter, this is not expected to cause significant problems for side street traffic on Wheeler Avenue.

LR 9.03 (MTA) Transportation and Circulation--transit impact mitigation--ancillary funds for transportation and traffic improvements--Visitacion Valley project development funds should be specifically identified for contribution to

construction of planned T-Third Metro line from existing final stop at Bayshore/Sunnydale to Caltrain Bayshore Station.

Response: DEIR page 8-62 indicates that "the various Muni bus lines serving the Project Area currently operate at substantially less capacity during both the weekday AM and PM peak hours," and "The additional Project-generated transit trips would therefore not be expected to significantly impact peak period transit capacity." Nevertheless, there are various infrastructure funding mechanisms applicable to the Project Area that may provide funds for allocation to transit improvements. As explained previously in section 2.2.2 herein in response to comment LR 11.06, City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to all future development in Project Area Zone 1. In addition, as a condition of future development approvals in Zone 1, the Agency intends to enter into Owner Participation Agreements (OPAs) with Zone 1 developers that would establish local transportation system improvement requirements. In addition, following standard San Francisco DPW practice, establishment of a Public Improvements Agreement (PIA) will be required as a condition of future Project Area subdivision map approvals. Funds collected through these mechanisms may be used to improve traffic, transit, pedestrian, and bicycle circulation in the area. One specific improvement project for which these funds may be used is the potential extension of the T-Third light rail line; however, at this time, the full list of improvement projects has not been identified.

LR 9.04 (MTA)

Transportation and Circulation--mitigation funding--bi-county transportation projects--project should assume responsibility to contribute its fair-share to funding of bi-county transportation projects currently being studied by MTA. Funding mechanism for these improvements has not been finalized. Fair-share contribution would be based on degree of impacts created by all proposed projects in area and other sources of available funding. These improvements, including Geneva Extension, are noted in the DEIR.

Response: Comment noted. The Redevelopment Agency and Planning Department, in concurrence with the Zone 1 development sponsor, are committed to contributing the appropriate fair share to the regional mitigation program. Please see response to related comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein.

LR 9.05 (MTA)

Transportation and Circulation--mitigation funding--pedestrian and streetscape improvements--project should ensure that additional funds from Visitacion Valley Community Facilities and Infrastructure Fee (identified in Planning Code section 319.1) are identified and allocated for pedestrian and streetscape improvements, as noted in the DEIR.

Response: Comment noted. The fees collected pursuant to Planning Code section 319 will be used for the purposes outlined in the ordinance. This measure is included in the EIR-related Mitigation Monitoring and Reporting Plan (MMRP) that has been formulated by the Redevelopment Agency and Planning Department.

Additionally, the latest version of the proposed Design for Development, OPA and PIA mechanisms described in response to comment LR 11.06 in section 2.2.2 herein as part of the future development entitlement process for Project Area Zone 1 would be expected to include developer fair share contribution to Project Area pedestrian and streetscape improvements.

LR 11.01 (Caltrans) Transportation and Circulation--mitigation responsibility--as co-lead agencies, San Francisco Redevelopment Agency and San Francisco Planning Department are responsible for all project mitigation, including any needed improvements to State Highways.

Response: Comment noted. The Redevelopment Agency and Planning Department will to work in conjunction with the Zone 1 developer(s) to propose, evaluate, assess, and develop mitigation implementation measures. Please see more detailed explanation of this required mitigation implementation process in response to Caltrans comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein, and to Caltrans comments LR 11.17 and LR 11.19 which follow below.

LR 11.02 (Caltrans) Transportation and Circulation--mitigation implementation and monitoring responsibility--Visitacion Valley Redevelopment Program's fair share contribution, financing, scheduling implementation responsibilities and monitoring lead agencies should be fully discussed in project-specific traffic studies and the DEIR. Project's MMRP should be included in DEIR.

Response: The project Zone 1 development sponsor will be responsible for mitigating direct project-related impacts, and to contribute the appropriate fair share to the mitigation of future regional (interjurisdictional) impacts. Calculations of the project's fair share contribution to the regional transportation improvements will be subject to the on-going Bi-County Transportation Study effort, which will not be completed by the time the FEIR is adopted.

Following standard CEQA and San Francisco environmental review procedure, a Mitigation Implementation Monitoring and Reporting Plan (MMRP), (pursuant to CEQA section 15097) is being prepared by the Redevelopment Agency and Planning Department, the joint lead agencies, for Planning Commission and Redevelopment Commission approval concurrently with certification of the Final EIR (pursuant to CEQA section 15090) and/or with approval of associated written CEQA findings (pursuant to CEQA section 15091).

The Visitacion Valley Redevelopment Program EIR is the first of a number of anticipated and pending development projects in the City's southeast planning area and vicinity. A full and detailed comprehensive analysis of all of the cumulative effects of all of these projects is beyond the scope of this EIR.

CEQA section 15130, Discussion of Cumulative Impacts, subsection (b), indicates that the discussion of cumulative impacts in an EIR "need not

provide as great detail as provided for the effects attributable to the project alone." "The discussion should be governed by the standards of practicality and reasonableness."

CEQA Guidelines section 15130, Discussion of Cumulative Impacts, subsection (b)(5) stipulates that an EIR should include a "reasonable analysis" of the cumulative impacts of relevant projects and shall "examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative impacts."

A project's contribution to significant cumulative impact will be rendered less than cumulatively significant if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines section 15130(a)(3)). No feasible physical mitigation for the subject Caltrans roadway system components has been identified by the lead agency or Caltrans. No subregional or regional fair share cumulative mitigation program has been officially established by Caltrans in coordination with the local jurisdictions in this area--i.e., San Francisco DPW, the City of Brisbane, the City of Daly City, CCAG of San Mateo County, etc.--that can be cited in this EIR as a means to implement or fund fair share mitigation measures designed to alleviate cumulative impacts of this nature.

Please also see response to Caltrans comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein, and to Caltrans comments LR 11.17 and LR 11.19 that follow below. These responses describe the current interjurisdictional Bi-County Transportation Study program, and explain that Project Area developer fair share contribution to future approved interjurisdictional fair share funding programs will be required.

LR 11.03 (Caltrans) Transportation and Circulation--mitigation implementation phasing and scheduling--residential impacts--scheduling of project phases and required improvements should be clearly identified to ensure that residual impacts (those that remain after mitigation is applied) are clearly identified.

Response: Comment noted. See response to comment LR 11.02 above. The project Zone 1 development sponsor, in conjunction with the Redevelopment Agency, Planning Department and other San Francisco departments, will collaborate to develop an appropriate project mitigation implementation and monitoring program that will be included as part of the project approvals.

LR 11.04 (Caltrans) Transportation and Circulation--mitigation implementation phasing and scheduling--any required roadway improvements should be completed prior to issuance of project occupancy permits.

Response: As indicated in response to comment LR 11.02 above, a project Mitigation Implementation Monitoring and Reporting Plan (MMRP) is being formulated by the Redevelopment Agency and Planning Department. The

MMRP may include mitigation implementation and monitoring linked to specific project approvals and/or building or occupancy permits.

LR 11.05 (Caltrans) Transportation and Circulation--mitigation implementation--encroachment permit requirement--an encroachment permit is required when a project involves work in the State's right-of-way (ROW). Caltrans will not issue an encroachment permit until its concerns are adequately addressed; therefore Caltrans strongly urge the lead agencies to ensure resolution of Caltrans CEQA concerns prior to submittal of an encroachment permit application.

Response: Comment noted. As evaluated, the proposed project does not propose improvements to any Caltrans freeway mainline or ramp facility. If, in the future, it is decided that improvements would be necessary, the project sponsor and the appropriate City agencies would work with Caltrans on any and all permitting requirements.

LR 11.07 (Caltrans) Transportation and Circulation--2025 benchmark year questioned--under baseline and cumulative scenarios, 2025 was used as benchmark year to assess future impacts; DEIR section 3.6.3, Redevelopment Plan Parameters, states that implementation of redevelopment actions will occur over a period of 30 years--i.e., project activities would be carried out until 2038 (assuming plan adoption in 2008); therefore, baseline and cumulative scenario would not adequately reflect project impacts for development between 2025 and 2038.

Response: It is anticipated that development of the proposed project could be completed by year 2025. In addition, this year was the future horizon year of the version of the San Francisco County Transportation Authority travel demand model that was used for the evaluation. With a further out horizon year (such as 2038), the amount of background growth would be higher, which would effectively reduce the project's contribution to the growth in vehicles from existing conditions, and therefore also its fair share contributions.

LR 11.08 (Caltrans) Transportation and Circulation--need for consistency among numerous project vicinity traffic analysis assumptions and methodologies to facilitate review by affected agencies including San Francisco, San Mateo County, Brisbane, C/CAG and MTC. Local and regional planning agencies should coordinate traffic analysis and mitigation to maximum extent possible, due to level of coordination required to ensure transportation infrastructure keeps pace with demand.

Response: Comment noted. All transportation studies undertaken for CEQA purposes in San Francisco utilize the same San Francisco County Transportation Authority countywide travel demand forecasting model (SFCTA Model) to develop travel forecasts for anticipated cumulative new development. Also, the City and County of San Francisco, SFCTA, City of Brisbane, San Mateo County Transportation Authority and Caltrans are currently coordinating to prepare the Bi-County Transportation Study (see response to comment LR 11.06 in previous section 2.2.2 (Project Relationship to Local and Regional Plans) herein. The purpose of this interjurisdictional effort is to develop a consistent set of regional roadway and

transit improvements, priorities and funding responsibilities that will serve to guide the future improvement program for this area.

LR 11.09 (Caltrans) Transportation and Circulation--for planned improvements affecting State ROW, scheduling, costs and viable funding sources correlated to the pace of improvements should be identified.

Response: The project is not proposing to implement (either as part of the project or due to a mitigation measure) any changes to Caltrans freeway mainlines or ramps. The potential extension of Geneva Avenue and the potential new interchange with U.S. 101 are currently undergoing their own planning and environmental review process related to the Brisbane Baylands development program. Presumedly, this planning and environmental review process will include working with Caltrans regarding the required right-of-way, schedule, costs, and funding issues.

LR 11.10 (Caltrans) Transportation and Circulation--cumulative development pending in project vicinity--Table 5.1 (Cumulative Development Pending in Project Vicinity) on DEIR page 5.4 (Land Use section) should be expanded to provide a more comprehensive representation of pending and approved projects in the vicinity. Table should include for each project: lead agency identification, size/units, AM, PM and daily trip generation, and anticipated implementation timeline.

Response: More detailed information regarding the land use program, travel demand estimates, and timelines is not currently available for all regional cumulative projects listed in the DEIR. For the purposes of the Visitacion Valley Redevelopment Program EIR analysis, it was reasonably anticipated that these projects would all be constructed by the 2025 horizon year, and the travel demand estimates were based on output from the San Francisco County Transportation Authority's regional travel demand model for 2025. Separate environmental review processes are or will be undertaken for each of these individual projects, at which time the environmental review lead agency, timeline, and associated travel demand assumptions will be publicized.

LR 11.11 (Caltrans) Transportation and Circulation--cumulative development pending in project vicinity--in Table 5.1, is Bayview Waterfront project different from Candlestick Point project plus Hunters Point Shipyard Phase 2 project? If project characteristics are different, please include the Bayview Waterfront project in the 2007 SFCTA Model on DEIR Transportation and Circulation chapter page 8-26, section 8.3.2, Project Travel Demand.

Response: The Candlestick Point, India Basin Shoreline, and Hunters Point Shipyard Phase 2 (aka, Bayview Waterfront project) are listed as three separate projects in Table 5.1, but are being treated as one "project" for CEQA purposes and will be addressed in one EIR. The Notice of Preparation (NOP) of an Environmental Impact Report for the Bayview Waterfront Project, issued by the Redevelopment Agency and Planning Department on August 31, 2007, indicated that *"Overall, the Bayview Waterfront Project would include new plans for the Candlestick Point, Hunters Point Shipyard, and the*

India Basin Shoreline areas of San Francisco. The Project encompasses an approximately 780-acre area east of US 101 in the southeast area of the City and occupies the waterfront area from India Basin to approximately Candlestick Point. The plan consists of a new stadium for the San Francisco 49ers and a mixed-use community with residential, retail, office/research & development/industrial, civic and community uses, and parks and recreational open space."

As indicated in DEIR section 8.3.2, Projected Travel demand, subsection (a) Methodology/Approach, the San Francisco County Transportation Authority (SFCTA) countywide travel demand forecasting model (SFCTA Model) was used in the DEIR analysis to develop travel forecasts for the analyzed 2025 Project plus Cumulative Scenarios. The SFCTA Model divides San Francisco into 766 transportation analysis zones (TAZs) and also includes zones outside San Francisco for which data is obtained from the Metropolitan Transportation Commission (MTC). The SFCTA Model travel demand estimates incorporate land use and socio-economic growth forecasts for the year 2025 for San Francisco and the remaining eight Bay Area counties, including San Mateo County. The San Francisco projections are based on existing zoning and approved development plans, including the anticipated extent of redevelopment of existing areas. In preparing this EIR, it was specifically determined that the existing SFCTA Model outputs did not include several specific substantial developments currently pending in the vicinity. The model was therefore rerun to add these several specific pending developments, consistent with project information known in November 2007.

Table 5.1 on DEIR page 5-4, the subject of this comment, lists those several specific pending developments that were added to the 2025 model run; they are also listed on DEIR page 8-26. The development specifics for these projects were not listed in DEIR Table 5.1 on page 5-4 or in the DEIR page 8-26 summary listing. The specifics known at that time that were incorporated into the DEIR 2025 cumulative model run are as shown on the expanded cumulative development table on the following page herein. The table on the next page expands upon DEIR Table 5.1, and includes the same project reference numbers and corresponds with the same cumulative project location map, DEIR Figure 5.1. The development specifics in this expanded table were reflected in the DEIR 2025 model run and accurate as of November 2007 and therefore comply with CEQA cumulative projects listing requirements (CEQA section 15130).

The details of these projects, including the number of residential units, number of commercial and office square feet, number of hotel rooms, etc., have continued to evolve upward or downward since November 2007, and may continue to evolve, as the various project design details are refined. For example, the Brisbane Baylands project characteristics assumed in the DEIR were based on the land owner's proposal for a Specific Area Plan submitted to the City of Brisbane in February 2006. Subsequently, in the summer of 2008, the City of Brisbane published a set of community-formulated land use

SUBSTANTIVE CUMULATIVE DEVELOPMENT PENDING IN SOUTHEAST AREA--NOVEMBER 2007 (see DEIR Figure 5.1)

DEIR Fig. 5.1 Reference	Location/Project	Residents (Units)	Commercial (sq. ft.) (a)	Office (sq. ft.)	Hotel and Extended-Stay (sq. ft.) (b)	Other (sq. ft.)
1	**Executive Park**					
	Yerby	500	8,500 neighborhood serving			1,500 community space
	UPC	1,100	2,500 neighborhood serving			2,500 community space
	Total	1,600	11,000			4,000
2	**Visitacion Valley**					
	Schlage	1,250	47,000 supermarket			15,000 community education
			46,400 neighborhood serving			
			11,600 restaurant			
	Subtotal	*1,250*	*105,000*			
	Leland Ave	85				10,000 library
	Bayshore Blvd	250	21,200 community serving			
			5,300 restaurant			
	Subtotal	*250*	*26,500*			
	Total	1,585	131,500			25,000
3	**Candlestick Point**					
	Lennar	6,500	150,000 big-box	150,000	100,000 (b)	12,000 seat arena
			210,000 retail/rest/entertainment			69,000 seat stadium
	Total	6,500	360,000	150,000	100,000	81,000 seats
4	**India Basin Shoreline**					
	East India Basin	1,100				
	Total	1,100				
5	**Hunters Point Shipyard**					
	Phase 2	3,000	150,000 community serving			1,600,000 R&D
	Total	3,000	150,000			1,600,000
6	**Brisbane Baylands**					
	Phase 1		300,000 big-box	1,400,000	800,000	600,000 R&D
			325,000 community serving		700,000 (business)	400,000 convention/trade
			25,000 restaurant			250,000 light industrial
			200,000 auto dealers			
	Subtotal		*850,000*	*1,400,000*	*1,500,000*	*1,250,000*
	Phase 2		930,000 mixed commercial	1,390,000		1,015,000
	Total		1,780,000	2,790,000	1,500,000	2,265,000
7	**Daly City**					
	Cow Palace	1,000	225,000 community serving			
	Total	1,000	225,000			
	TOTALS	**14,785**	**2,657,500**	**2,940,000**	**1,600,000**	**3,975,000**
						81,000 seat arena + stadium

SOURCE: Derived by EIR transportation consultant, DMJM-Korve Engineering, from current San Francisco/San Mateo Bi-County Modeling Effort; November 1, 2007.

Notes:

(a) Retail square footage includes some combination of retail, restaurant and entertainment (cinema, etc.) uses
(b) Candlestick Point: 200 hotel rooms at an estimated 500 sq. ft. per room
(c) Development projections listed in this table are subject to change during the community planning process.
(d) The Bayview Waterfront project includes Candlestick Point, Hunters Point Shipyard Phase 2, and India Basin.

alternatives for the Baylands Specific Plan, and expects to select a community-preferred alternative for full CEQA analysis. The land use alternatives now under discussion by the City of Brisbane include more open space and less development than was described in the land owner's February 2006 proposal.

Similarly the City and project sponsor for the Bayview Waterfront Project (including the Candlestick and Hunters Point Shipyard Phase 2 developments) have made recent revisions to the land use characteristics of that project from those identified in the DEIR. The original proposal in the Conceptual Framework Plan called for 8,500 housing units between the Candlestick and Hunters Point Shipyard developments. When the NOP for the Bayview Waterfront Project was published on August 21, 2007, the project included 9,000 housing units, but mentioned the potential for up to 10,000 units. The land use program inputted into the Visitacion Valley DEIR cumulative conditions modeling work assumed 9,500 units (6,500 at Candlestick Point and 3,000 at Hunters Point Shipyard). The Urban Design Plan for the project published on September 25, 2008 listed a total of 10,000 housing units. The October 25, 2008 Financial Plan discussed a total of 10,500 residential units.

The India Basin Shoreline area project is now being covered in the same Bayview Waterfront EIR. The development program assumed for this project in the Visitacion Valley DEIR totaled 1,100 housing units. Planning staff are now discussing a zoning program that could significantly lower this housing total, and potentially include more commercial use. Such changes do not substantially affect the SFCTA 2025 model-based DEIR project plus cumulative impact and mitigation findings--i.e., do not substantially change the 2025 cumulative roadway and freeway impact and mitigation findings (Impacts 8-4 through 8-8 on DEIR pages 8-44 through 8-62).

The impacts of the final proposals for these three projects and their alternatives will be reviewed for their full range of cumulative impacts in the Draft EIR for the Bayview Waterfront Project to be published in 2009.

LR 11.12 (Caltrans) Transportation and Circulation--cumulative development ending in project vicinity--Table 5.1--please also include list of smaller projects (pending or approved) within surrounding area.

Response: The General Plan/maximum zoning capacity/redevelopment intensification assumptions reflected in the DEIR-applied SFCTA 2025 Model data are conservatively high and inherently account for smaller pending and approved projects causing related transportation impacts within the surrounding area. The 2025 Model includes baseline growth from known projects and anticipated infill development on "soft sites" (properties considered under-utilized) with the potential for new construction, as determined by a Land Use Allocation Model.

LR 11.13 (Caltrans) Transportation and Circulation--Transportation Management Plan initial and follow-up analysis--DEIR page 8-26--initial and follow-up analysis related to

Transportation Management Plan should include data collection from nearby US 101 intersections as well as local roads; same type of data collection and analysis that is recommended for local roads should be applied to US 101/Bayshore/Third Street ramps and US 101 ramps at Alana Way, Beatty Avenue, and Harney Road.

Response: A queuing analysis was conducted by the EIR transportation consultants, DMJM/AECOM, using the Synchro plus SimTraffic 7 software package published by Trafficware for the following three intersections which are directly downstream of area off-ramps:

1. Alana Way/Harney Way/Thomas Mellon Drive (U.S. 101 NB Off-Ramp at Harney Way);

2. Bayshore Boulevard/Hester Avenue (U.S. 101 SB Off-Ramp at Bayshore Boulevard/Third Street); and,

3. Alana Way/Beatty Road (U.S. 101 SB Off-Ramp at Alana Way/Beatty Road).

The results of the queuing analysis for the weekday AM and PM peak hours are summarized in the table below.

Ramp	Storage (ft)	95th Percentile Queue at Downstream Intersection (ft)			
		Existing Conditions		Existing plus Project Conditions	
		AM	PM	AM	PM
U.S. 101 NB Off-Ramp at Harney Wy.	>1000	4	0	8	0
U.S. 101 SB Off-Ramp at Third St./Bayshore Blvd.	>1000	140	215	193	487
U.S. 101 SB Off-Ramp at Alana Wy./Beatty Rd.	1000	74	42	74	47

Ramp	Storage (ft)	95th Percentile Queue at Downstream Intersection (ft)			
		2025 Cumulative Conditions		2025 Cumulative plus Project Conditions	
		AM	PM	AM	PM
U.S. 101 NB Off-Ramp at Harney Wy.	>1000	10	21	17	53
U.S. 101 SB Off-Ramp at Third St./Bayshore Blvd.	>1000	237	279	351	682
U.S. 101 SB Off-Ramp at Alana Wy./Beatty Rd.	1000	83	52	83	52

As shown in the above tables, the project would increase queues at these downstream locations, but these increased queues are not expected to exceed the available storage capacity. Given these expected queue lengths, the project would not result in queues that would stretch to the beginning of the off-ramps, disrupting mainline flows.

It should be noted that under normal conditions, most project-generated traffic is not expected to use the off-ramps at Alana Way/Beatty Road, due to the need to "backtrack" via Tunnel Avenue and Blanken Avenue in order to access the site. While there would be some congestion on southbound Bayshore Boulevard in the vicinity of the project during the peak hours, there would likely still be time savings by using the Bayshore Boulevard/Third Street off-ramp at Hester Avenue as opposed to the Alana Way/Beatty Road off-ramp. Assuming, however, that a small percentage of the project-generated trips do use this "backdoor" to access the site, given the queue lengths in Existing Conditions and Cumulative Conditions and the substantial storage capacity available on the off-ramp, this project-generated traffic is not expected to cause off-ramp queues to stretch into the mainline traffic flow.

LR 11.14 (Caltrans) Transportation and Circulation--additional offramp and freeway mainline analysis requested--in DEIR section 8.1.1, Existing Roadway Network, pages 8-11, and section 8.3.5, Roadway System Impacts, on pages 8-48 and 8-49, provide analysis of offramps and assess potential queues onto freeway mainline.

Response: Please refer to the response to comment LR 11.13 for a discussion of project impacts to off-ramp queuing. As discussed, the project would not cause any queue spillbacks that would affect off-ramps and the freeway mainline.

LR 11.15 (Caltrans) Transportation and Circulation--need for consistency among numerous project vicinity traffic impact analyses--assumptions and methodologies applied to the Existing, Baseline and Cumulative conditions model should be consistent with those applied to traffic studies for other nearby projects listed on DEIR pages 8-26 and 8-27.

Response: Given that each of the various development proposals in the southeast San Francisco/north Brisbane/west Daly City area continue to evolve and change, it would be difficult to ensure that the EIR traffic analysis conducted for each proposal is strictly consistent with respect to cumulative development and other assumptions. As stipulated by CEQA Guidelines section 15125(a), the assumptions used in the Visitacion Valley Redevelopment Program DEIR transportation analysis are consistent with the land use programs and proposal details known at the time the NOP for the EIR was published. All studies within the City and County of San Francisco are also conducted under the methodology and guidance of the San Francisco Planning Department and utilize output from the San Francisco County Transportation Authority's travel demand model. As such, the underlying methodology and approach of these various projects are reasonably consistent. Please refer to the response to comment LR 11.11 for further discussion.

LR 11.16 (Caltrans) Transportation and Circulation--mitigation--mitigation for freeway segment operational impacts--under Mitigation 8-2 on DEIR p age 8-39, where DEIR states "...no feasible mitigation measures...," project future phases should not be approved until adequate mitigation can be developed, funded and implemented, and the project should be required to pay its fair share toward mitigating traffic-related impacts.

Response: All projects in the area will be required to contribute their fair share to mitigate any direct project, or cumulative contribution impacts. The ongoing, interjurisdictional Bi-County Transportation Study is currently developing a series of regional improvement measures and a methodology for prioritizing, scheduling and establishing fair share funding responsibilities. In general, the freeway segments would worsen without development of the project.

LR 11.17 (Caltrans) Transportation and Circulation--mitigation--fair share contribution suggested for local road impacts but not for US 101 impacts--Mitigations 8-2 and 8-4 suggest "fair share contribution" for mitigation of project local and road impacts, but not for impacts on US 101.

Response: The commenter asks why "a mechanism for 'fair share contribution' for traffic mitigation is suggested for project-specific impacts on local roads" "but not for impacts to US 101." The reference in this response to Mitigation 8-4 is apparently a typo, and should be Mitigation 8-5.

The reference in this comment to the DEIR mitigation of "project-specific impacts on local roads" apparently pertains to Mitigation 8-4 for 2025 Cumulative Impacts on Intersection Operation (the project contributes significantly to cumulative impacts on two local intersections--Bayshore Boulevard/Tunnel Avenue and Alana Way/Beatty Avenue), which states: "since the Project would have significant contributions to the future impacts at these two locations, establish a mechanism for Project fair share contribution to the implementation of these mitigation measures."

The reference in the comment to "impacts to US 101" appears to pertain to DEIR-identified Impact and Mitigation 8-2 for Existing Plus Project Impacts on Freeway Segments (DEIR page 8-39), and Impact and Mitigation 8-5 for 2025 Cumulative Impacts on Freeway Segment Operation (DEIR page 8-50). The Project contributes significantly to 2025 cumulative impacts on two freeway segments: U.S. 101 northbound between I-280 and Third Street/Bayshore Boulevard, and U.S. 101 northbound between Sierra Point Parkway and I-380. Mitigation 8-2 stated: "Due to freeway geometry and space constraints at these two locations, there are no feasible mitigation measures that could be implemented to reduce the Project's LOS impacts to less-than-significant levels." Mitigation 8-5 stated, "to improve the affected freeway segment conditions, additional mainline capacity would be needed, which would require land acquisition and involve substantial costs and mitigation issues. Mitigation of this impact is therefore infeasible..."

As explained in DEIR chapter 8, Transportation and Circulation, section 8.2.5, entitled "Visitacion Valley Community Facilities and Infrastructure Fee and

Fund," City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to future residential development in Project Area Zone 1 and in the nearby Executive Park development to mitigate the impacts of this development on public infrastructure in Visitacion Valley. In addition, as indicated in section 2.2.2 of this FEIR document in response to Caltrans comment LR 11.06, as a condition of future development approvals in Zone 1, the Agency intends to enter into Owner Participation Agreements (OPA) with developers that, among other fair share infrastructure mitigation implementation requirements, will establish developer transportation system improvement requirements, some of which may involve fair share contributions to broader, local and regional transportation needs. It is the Agency's intent that all transportation-related fair share developer contribution needs identified in the EIR will be incorporated into the OPA(s).

Regarding the mitigation of Project contribution to significant 2025 cumulative impacts on U.S. 101 freeway segments, the projected poor 2025 cumulative conditions on these affected freeway segments could only be improved by creating additional mainline capacity, which would require substantial additional right-of-way acquisition, substantial freeway reconstruction, and associated substantial costs, and would require an associated interjurisdictional transportation improvement planning, prioritization and fair share funding formulation effort, that exceed the reasonable scope of the Project and reasonable control of the lead agency. Mitigation of this Project-related contribution to 2025 cumulative freeway congestion impacts to a less-than-significant level is therefore considered to be infeasible and the Project-related contribution to this cumulative freeway segment congestion represents a *significant unavoidable impact.*

More specific reasons for this DEIR infeasibility conclusion include:

- freeway mainline widening to provide acceptable operational conditions would require acquisition of substantial additional right-of-way, and substantial and infeasible reconstruction of the affected freeway links and associated existing over- and under-crossings, the costs of which far exceed the reasonable capability and responsibility of the Project, and for which no interjurisdictional fair share funding mechanism has been established;

- the co-lead agency (Planning Department and Redevelopment Agency) does not have jurisdiction over the affected freeway right-of-way; the necessary right-of-way acquisition would necessarily involve Caltrans use of its eminent domain powers;

- expansion of portions of the affected freeway segment rights-of-way is constrained by existing topography,

- acquisition of portions of the necessary additional freeway mainline and associated under- and over-crossing right-of-way, and subsequent construction of the necessary freeway mainline widening and associated

under- and overcrossings, could not be achieved without the displacement of existing households and businesses and demolition of existing residential and commercial structures.

Mitigations 8-2 and 8-5 do state that implementation of individual project Transportation Management Plans (TMPs) as called for under Mitigation 8-1C would decrease the degree of project contribution to freeway segment operational impacts, but not to less-than-significant levels.

The EIR authors are unaware of any Caltrans-formulated or interjurisdiction-formulated improvement (widening) projects and associated funding programs for the affected U.S. 101 freeway segments towards which Project Area developers could be required to make a fair share contribution. The ongoing Bi-County Transportation Study is currently investigating inter-regional cumulative transportation network improvement needs and priorities, and is intended to identify an associated interjurisdictional fair share calculation procedure, as explained in section 2.2.2 herein in response to Caltrans comment LR 11.06. The Planning Department and Redevelopment Agency will continue to participate in this Bi-County Transportation Study; will continue to advocate and cooperate with others in similar interjurisdictional study, planning and fair share funding efforts; and will continue to advocate alternative travel modes, including measures to incentivize increased Muni and Caltrain transit ridership in the area, establish freeway onramp metering in the area, establish HOV lanes in the area, etc.

In response to this comment, the following associated mitigation language has been added to page 3-21 of DEIR chapter 3, Project Description, and section 6.4.3 of the Redevelopment Plan:

"Require Project Area developer fair share contribution to off-site regional roadway system funding needs that have been identified at the time, as part of future OPA and/or other public improvement agreements between the Agency and developer, if and when feasible mitigation and/or improvement fair-share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, have been formulated through interjurisdictional study and cooperation, including the current interjurisdictional Bi-County Transportation Study effort. This requirement shall apply as a condition of approval for any Project Area residential development of 20 units or more, perhaps as part of the Visitacion Valley Community Facilities and Infrastructure Fee and Fund fair share mitigation requirement set forth in the Planning Code section 319."

LR 11.18 (Caltrans)

Transportation and Circulation--mitigation of 2025 cumulative impacts on intersection operation--effects on US 101 offramp--Mitigation 8-4, DEIR page 8-50, the existing pocket length on northbound Harney Way (northbound US 101 offramp) at Alana Way/Thomas Mellon Drive intersection left turn to southbound Alana Way (2,805 feet) is less than queuing length required for 156 cars (3,900 feet) for "2025 Cumulative AM Conditions" scenario; please provide additional mitigations for this impact.

Response: Intersection level of service operating conditions were developed using the Traffix software, the approved analysis software for this purpose in San Francisco. Although this software can be used to accurately forecast intersection delays and levels of service, since it looks at each intersection in isolation, it cannot be used for the evaluation of queuing conditions. As such, a separate comprehensive queuing analysis was conducted for this intersection, which showed that the queues would not affect freeway mainline conditions. For a discussion of that analysis, please refer to the response herein to comment LR 11.13.

LR 11.19 (Caltrans) Transportation and Circulation--mitigation--2025 cumulative impacts on freeway segment operation--mitigation costs and complications do not absolve lead agency--Mitigation 8-5 (DEIR page 8-52) "significant unavoidable impact conclusion," associated land acquisition, substantial costs, and jurisdictional issues are complicated but are regularly resolved to implement mitigation for freeways and do not absolve lead agency from CEQA's mitigation requirements; project should be required to pay its fair share toward mitigation of traffic-related impacts; DEIR should address project traffic impacts and mitigation requirements consistently, regardless of whether impacts involve freeways or local roads.

Response: The Bi-County Transportation Study is currently in process, sponsored by the SFCTA, San Francisco DPW, San Francisco Planning Department, San Francisco Redevelopment Agency, City of Brisbane and the San Mateo County Transportation Authority (see response to comment LR 11.06 in previous section 2.2.2, Project Relationship to Local and Regional Plans). One of the major goals of this effort is to develop a future interjurisdictional mitigation and improvement program, including a methodology for determining prioritization, scheduling and fair share funding contributions from all area-wide projects. As explained above in response to Caltrans comment LR 11.17, since any widening of U.S. 101 would require substantial additional right-of-way acquisition, substantial freeway structure reconstruction, substantial reconstruction of existing over- and under-crossing structures, and associated substantial funding and interjurisdictional agreements that are outside the project's control, freeway widening cannot be considered feasible mitigation in the context of the Visitacion Valley Redevelopment Program EIR. Also, as explained in response to Caltrans comment LR 11.17 above, if and when feasible mitigations and associated fair share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, are formulated and adopted through the interjurisdictional Bi-County Transportation Study effort, associated Project Area developer fair share contribution to these identified funding needs will be required.

LR 11.20 (Caltrans) Transportation and Circulation--mitigation--2025 cumulative impacts on freeway on-ramp operation--DEIR inconsistency--clarification requested--Mitigation 8-6 (DEIR page 8-54) states that anticipated 2025 cumulative freeway on-ramp impacts are expected to be resolved by construction of proposed new ramps at Geneva Avenue, "a planned regional transportation improvement measure;" statement appears to be in conflict with Executive Summary on DEIR pages 2-24 and 2-25 which states that, because funding

for these improvements has not been identified, they have not been assumed as part of 2025 cumulative scenario described in this EIR under Impacts 8-4 through 8-6; please clarify which improvements have been assumed and their scheduling, and identify fair share contribution from Visitacion Valley Redevelopment Program, including financing, scheduling, implementation responsibilities and lead agency monitoring for Impact 8-6.

Response: The future 2025 Cumulative conditions included all major development projects in the area, including the proposed Bayview Waterfront, Executive Park, Brisbane Baylands and Cow Palace projects, in addition to the proposed project. The City of Brisbane is the lead agency for the Brisbane Baylands Specific Plan program and associated potential extension of Geneva Avenue and the U.S. 101 Harney Way interchange projects; these projects are currently undergoing their own separate environmental review and approval processes.

Two versions of the future (2025) cumulative conditions were developed and analyzed in the Visitacion Valley Redevelopment Program EIR: without the proposed regional roadway projects, and with the proposed regional roadway projects--both of which include the same various land use programs throughout the area. These two scenarios were developed to illustrate the full range of potential future cumulative impacts that may occur. Because the Brisbane Baylands Project and Bayview Waterfront Project in particular would directly necessitate these measures, their land use programs could not move forward without these proposed roadway improvements.

The results of the Visitacion Valley Redevelopment Program DEIR transportation analysis indicated that the proposed new interchange and extension of Geneva Avenue would resolve the project contribution to cumulative 2025 traffic impacts associated with these various anticipated developments.

As part of the ongoing Bi-County Transportation Study, a "fair share" calculation for the proposed areawide projects will be developed.

LR 11.21 (Caltrans)

Transportation and Circulation--mitigation--2025 cumulative impacts on intersection operation with planned regional improvements--alternative mitigation requested--please provide alternative mitigation aside from modifying the signal timing phase (i.e., additional lanes) for Mitigation 8-7.

Response: Given the existing right-of-way constraints along the San Francisco local streets in and outside the project area, such as Leland Avenue and Sunnydale Avenue, it would not be feasible to increase the number of lanes available without substantial property acquisition. The widening of Bayshore Boulevard at these locations (at Leland Avenue and Sunnydale Avenue) would also be inconsistent with the desired pedestrian environment being created by the Muni T-Third LRT project. Widening of the roadway to this extent at these two locations would make the pedestrian crossings of Bayshore longer and potentially less safe, and would require more dedicated pedestrian crossing time as part of the signal phasing plan. Also, the signal timings at the intersections with Bayshore Boulevard are

dictated by T-Third light rail line operations, which have signal priority, and the amount of time needed for pedestrians to safely cross the street. For these reasons, alternative mitigation was considered infeasible.

LR 11.22 (Caltrans) Transportation and Circulation--mitigation--2025 cumulative impacts on freeway segment operation with planned regional improvements--sufficient mitigation needed for Impact 8-8--project phase should not be approved until adequate mitigation can be developed, funded and implemented, and project should be required to pay its fair share toward mitigating traffic-related impacts.

Response: As discussed herein in response to comment LR 11.16, projects in the area will be required to contribute their fair share to mitigate any direct project impact, or project contribution to cumulative impacts. The ongoing Bi-County Transportation Study is currently developing a series of regional improvement measures and a methodology for determining associated fair share contributions. In general, the freeway segments would worsen with or without development of the project, thereby not necessitating project-related mitigation.

LR 11.23 (Caltrans) Transportation and Circulation--other mitigation options--please also consider Transportation Operations System and Intelligent Transportation System mitigation options where applicable.

Response: Comment noted. The San Francisco Municipal Transportation Agency (SFMTA) is responsible for all ITS and TOS programs in the city, and has been working to implement and improve all signalized intersection operations and coordination activities.

LR 11.24 (Caltrans) Transportation and Circulation--Technical Appendix--under Existing plus Project Conditions scenarios analysis, AM and PM peak volumes for two intersections were switched--i.e., for Alana Way/Beatty Avenue (intersection #9000) and Alana Way/Harney Way (intersection #10000).

Response: In response to this comment, a detailed review of the volumes in the DEIR appendix was conducted, and they were determined to be correct.

LR 11.25 (Caltrans) Transportation and Circulation--CEQA-Required Assessment Conclusions--growth inducing impacts--external roadway impacts and improvement needs--statement on DEIR page 16-3 that primary project growth inducing impacts would be confined within Project Area should be supported by data and analysis; certain roadway improvements necessitated by the project would occur outside the project boundaries.

Response: The DEIR does not intend to suggest by the cited language on DEIR page 16-3 that certain offsite roadway improvements would not be necessitated by the Project. DEIR Chapter 8, Transportation and Circulation, is explicit with regard to Project-related offsite transportation system impacts and related mitigation needs.

Transportation improvements were evaluated throughout the study area and included an evaluation of mitigation and improvement measures at all study intersections.

The referenced language on DEIR page 16-3 with respect to external growth inducement has been revised in response to this comment, and now states (the "bracket" in the left margin indicates the location of the revised lines):

The primary growth-inducing impacts of the Project would be confined within the boundaries of the Project Area. To a lesser degree, secondary growth-inducing impacts (the "multiplier" effect) could also be expected in portions of the City and immediate area outside the Project Area boundary. In particular, Project-induced increases in the local residential population could be expected to have a "multiplier" effect, increasing community-supporting commercial and other activities in the surrounding area. In addition, Project-facilitated infrastructure improvements, including the transportation system impact mitigation measures identified in chapter 8 (Transportation and Circulation) herein, as well as the land use intensification that would be facilitated within the Project Area, might induce additional pressure to intensify use of adjacent underused lands in the City of Brisbane's Baylands area.

Such secondary growth-inducing land use impacts outside the Project Area would occur primarily in the form of future individual development and business activity proposals and associated applications. Most of this primary and secondary growth inducement would be expected to occur in a manner consistent with existing General Plan and zoning controls and, where applicable, would also be subject to project-specific environmental impact documentation and public review under CEQA to ensure that any associated significant adverse environmental impacts are adequately addressed. These standard procedures and requirements would be expected to reduce such secondary growth-inducement impacts of the Project to less-than-significant levels, unless specific statements of overriding consideration were adopted consistent with CEQA.

LR 11.26 (Caltrans) Transportation and Circulation--mitigation--spillover impacts on state roads and facilities--consider improving pedestrian access and path at travel by implementing list provided of suggested pedestrian connectivity, crosswalk treatment, crosswalk widening, sidewalk widening, crosswalk shortening (bulb-outs), ADA compliance crossway ramp and audible pedestrian countdown signal head improvements, and adopting Travel Demand Management (TDM) policies for developments (e.g., lower parking ratio, car-sharing programs, transit subsidies) to encourage use of nearby transit.

Response: There is currently excellent pedestrian access to the T-Third Street stations at Arleta and Sunnydale, with pedestrian walk indicators and countdown signals. Bright yellow tactile treatments are provided at all crosswalk ramps on Bayshore Boulevard in the vicinity of the project, providing increased safety for the visually impaired and increasing driver visibility of curb queuing areas where pedestrians may be waiting.
As noted under DEIR Mitigation 8-1C (DEIR page 8-38), the Project would be

required to implement a transportation management plan (TMP) comprised of several cohesive elements, such as carpool matching services, carshare hubs, real-time transit information, discounted transit passes, and parking supply reductions.

LR 11.28 (Caltrans) Transportation and Circulation--encroachment permit requirement--Caltrans encroachment permit application process summarized.

Response: Comment noted. Any future mitigation elements that require encroachment permits will be coordinated with Caltrans.

LR 11.29 (Caltrans) Transportation and Circulation--mitigation--mitigation monitoring--Caltrans mitigation monitoring submittal guidelines for public agencies--the Caltrans guidelines affect agencies that have approved development projects--these agencies are required under CEQA to provide Caltrans reports on transportation related mitigation monitoring measures--CEQA Guidelines citation provided.

Response: Comment noted. Caltrans will receive copies of all documents, if requested.

LR 11.30 (Caltrans) Transportation and Circulation--mitigation--Caltrans mitigation monitoring guidelines--please complete, sign and return to Caltrans a Caltrans-established Certification Checklist form for each approved development project that includes transportation-related mitigation measures once the mitigation have been approved and also when they are completed.

Response: If any element of the project will necessitate interaction with Caltrans, all appropriate forms and coordination guidelines will be followed.

LR 12.02 (DPH) Transportation and Circulation--pedestrian conditions--section 8.13, Pedestrian Conditions, on DEIR page 8-16 should include baseline data on pedestrian-vehicle collisions in project area. Collision rates map would be helpful (comment letter follows this comment with the necessary data and map information).

Response: The San Francisco Municipal Transportation Agency (SF MTA) regularly monitors the current pedestrian activity and accident information throughout the city. Within the vicinity of the project site, there are no locations within the identified top twenty pedestrian safety location of concern in the City.

LR 12.03 (DPH) Transportation and Circulation--pedestrian impacts--section 8.3.7, Pedestrian Impacts, on DEIR page 8-64, should note that sidewalk capacity is only one element of an adequate pedestrian environment; concepts of pedestrian levels of service or pedestrian quality also incorporate many other elements. DPH preliminary analysis indicates that pedestrian quality in areas just south of Schlage Lock site, specifically along Bayshore near Third Street Light Rail stop, and along segments of Blanken Avenue, was poor and could benefit from greater investments to promote walking and biking to/from Leland Avenue and Candlestick Park (map provided). Project sponsor may consider, as an improvement measure, conducting an analysis of the

pedestrian environment using an available instrument such as the San Francisco Pedestrian Quality Index.

Response: Comment noted. As part of the proposed project, substantial improvements to on-site pedestrian access are proposed, including new pedestrian sidewalks and walkways and improvements to existing sidewalks, including supporting the Leland Avenue Streetscape Plan. These will provide alternative pedestrian routes through the site, instead of requiring use of the current sidewalks along Bayshore Boulevard and cross-streets. The evaluation of area-wide transportation conditions is beyond the reasonable scope of the Visitacion Valley Redevelopment Program EIR and study effort, but may be appropriate as part of one of the much larger-scale development projects currently pending in the area (such as the Bayview Waterfront Project) or the Bi-County Transportation Study.

LR 12.04 (DPH)

Transportation and Circulation--pedestrian impacts--DEIR page 8-65 identifies roadway intersection conditions that create pedestrian-vehicle conclusions and suggests an increase in the frequency of conflicts and conclusions--these project-related effects appear to be a potentially significant impact requiring mitigation. Subsequently, DEIR identifies a number of pedestrian injury mitigation strategies to be integrated into project--this suggests an unacknowledged potentially significant impact. Some critical mitigation strategies (a number are suggested--e.g., bulb-outs, etc.) are suggested to reduce impact to less than significant level. DEIR should provide substantial evidence for the basis of its determination that project design elements combined with existing hazards and increased flows will result in a less than significant impact.

Response: The project proposes to include a series of pedestrian improvement measures, including corner bulbs at the major intersections with Bayshore Boulevard. In addition, the project would include substantial improvements to pedestrian facilities throughout the project site. Through the pedestrian evaluation conducted for the DEIR, it was determined that although the number of pedestrian/vehicular conflicts may increase (due to the increase in pedestrian and vehicular volumes), these would not rise to the level of significant safety impacts. Therefore, mitigation is not required.

LR 12.05 (DPH)

Transportation and Circulation--bicycle impacts--DPH supports mitigation described in DEIR section 8.3.8, Bicycle Impacts, to avoid impacts on bicycle conditions.

Response: Comment noted.

2.2.7 Air Quality

LR 6.15 (Morine)

Air Quality--mitigation--Mitigation 9-1 (Remediation- and Construction-Related Air Quality Impacts)--no mention of post-demo air quality issues resulting from inactive parcels after demo--add language addressing interim dust control.

Response: The following has been added to Mitigation Measure 9-1A on Page 9-17 in response to this comment: *"Apply (non-toxic) soil stabilizers to demolition areas after completion of demolition activities."*

LR 7.05 (Seeman) Air Quality--idling engine emissions--increase in idling engines on residential streets a concern (esp. for children with asthma); although geography limits alternative route possibilities, need to look at stronger measures to mitigate inevitable problems given all of the anticipated development coming our way.

Response: The DEIR discusses problem pollutants and their general health effects on DEIR pages 9-3 to 9-7.

Carbon monoxide, which is a localized pollutant, was analyzed using available air quality models and compared to state and federal ambient air quality standards. Impacts were found to be less than significant (see DEIR section 9.9.3, page 9-20).

Other problem air pollutants are ozone and particulate matter. Both of these pollutants have been shown to be correlated with adverse heath effects. The Bay Area Air Quality Management District, like other air districts across the state, have recommended that project impact significance not be based on a specific change in projected concentration, but be based on a mass emission. This analysis and effect are discussed under Impact 9-2 of the DEIR; the discussion concludes that the project would have a significant impact for both ozone and PM_{10}.

Mitigation Measure 9-2 addresses the reduction of these vehicular emissions generated by the project.

LR 7.06 (Seeman) Transportation and Circulation/Air Quality-- with and without Candlestick and Baylands projects requested--would like to see analysis of comparative southwest City sector traffic and air impacts (including Visitacion Valley) with and without the proposed regional serving retail in Candlestick and Baylands developments.

Response: This without-region-serving-retail alternative analysis request for the Bayview Waterfront Project and Brisbane Baylands Project exceeds the reasonable scope of the Visitacion Valley Redevelopment Program EIR. These possible transportation and air quality evaluation alternatives are more appropriately relevant to the scope of the Bayview Waterfront Project EIR, currently being completed by the San Francisco Redevelopment Agency and Planning Department, and the Baylands Specific Plan EIR, currently being completed by the City of Brisbane. The "Bayview Waterfront Project," as described in the Bayview Waterfront Project EIR now being prepared, includes the new plans for Candlestick Point, as explained in response to comment LR 11.11 in previous section 2.2.6, Transportation and Circulation. Pursuant to CEQA Guidelines section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project), the Bayview Waterfront and Brisbane Baylands EIRs will each be required to identify and evaluate a reasonable range of alternatives to the proposed action. In addition, the ongoing interjurisdictional Bi-County Transportation Study is anticipated to

include identification and evaluation of alternative land use scenarios for key development sites in the area.

Please also see response to related comments LR 6.07 and LR 11.11 in previous section 2.2.3, Land Use, and LR 11.02 in previous section 2.2.6, Transportation and Circulation.

LR 8.06 (Martin) Air Quality--wind--strong west to east winds are problematic in the Valley; would be beneficial to find a means to design site so that wind force could be mitigated in some way.

Response: The windy nature of the site is noted on page 9-2 of the DEIR. The initial study for the proposed project noted that while wind evaluations are required in certain areas of the city, the Project Area is not within these areas. The initial study concluded that the project would result in the development of many new buildings, but none of the proposed structures would be tall enough to create a significant impact on ground level comfort conditions.

LR 10.01 (Cincotta) Air Quality--greenhouse gases impacts--DEIR consistency with latest CEQA Guidelines on global climate change--DEIR page 9-25 states that "there are currently no published thresholds of significance for measuring the impact of global climate change..." Please confirm that DEIR global climate change analysis is consistent with new Guidelines for CEQA published by OPR on June 19, 2008.

Response: The DEIR includes an evaluation of project greenhouse gas (GHG) emission and climate change impacts which is consistent with CEQA and other related state regulatory provisions and guidelines in effect at the time the Notice of Preparation for this EIR was published (the Notice of Preparation of a Draft EIR for the Visitacion Valley Redevelopment Program was published and distributed on January 31, 2007). The discussion of Project GHG emission and global climate change impacts presented on DEIR page 9-6 through 9-8 [subsection (j), Greenhouse Gases and Global Climate Change], 9-13 through 9-14 (section 9.2.3, Statewide Actions, and section 9.24, Local Actions), and 9-25 through 9-27 (Greenhouse Gases Impacts), is fully consistent with state requirements and normal CEQA practice on GHG and global climate change impact assessment as of January 31, 2007. In particular, the DEIR discussion identifies, and is responsive to, the Governor's Executive Order S-3-05 statement of GHG emissions reduction target dates, and Assembly Bill 32, the California Global Warming Solutions Act of 2006. The DEIR discussion includes reference to the list of GHG reduction measures compiled by the State Attorney Generals Office as of March 1, 2008.

Since January 31, 2007, state Senate Bill 97 was enacted to amend the CEQA statute to clearly establish that the effects of GHG emissions are an appropriate subject for CEQA analysis and directed OPR to develop guidelines by July 1, 2009, for State Resources Agency adoption by January 1, 2010, "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." Also subsequent to publication of the January

31, 2007 NOP, OPR released a June 2008 CEQA and Climate Change Technical Advisory[1] that provides additional interim "informal guidance" regarding the steps lead agencies should take to address climate change in their CEQA documents.

The Advisory indicates that lead agencies should determine whether greenhouse gases may be generated by a proposed project, and if so, quantify or estimate the GHG emissions by type and source. Second, the Advisory indicates that lead agency must assess whether those emissions are individually or cumulatively significant. When assessing whether a project's effects on climate change are "cumulatively considerable" even though its GHG contribution may be individually limited, the Advisory indicates that the lead agency must consider the impact of the project when viewed in connection with the effects of past, current, and probable future projects. Finally, if the lead agency determines that the GHG emissions from the project as proposed are potentially significant, the Advisory indicates that it must identify and implement measures to avoid, reduce, or otherwise mitigate the impacts of those emissions.[2]

Also, in response to SB 97 and the June 2008 CEQA Advisory, San Francisco has taken the following additional climate change related actions since publication of the January 2007 DEIR:

(1) The City has issued a November 2008 update to its Standard CEQA Climate Change language describing these new statewide actions and the associated new City climate change control actions listed below;

(2) The City has adopted a new Greenhouse Gas Reduction Ordinance (May 2008) amending the San Francisco Environmental Code to establish City greenhouse gas emissions 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

[1]California Governor's Office of Planning and Research, *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*; June 19, 2008. (CEQA Climate Change Technical Advisory, June 2008)

[2]State of California, Governor's Office of Planning and Research, *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review* (CEQA TA), June 19, 2008; page 1

- 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.

(3) On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched their "GoSolarSF" program for 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.

(4) 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.

These new City requirements will apply to future Project Area development.

Although the GHG impact discussion on page 9-25 of the DEIR was prepared and published prior to the availability of OPR's June 2008 "CEQA and Climate Change" Technical Advisory and the latest San Francisco climate change control actions listed above, the DEIR language is generally consistent with the June 2008 CEQA Advisory--i.e., the DEIR discussion includes quantification of project-related GHG emissions resulting from the project-facilitated net development increase in Zones 1 and 2 in appropriate carbon dioxide equivalents (the "common practice" GHG emissions quantification unit) not including anticipated project GHG reduction measures incorporated into the proposed Zone 1 development (LEED provisions, etc.), as well as quantification of estimated project-related GHG emissions from project-related off-site electricity generation and solid waste disposal, and discusses these quantified totals in the context of cumulative regional and global GHG increases. The DEIR discussion also concludes that the project incorporates many of the GHG emissions reduction measures identified by the State Attorney General's Office as of March 2008 (infill development, good transit access, urban landscaping, energy efficiency standards, construction demolition debris recovery, etc.). The discussion ultimately concludes, based on a full discussion of such evidence, that the proposed Project would not emit a substantial (significant) amount of GHG emissions nor contribute significantly to global climate change.

LR 12.01 (DPH)

Air Quality--Air Quality Element--edits requested to wording in final sentence of this section on DEIR page 4-12 so that it reads: The project goals would reduce mobile source emissions at a regional level, but will increase mobile source emissions in the project area; otherwise, language is misleading.

Response: Comment acknowledged. In response, the wording in the final sentence of this section on DEIR page 4-12 has been revised to read: "In general, the proposed Project goals to increase transit access and enhance non-auto travel (see section 4.1.6 above) would reduce the degree of Project-related mobile source emissions increases." This revised version of DEIR page 4-12 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.06 (DPH) Air Quality--air pollutants and ambient standards--BAAQMD jurisdiction--DEIR page 9-3--section should clarify that BAAQMD regulates stationary emissions in Bay Area.

Response: The language on DEIR page 9-3 that read, "An air quality management district is responsible primarily (underline added) for regulating stationary emission sources at facilities within its geographic areas and for preparing the air quality plan as required under the federal Clean Air Act and California Clean Air Act," has been revised in response to this comment to read: "An air quality management district is responsible for regulating stationary emission sources at facilities within its geographic areas and for preparing the air quality plan as required under the federal Clean Air Act and California Clean Air Act, and for enforcing CARB ambient air quality and mobile emission source standards." This revised version of DEIR page 9-3 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.07 (DPH) Air Quality--air pollutants and ambient standards--DEIR page 9-6--corrections provided to language here about particulate matter and health.

Response: The first sentence on Page 9-6 has been modified as follows: *"Extensive research reviewed by CARB indicates that exposure to outdoor PM_{10} and $PM_{2.5}$ levels ~~exceeding current ambient air quality standards~~ is associated with increased risk of hospitalization for lung and heart-related respiratory illness..."* This revised version of DEIR page 9-6 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.08 (DPH) Air Quality--air pollution and ambient standards--asbestos--DEIR page 9-6--additional information (paragraph) provided for insert here to clarify State regulations for asbestos.

Response: In response to this comment, the following suggested additional language on State asbestos regulation has been added to DEIR page 9-6: *State of California regulations require an asbestos airborne toxic control measures (ATCM) determination for construction and grading activities in areas known to have naturally occurring asbestos (NOA) (California Code of Regulations § 93015). In 2002, the Bay Area Air District subsequently issued regulations for the control of airborne asbestos for areas where NOA is found or is likely to be found. Information on the regulation is available at the URL: http://www.baaqmd.gov/enf/compliance_assistance/asbestos_atcm/index.htm. Under the air districts regulations, all construction projects that disturb less than one acre must comply with specified control actions, including application of water to areas being excavated or grading, wetting or covering soil storage piles, limiting vehicle speeds, and controlling dispersion by vehicles offsite. Projects that disturb greater than one acre must gain approval from the district*

on a more comprehensive written plan to minimize emissions and control sources. This revised version of DEIR page 9-6 has been included in section 3 (Revisions to the Draft EIR) herein.

LR 12.09 (DPH) Air Quality--San Francisco General Plan--DEIR page 9-12--please include reference to Air Quality Element--Policy 3.7 pertaining to assessment of air quality hazards.

Response: In response to this comment, the suggested reference to Air Quality Element Policy 3.7 pertaining to assessment of air quality hazards has been added to DEIR page 9-12. Air Quality Element Policy 3.7 states: *Exercise air quality modeling in building design for sensitive land uses such as residential development that are located near the sources of pollution such as freeways and industries.* This revised version of DEIR page 9-12 has been included in section 3 (Revisions to the Draft EIR) herein.

LR 12.10 (DPH) Air Quality--long-term local air quality effects--roadway related air pollution impacts--DEIR does not provide any analysis offroad-related air pollution impacts on new sensitive uses related to significance criteria (4) and (5). Such impacts are potentially significant because of proximity of development to busy roadways in San Francisco. Health research data presented in comment on such effects. SFDPH guidance for assessing and preventing impacts associated with locating new residential uses near roadway air pollution hot spots cited in comment. DEIR at a minimum should identify the potential issue, conduct a screening level analysis to determine whether an air quality assessment of the site is warranted, and conduct the assessment if indicated. SFDPH believes that roadway volumes will not likely trigger requirement for detailed air quality monitoring; however, Department needs information on roadway volumes to make this determination. If needed, SFDPH can conduct analysis of roadway related air pollutants for the project sponsor.

Response: In 2005 the California Air Resources Board published an air quality/land use handbook.[1] The handbook was developed in response to recent studies that have demonstrated a link between exposure to poor air quality and respiratory illnesses, both cancer and non-cancer related. The CARB handbook recommends that planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools and playgrounds. Air pollution sources of concern included:

High traffic freeways and roads,
Distribution centers,
Rail yards,
Ports,
Refineries,
Chrome plating facilities,

[1]California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective,* 2005.

Dry cleaners, and
Large gasoline dispensing facilities.

A key recommendation in the CARB handbook is to avoid siting new, sensitive land uses within 500 feet of a freeway or urban roadway with 100,000 or more vehicles per day. The Project Area does not include any lands within 500 feet of a freeway or roadway carrying 100,000 vehicles per day. The closest segment of the U.S. 101 James Lick Freeway to the Project Area is approximately 1,150 feet away--i.e., greater than 500 feet. While rail lines do pass through the Project Area, there are no remaining operational rail yards within or near the Project Area.

In May of 2008 the San Francisco Department of Public Health (DPH) published additional guidelines for assessment and mitigation of health effects from roadways that go beyond those of the CARB.[1] According to this DPH document, a potential hazard exists if average daily traffic volumes exceed the following thresholds:

- 100,000 vehicles / day within a 150 meter radius
- 50,000 vehicles / day within a 100 meter radius
- 10,000 vehicles /day within a 50 meter radius.

The guidance document provides a screening procedure and a methodology for determining health risk acceptability for specific sensitive receptors prior to development approval. These screening analysis procedures, including estimation of exposure (where warranted) and incorporation of mitigating design measures recommended by the DPH into the development design would be required when individual project plans are submitted for Planning Department review.

LR 12.11 (DPH) Air Quality--long-term air quality effects--SFDPH disagrees with statement on DEIR page 9-20, section 9.3.3, Long-Term Air Quality Effects, that carbon monoxide is pollutant of greatest concern associated with new vehicle trips and traffic patterns. Traffic-related air pollutants with potential health impacts also include particulate, nitrous oxides, and mobile source air toxics like diesel exhaust. *(Statement based on BAAQMD guidelines.)*

Response: In response to this comment, the second sentence of the second paragraph on page 9-20 which stated, "At the local level, the resultant pollutant of greatest concern is carbon monoxide," has been deleted. Please see this revision to DEIR page 9-20 in section 3, Revisions to the Draft EIR, herein.

LR 12.12 (DPH) Air Quality--construction period impacts--DEIR page 9-18--SFDPH commends DEIR inclusion of best management practices to mitigate construction period air quality impacts.

Response: Comment acknowledged. No response necessary.

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[1]San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review,* May 6, 2008.

2.2.8 Cultural and Historic Resources

LR 1.01 (DTSC)

Cultural and Historic Resources--mitigation--participation in mitigation activities by Native American Heritage Commission (NAHC) and other interested parties--prior to proceeding with Mitigations 10-2 through 10-4, project proponent should request Sacred Land File Search from the NAHC. DEIR should include mitigations that require project proponent to furnish project information to list of tribal contact supplied by NAHC and other individuals or groups with interest in project and invite them to participate in CEQA process. Interested parties may express interest in participating in archaeological field studies, for example, as monitors or consultants during subsurface activities. Interested parties may also wish to participate in development of specific archaeological discovery plan to facilitate timely, legal and culturally-appropriate action in the event that human remains and/or potentially significant Native American resources are unexpectedly encountered during earth disturbing activities.

Response: Standard City procedure requires archaeological consultant to request a Sacred Land File Search and the most recent roster of Native American contacts for San Francisco from the Native American Heritage Commission (NAHC) in commencing preparation of any City-required archaeological document. Initial contacts by letter to designated Native Americans are followed-up by at least two phone contacts. Mitigation Measures 10-2, 10-3 and, by implication, 10-3 require solicitation of the participation of a Native American Most Likely Descendant (MLD) in the event of the discovery of Native American Human remains, as also required by State Law (Public Resources Code Sect. 5097.98), and all reasonable efforts to be undertaken to develop an agreed-upon plan for the treatment of human remains and associated or unassociated burial objects.

LR 1.02 (DTSC)

Cultural and Historic Resources--mitigation--timing should be stated--Mitigation Monitoring and Reporting plan--DEIR should state that timing of DEIR-listed mitigations, i.e., required survey, analysis and data recovery activities, will be developed after public review period in a Mitigation Monitoring and Reporting Plan and incorporated by reference in the Final EIR. The lead agencies need to complete non-intrusive historic and archaeological surveys and be prepared to mobilize appropriate specialists well in advance of commencing intrusive building removal and remedial activities.

Response: Comment acknowledged. See response to comment LR 1.01 above. The Mitigation Monitoring and Reporting Plan indicates the sequence in which the archaeological mitigation measures are to be implemented. In accordance with Mitigation Measures 10-2, 10-3, and 10-4 no project soils disturbing activities, such as demolition, excavation, hazardous waste remediation or archaeological field investigations are to occur prior to the preparation of the required archaeological document, including an archaeological testing plan and archaeological monitoring plan.

LR 6.16 (Morine) Cultural and Historical Resources--mitigation--for Mitigations 10-2, 10-3 and 10-4, and discovery notification procedure should include notification of designated members of the community.

Response: Comment acknowledged. This revision has been added to each of these mitigations. Please see these revision to DEIR pages 10-27, 10-32 and 10-35 in section 3, Revisions to the Draft EIR, herein.

LR 10.02 (Cincotta) Cultural and Historic Resources--categories of significant resources--DEIR lists several "contributors" on page 10-21, but not clear regarding to which categories of significant resources, Category A or B from SF Preservation Bulletin 16, these resources (contributors) belong; please clarify.

Response: The text on DEIR page 10-20 clearly states that there are no Category A structures in the Project Area. Moreover, all contributors described on DEIR page 10-21 are Category B structures. Schlage Building A (the Old Office Building) was identified in the 1976 Architectural Survey, while all other contributors are over 50 years of age and proposed for demolition. (See page 6 of SF Preservation Bulletin 16 -- "Properties More than 50 Years Old Proposed for Demolition or Major Alteration" fall into Category B.).

LR 10.03 (Cincotta) Cultural and Historic Resources--mitigation--some identified "mitigations" may be more appropriately labeled "improvements"--Mitigation 10-1 (DEIR page 10-25) identifies measures (salvage, commemoration, contribution to historic preservation fund) which it acknowledges do not mitigate any significant impact; such measures may be more appropriately designated as Improvement Measures instead of Mitigation Measures.

Response: The EIR historic resources consultants regularly include mitigation measures that, if implemented, reduce this impact, but do not fully mitigate the impact of a demolition to a level of less than significance. Such CEQA-related mitigation measures are not commonly referred to as "improvement measures" in CEQA documents, as suggested. There is no CEQA provision that suggests such measures are not "mitigation."

LR 10.04 (Cincotta) Cultural and Historical Resources--mitigation--mitigation responsibility needs clarification--request for clarification regarding which mitigation measures are Redevelopment Agency responsibility and which are individual developer responsibility.

Response: The Redevelopment Agency and Planning Department are proposing the plan for which this EIR was prepared. As such the mitigation measures are addressed to the Redevelopment Agency and Planning Department. However, since there is a developer for the Schlage Lock already on board, it is assumed that the Redevelopment Agency and Planning Department will require the developer to implement such measures as a condition of approval for any future development activity, including demolition permits.

The Mitigation Monitoring and Reporting Plan clarifies the relative responsibilities of the SFRA and project developer in the implementation of the requirements of the archaeological mitigation measures.

As a side note, UPC has already issued a Request for Proposal (RFP) and selected a consultant to prepare a scope of services to implement the DEIR-required historic resource mitigation measures (archaeology is not mentioned in the RFP).

LR 10.05 (Cincotta) Cultural and Historical Resources--mitigation--Mitigation 10-2--clarifications regarding responsibility and timing requested--mitigation requires project sponsor to retain services of a qualified consultant to perform certain reports, testing and monitoring; "unclear as to when SFRA will hire such a consultant and when required reports will be completed; suggest that such measures be done as soon as possible to prevent delays; request clarification as to when other testing and monitoring will be performed."

Response: See response to LR 1.02.

2.2.9 Hazards and Hazardous Materials

RC 2.02 (Jackson) Hazards and Hazardous Materials--clean-up--will Universal Paragon or who will be responsible for clean-up of the area; City does not have the money

Response: The description of status of remediation in DEIR section 11.1.2, Historical Uses and Ongoing and Future Remediation Activities in Redevelopment Zone 1, on page 11-1 through 11-11 of the DEIR Hazards and Hazardous Materials chapter is adequate under CEQA in that it accurately represents the existing setting at the time the environmental analysis commenced (pursuant to CEQA Guidelines section 15125(a)). In response to this and similar comments regarding the ongoing status of the Zone 1 remediation program, Appendix 5.4 of this Final EIR, Remediation Status Update for Redevelopment Zone 1, includes the latest documentation (as of October 15, 2008) on the remediation program for the Redevelopment Zone 1 properties. Appendix 5.4 includes two components: (1) a September 2008 "Summary of Environmental Conditions and Planned Remediation of the Former Schlage Lock and Universal Paragon Corporation (UPC) Properties" prepared for the San Francisco Redevelopment Agency by Brownfield Partners, LLC; and (2) a September 8, 2008 memorandum to the San Francisco Redevelopment Agency from the Universal Paragon Corporation (UPC) describing the results of a legal settlement between UPC and the Ingersoll Rand Company regarding responsibility for remaining remediation needs.

In summary, the two documents: (1) explain that a May 28, 2008 legal settlement has transferred ownership of the 12-acre former Schlage property from Ingersoll Rand to UPC and transferred remediation and environmental liability for the project to Brownfield Partners, remediation/technical contractors, who will undertake the regulatory administration and insurance negotiation process obligation for the remediation effort; and (2) outline the

Brownfield Partners-planned remaining remediation activities for the UPC property and an adjacent portion of the former Southern Pacific (SP) Brisbane Rail Yard property, including the latest proposed remediation schedule, proposed remediation approach. The description indicates that the remediation approach includes demolition of the existing buildings, evaluation of the effectiveness of the existing soil vapor extraction and treatment system, further characterization of key areas of the site, preparation and submittal of a remediation Feasibility Study, Combined Remediation Action Plan (RAP) and other remediation documents for DTSC approval; obtaining approval for and implementing the soil and groundwater remediation approach, and performing operation, maintenance and monitoring (O&M) activities as necessary following implementation of active remediation. Presumedly, if the DTSC ultimately requires a land use covenant similar to what is suggested in this comment, the approved remediation program would provide for such a covenant.

RC 3.03 (da Costa)

Hazards and Hazardous Materials--cumulative health and safety impacts--operations of Santa Fe not very far; you have petroleum tanks; we need to find out if we build thousands and thousands of homes, what will be the cumulative impact on the people that live here.

Response: DEIR chapter 11, Hazards and Hazardous Materials, provides a detailed description of known and potential hazards and hazardous materials conditions in the Project Area, related potentially significant adverse public health impacts anticipated as a result of the proposed project, and associated requirements for minimizing impacts. Consistent with CEQA, the chapter specifically addresses whether the project or its associated growth effects in redevelopment zones 1 and 2 would directly or indirectly (from CEQA Guidelines Appendix G, items VII (a-3)):

(1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

(2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

(3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

(4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment; or

(5) Impact implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

With regard to the operations of Santa Fe cited in this comment, the concern is apparently in reference to the multi-track Caltrain/Union Pacific rail corridor that traverses the eastern edge of the Project Area. The vast majority of train

passages along this corridor are Caltrain passenger trains. Nevertheless, potential hazards from spills of toxic and/or hazardous materials exist along this route. No UPRR program is in place to disseminate information regarding the frequency of hazardous cargos and the specific hazardous materials transported on this route. It therefore must be assumed that the UPRR may transport any chemical or other hazardous material product allowed by the U.S. Environmental Protection Agency, U.S. Department of Transportation (DOT) and State Department of Transportation (Caltrans) on this route. Transporters of hazardous materials, including the UPRR, are subject to the regulations imposed by these federal and state which have been established to minimize the risk due to accidental spill or release. The DOT regulates the transport of chemicals and hazardous materials by rail between states. Caltrans is the primary state agency charged with regulating and enforcing state and federal regulations pertaining to hazardous materials transport in California. These two agencies regulate railroad container types and design requirements.

Clean-up of hazardous materials spills is typically the responsibility of local emergency response agencies. The San Francisco Fire Department includes over 60 specially trained Hazardous Materials Specialists and a Hazardous Materials Response Unit that is outfitted with equipment for hazardous materials identification, assessment, protection, control and containment, and decontamination.[1]

Because UPRR compliance with existing state and federal regulations for transport of hazardous materials would minimize the risk of accidental release from rail transport operations, no significant adverse impact related to the transport of hazardous materials and wastes has been identified, and no additional mitigation has been required.

With regard to the nearby petroleum tanks cited in this comment, it is assumed that the reference is to an existing Brisbane Terminal ("tank farm") facility located at 950 Tunnel Road in Brisbane, approximately 5,550 feet (a little more than one mile) from the southern boundary of Visitacion Valley Redevelopment Area Zone 1, just west of U.S. 101. The Brisbane Terminal site is outside the approximately 500-foot radius ("buffer zone") of the Project Area within which a summary listing of all known (recorded) and regulated hazardous materials storage or handling sites is provided in DEIR Table 11.1; i.e., is not considered to be near the Project Area. In response to this comment, the following information on this facility has been collected from a California Regional Water Quality Control Board (CRWQCB) on the facility (CRWQCB, Cleanup Activity Fact Sheet: SFPP, L.P., Brisbane Terminal, 950 Tunnel Avenue, Brisbane; October, 2007):

The facility is located in a light-industrial area of Brisbane and is bordered by Tunnel Avenue to the east and south, Union Pacific Railroad tracks to the west, and the Brisbane Landfill to the north.

[1]San Francisco Fire Department; *Fire Facts;* www.sfgov.org/site/fire, accessed May 25, 2007.

The facility is a bulk petroleum storage and distribution terminal that provides aviation fuel to San Francisco airport as well as gasoline and diesel fuel to various retail stations. The facility was constructed in the 1960s and is currently owned and operated by SFPP, L.P.

The eastern portion of the facility is located upon the former Brisbane Municipal Landfill while the western portion, where 21 aboveground storage tanks (ASTs) reside, is situated on a bedrock outcrop. Gasoline, diesel, and aviation fuels are brought to the facility via pipeline and are stored in the ASTs. The gasoline and diesel fuel stored in the ASTs is pumped into tanker trucks via five loading racks at the facility for distribution to Bay Area gasoline stations. Aviation fuel is piped directly from the facility to San Francisco Airport.

Groundwater sampling is currently being conducted at the site twice per year. According to CRWQCB, cleanup activities conducted in response to historic spills have generally been successful in reducing petroleum fuel and fuel additive concentrations in the groundwater.

An extensive summary of previous investigations and cleanup activities is available in a remedial action plan (RAP), dated June 29, 2007, and a Monitored Natural Attenuation (MNA) report dated December 15, 2006. Both reports are available at the Brisbane Library and online (see website below).

A screening-level risk assessment presented in the RAP found that current facility conditions are protective of human health and the environment. Groundwater monitoring data indicate that natural processes are reducing the concentrations of petroleum fuel and fuel additives in soil and groundwater beneath the facility. Therefore, the RAP proposes a MNA as the site-wide cleanup strategy. MNA relies on periodic sampling of effected media to demonstrate continued cleanup progress. The 2006 MNA report and the 2007 RAP report provide the lines of evidence to support this proposed approach.

Based on this CRWQCB-provided information, it has been determined that the Brisbane "tank farm" facility and associated transport activities do not represent a significant health and safety hazard for the proposed Project.

LR 1.03 (DTSC) Hazards and Hazardous Materials--draft Remedial Action Plan (RAP) cannot be finalized until results are available from pilot study now underway for the groundwater in the DTSC project area--DEIR page 11-6, parag. 2, states that DTSC has not yet received a revised Draft RAP. OPEA suggests that a brief status statement be included to state that a pilot study for the groundwater in the DTSC project area is underway and that the Draft RAP cannot be finalized until those results are available; including this information here will inform reader as to why the RAP has not yet been finalized.

Response: The DTSC-recommended brief sentence regarding the pilot study for groundwater has been added to DEIR page 11-6, paragraph 2, which now states: *A pilot study for the groundwater in the DTSC project area is underway. The Draft RAP cannot be finalized until those results are*

available. This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.04 (DTSC) Hazards and Hazardous Materials--anticipated future soil and groundwater remediation activities--additional wording recommended for page 11-9, section (e), as last paragraph--pertaining to Remediation Planning and the Health and Safety Plan and Transportation Plan (what they will include, etc.).

Response: The DTSC-recommended additional wording pertaining to Remediation Planning has been added to DEIR page 11-9, section (e), as the last paragraph, which now reads: *Remediation planning will include the following plans and measures: utility clearance, security measures, waste management, a Health and Safety Plan, a Soil Sampling Plan, treatment and excavation plans, a dust control plan, an air monitoring plan and a Transportation Plan. These plans and measures would be in-place and undertaken to prevent the creation of significant hazards to the public and the environment. The Health and Safety Plan and Transportation Plan will include contingency/emergency information, in case of a foreseeable upset and accident. Preparation of the Health and Safety Plan component will serve to protect workers during all remediation and construction activities. Following DTSC approval of the RAP, remediation and removal work would be conducted in accordance with applicable OSHA worker safety regulations. The handling, transport, and storage of any hazardous waste or potentially hazardous waste would be conducted in accordance with applicable laws and regulations.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document. Please also see response to comment LR 1.09 in section 2.2.3 (Land Use) herein.

LR 1.05 (DTSC) Hazards and Hazardous Materials--sensitive nearby land uses--additional wording recommended for insert on DEIR page 11-11, section (h), regarding notification requirements if hazardous materials/wastes are to be handled within one quarter mile of any existing or proposed school.

Response: The DTSC-recommended additional wording pertaining to notification requirements has been added to DEIR page 11-11, as section (h), which now reads: *(h) Sensitive Nearby Land Uses. Numerous preschools, elementary and middle schools, childcare centers, and senior centers are located within one mile of Redevelopment Zone 1. If hazardous materials/waste would be handled within a quarter mile of any existing or proposed school, notification to the schools would be required to occur in accordance with Title 14, California Code of Regulations, Section 15168.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.06 (DTSC) Hazards and Hazardous Materials--potential impacts due to accidental releases--wording deletion recommended for DEIR page 11-27, second to last paragraph: delete last sentence.

Response: The DTSC-recommended deletion of the last sentence in the second to the last paragraph on DEIR page 11-27 has been done; the paragraph now reads: ***Potential Impacts Due to Accidental Release of Hazardous Materials or Wastes During Normal Transport Operations--Entire Project Area.*** *The proposed Project could result in the use and disposal of hazardous materials in the Project Area, which in turn could increase the potential for transportation-related accidents along the routes where these hazardous materials are transported. Transport routes would include internal new roads in Zone 1, Bayshore Boulevard, and U.S. 101 via the Bayshore Boulevard, Harney Avenue and Beatty Avenue/Alana Way interchanges. Transporters of hazardous materials and wastes are subject to local, state, and federal regulations, which would minimize the risk; however, the potential would always remain for an accidental release of hazardous materials or wastes, which could then result in a potential impact on public health or the environment.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.07 (DTSC) Hazards and Hazardous Materials--potential impacts due to accidental releases--DEIR pages 11-27/11-28--DEIR should include possible truck routes for transporting contaminated soils for Zones 1 and 2 trucks within the discussion on pages 11-27 through 11-28.

Response: A description of possible truck routes for transporting contaminated soils for Zones 1 and 2 has been added to the cited paragraph on DEIR page 11-27. The revised version of this DEIR paragraph is shown in italics in the response to comment LR 1.06 above.

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.08 (DTSC) Hazards and Hazardous Materials--hydrology and water quality--DEIR page 11-20, section 11.2.6(d): wording recommended for insertion at end of this section.

Response: The wording recommended by DTSC has been inserted at the end of section 11.2.6(d) on DEIR page 11-20, which now reads: *The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits and associated Storm Water Pollution Prevent Plan (SWPPP) requirements and regulates leaking underground storage tanks and other sources of groundwater contamination.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.10 (DTSC) Hazards and Hazardous Materials/Transportation and Circulation--remediation period traffic pattern analysis recommended--DTSC recommends that a traffic pattern analysis be considered to determine if traffic conditions during remediation activities could result in a significant impact.

Response: DEIR on page DEIR page 11-21 states that the proposed remediation under consideration by DTSC will include measures to ensure safe transport and disposal of contaminated soil and groundwater. The proposed remediation program now being finalized by Brownfield Partners in consultation with the DTSC (see response above to comment LR 1.06, and Appendix 4.4, Remediation Status Update for Redevelopment Zone 1, at the back of this FEIR document) will be required by DTSC to include this traffic pattern analysis and will comply with the hazardous materials transport procedures of San Francisco and San Mateo County.

LR 3.13 (Brisbane) Hazards and Hazardous Materials--Transportation Plan review--Brisbane requests that any Transportation Plan for hauling hazardous waters and/or grading cut/fill material on Brisbane streets be subject to Brisbane review and approval (DEIR pages 11-27 and 11-28).

Response: As indicated in response to comment LR 3.02 on FEIR p. 3-4, the Agency and Planning Department intend to continue to properly notify and consult with the City of Brisbane regarding discretionary planning activities that may significantly affect the City of Brisbane, including any Project Area-related proposed hazardous materials remediation transport plan involving Brisbane streets. Please also see response to related comment LR 1.10.

LR 10.08 (Cincotta) Hazards and Hazardous Materials--mitigation--other mitigation approaches are more appropriate--there are other more appropriate documents that Redevelopment Agency should consider for identification of sustainable mitigation measures, and such measures should be described as goals rather than required mitigation measures.

Response: There are many examples of best management storm water practices that have implemented on brownfield sites, including locally. In the event that retention/detention measures described in the Mitigation Measure are not appropriate for the specific conditions found in Zone 1, the project sponsors would be required to identify alternative measures that achieve equivalent levels of runoff reduction and treatment for approval by SFPUC and the Department of Public Works.

Please also see response to comment LR 1.09 in previous section 2.2.3, Land Use.

LR 10.09 (Cincotta) Hazards and Hazardous Materials--mitigation--UPC prepared to consider mitigations which are consistent with conditions and with the remediation plan ultimately approved by DTSC--other mitigation approaches more appropriate--UPC prepared to consider sustainable design features, such as retention and detention facilities and pervious surfaces in its development as may be possible and are consistent with DTSC-approved remediation plan; however, totally inappropriate for DEIR to include such a speculative mitigation measure for an impact that has not been clearly demonstrated.

Response: Please see response to comment LR 1.09 in previous section 2.2.3, Land Use.

2.2.10 Hydrology and Water Quality

LR 3.14 (Brisbane) Hydrology and Water Quality--final drainage plan--re: DEIR page 12-5, project final drainage plan should ensure that no stormwater is diverted to other municipalities without consent.

Response: Section 1101.1.1 of the San Francisco Amendments to the California Plumbing Code requires that storm water runoff from all areas larger than 200 square feet must drain to the City sewer system or to a City storm drain system (there are no storm drain-only facilities in the project vicinity). Drainage from areas smaller than 200 square feet may be contained within a property's boundary, with no outlet, so long as it does not result in a nuisance (such as standing water that could breed mosquitoes). As these provisions make clear, discharge of runoff from the proposed redevelopment site into the City of Brisbane is already prohibited by the City's Plumbing Code, so the small amount of overland drainage that may now cross the boundary of the Schlage property into Brisbane would have to be contained and redirected on-site at the time of development.

LR 3.15 (Brisbane) Hydrology and Water Quality--Sunnydale sewer tunnel assumption--DEIR findings based on assumed construction of new Sunnydale sewer tunnel, but no mitigation in DEIR requiring completion of tunnel prior to project implementation; please clarify.

Response: The mitigating effects of the proposed Sunnydale sewer tunnel were noted as a potential offset to minor project-related impacts that *could* result if assumptions made in the DEIR about existing and proposed runoff conditions were incorrect. It is acknowledged the tunnel may never be built, or its construction could be substantially delayed. However, the discussion on DEIR page 12-12 indicates these speculative impacts would only result in "small increases in existing runoff rates." As a result, the increases themselves would be less than significant, and it is fully expected they would be completely offset by reductions in runoff within Zone 1, with or without the new sewer tunnel.

LR 10.06 (Cincotta) Hydrology and Water Quality--possible DEIR inconsistency regarding runoff--under Impact 12-1, DEIR identifies potential water quality impact due to increased storm water runoff; however, DEIR page 12-12 states that project and design features in D4D would actually reduce runoff coefficient.

Response: Existing combined sewer overflows are primarily caused by excess storm water runoff that enters the system, so all properties within the Sunnydale Basin contribute to overflows that adversely affect water quality in SF Bay. As such, this effect represents an existing cumulative impact that can be addressed either globally through construction of facilities such as the Harney Way box/storage culvert, or incrementally through the creation of retention/ detention storage on individual properties. San Francisco continues to invest in global infrastructure improvements (such as the proposed Sunnydale sewer tunnel), but in order to further reduce overflows and protect Bay water quality, emphasis is now shifting to controlling inflow to

the system. In general, this can be most efficiently and effectively accomplished at the time of new development or redevelopment. Accordingly, even if the SFPUC does not adopt and implement the proposed storm water regulations outlined in the DEIR, the project should be required to mitigate its existing contribution to sewer system overflows, utilizing site design and runoff control best management practices designed to achieve specific goals identified by SFPUC and DPW. In addition, San Francisco's new Green Building Ordinance, signed into law on August 4, 2008, includes new storm water reduction targets and requirements for individual development projects.

LR 10.07 (Cincotta)

Hydrology and Water Quality--mitigation--proposed retention facility measure should be eliminated--Mitigation 12-1 calls for retention and other measures to achieve at least 80 percent total annual runoff and 25 percent of surface to be pervious--these measures are included to mitigate an impact that is not clearly demonstrated--to comply with regulations that have not been adopted--highly speculative and inappropriate to include in DEIR; also, remediation program for Zone 1 that has been approved by insurance carrier and is being prepared in consultation with DTSC will not permit water retention facilities if such facilities require significant changes in existing grading plan and excavation program; guidelines cited in footnote were not prepared for a brownfield site such as Zone 1; this mitigation should be eliminated.

Response: The cited mitigation measure was proposed not simply to comply with the SFPUC's anticipated regulatory changes, but also to bring the largest (Zone 1) portion of the redevelopment project area into compliance with existing federal requirements governing the quality of storm water runoff. These requirements are applied not only to *new* development but also to *redevelopment* projects. The mitigation measure's recommended capture and treatment of 80 percent of total annual storm water runoff prior to discharge is consistent with best management practices applied throughout the Bay Area and California to meet water quality goals.

The pervious surfaces within all building setbacks do not necessarily lead to increased groundwater infiltration, but can simply serve to slow rain water transport into the City's wastewater system. Nevertheless, the DEIR Mitigation 12-1 recommended 25 percent pervious setback requirement would serve to further protect water quality, not by providing additional treatment, but by decreasing the total volume of runoff during heavy rains. Although the SFPUC has not finalized the regulations needed to achieve this goal, this project still has the responsibility to address its expected contribution to a cumulative, City-wide direct discharge impact.

It is additionally noted that, although preliminary calculations presented in the DEIR indicated that Zone 1, as currently designed, would reduce peak storm water discharges from the project site, the project would significantly increase existing wastewater flows. Since storm runoff and wastewater are carried by a common system, the increase in wastewater would largely offset any reductions in runoff achieved by the site's redevelopment. This projected balancing of flows highlights the need to further reduce Zone 1's total volume

of storm water runoff, through measures such as the recommended 25 percent pervious setback requirement, as part of City-wide efforts to reduce direct wastewater discharges.

2.2.11 Noise

LR 12.13 (DPH)

Noise--structural attenuation--DEIR page 13-4, subsection n(b)--provide references for the factors cited for typical building construction noise attenuation of 20-25 dBA with windows closed.

Response: The HUD *Noise Guidebook* is one source. *The Noise Guidebook*, U.S. Department of Housing and Urban Development, page 6 states "HUD's regulations do not contain standards for interior noise levels. Further, a goal of 45 decibels is set forth and attenuation requirements are geared towards achieving that goal. It is assumed that with standard construction any building will provide sufficient attenuation so that if the exterior level is 65 L_{dn} or less, the interior level will be 45 L_{dn} or less." Hence, 20 dB attenuation is assumed in the DEIR for any new building.

Highway Traffic Noise Analysis and Abatement Policy and Guidance, U.S. Department of Transportation Federal Highway Administration, June 1995, Table 7 (page 10) is another source. Light frame buildings with ordinary sash windows are shown to have a building noise reduction of 20 dB, and 25 dB with storm windows. In California, the state's energy and noise insulation standards have resulted in standard construction superior to construction assumed in the early 1980's. Numerous detailed analyses of actual building plans and measurements of finished buildings by Illingworth & Rodkin, the EIR noise consultant, demonstrate that standard California construction provides sound insulation in the 20-25 dBA range.

LR 12.14 (DPH)

Noise--sleep disturbance--general information provided regarding sleep disturbance as an effect of noise for possible insert on DEIR page 13-4.

Response: Field and laboratory studies have shown that transportation noise can disturb sleep. This is a complex phenomenon. Research in the laboratory and research in the home environment have lead to different findings regarding noise induced sleep disturbance. This affect is further complicated because laboratory studies measure changes in sleep state, a more subtle affect than awakening. The World Health Organization recommends L_{max} levels of 45 dBA or less for intermittent sounds. Illingworth & Rodkin, the EIR noise consultant, has recommended L_{max} levels of 50 dBA or less in bedrooms and 55 dBA or less in other rooms based on various historical studies and guidance from the State Office of Noise Control, DOHS. A recent study on self-reported sleep disturbances due to railway noise found a substantial increase in reported effects when maximum intermittent noise levels were greater than 50 dBA inside the bedroom. The passby frequency

[1] "Self Reported Sleep Disturbances due to Railway Noise: Exposure – Response relationships for nighttime Equivalent and Maximum Noise Levels", Aaseang, Moum, and Engdahl, *Journal of the Acoustical Society of America*, July 2008.

of trains during the nighttime was shown to have an effect on reported sleep disturbances; the effect was different for difficulty falling asleep and for awakenings.[1]

LR 12.15 (DPH) Noise--sleep disturbance--area of site affected--DEIR data on existing conditions (DEIR page 13-22) indicate that short term and single event noise from Caltrain operations and Bayshore Blvd. traffic appear to create hazards for nighttime sleep disturbance and other health impacts associated with noise. It appears that existing noise sources could crate significant noise impacts for a greater share of the project's noise sensitive uses than indicated in DEIR. Both documented, verifiable attenuation factors [see comment 12.13] and short term noise levels should be used to identify impacted areas and mitigation requirements.

Response: As trains passed by noise monitoring site LT-1 noise levels typically reached a maximum (L_{max}) of 90-95 dBA. Intermittent maximum noise levels from vehicular traffic on Bayshore Boulevard generated similar L_{max} noise levels. Maximum instantaneous noise levels drop off with distance at the rate of about 6 dBA with each doubling of the distance from the source. Standard California construction provides 20-25 dBA of noise reduction. Therefore, at a distance of 500 feet from the roadway and railroad tracks where typical outdoor noise levels would be in the range of 70-75 dBA L_{max}, interior levels would range from 45-55 dBA. Buildings throughout most of the site could, therefore, potentially be exposed to excessive interior single-event noise levels as a result of railroad train passages and loud vehicle passages on Bayshore Boulevard.

LR 12.16 (DPH) Noise--mitigation--expansion of acoustical analysis requirement recommended--re: Mitigation 13-3 on DEIR page 13-23 (for potential new development noise exposure impacts)--areas needing mitigation likely encompass larger share of project area, as per comment 12.15.

Response: Single-event noise could potentially impact residential sleeping areas proposed throughout most of the Project Area. Shielding provided by buildings located along the railroad and Bayshore Boulevard corridors would likely provide substantial attenuation for the interior areas of the site. These measures could therefore be included as one of the "site planning techniques" called for under Mitigation 13-3.

LR 12.17 (DPH) Noise--mitigation--expansion of acoustical analysis requirement recommended--re: Mitigation 13-3 on DEIR page 13-23 (for potential new development noise exposure impact)--SFDPH supports DEIR acoustical analysis requirement, but states that requirement should be triggered by need to mitigate short term levels of 70 (as well as long-term levels) where noise occurs during normal sleep hours.

Response: See response to comments 12.15 and 12.16.

LR 12.18 (DPH) Noise--mitigation--use of Z-ducts discouraged--re: Mitigation 13-3 on DEIR page 13-23--where acoustical analysis requires AC systems to permit windows to remain closed, SFDPH discourages use of Z-ducts, especially

along busy roadways, "because of their potential to entrain outdoor pollution indoors."

Response: DEIR Mitigation 13-3, 2nd bullet, has been revised to state that the air circulation system shall be satisfactory to the City of San Francisco local building official, and "Z"-ducts are discouraged. See this revision to DEIR page 13-23 in section 43 Revisions to the Draft EIR, herein.

LR 12.19 (DPH) Noise--mitigation--pre-occupancy testing recommended--re: Mitigation 13-3 on DEIR page 13-23--SFDPH recommends simple requirement for pre-occupancy testing to ensure compliance with noise mitigation objectives.

Response: The following bullet has been added to Mitigation 13-3:

- *Pre-occupancy noise testing following a methodology satisfactory to San Francisco Department of Health shall be completed prior to occupancy to demonstrate compliance with noise mitigation objectives.*

See this revision to DEIR page 13-23 in section 3, Revisions to the Draft EIR, herein.

2.2.12 Public Services

RC 1.03 (Morine) Public Services--library--"minor issue"--EIR indicates that Visitacion Valley is going to get a new library; this was part of planning process before this redevelopment plan formulation program commenced; population-based library size determined before this EIR document was completed; EIR projection of 6,000 people for the neighborhood is "just a little bit inconsistent with what we had planned for our library--could staff look at and "clarify it down the road?"

Response: The new Visitacion Valley Branch library is currently in the design stage and is scheduled to open in 2010. The design program for the new library has been dictated by a number of factors, including the San Francisco Library Commission established budget for the Visitacion Valley branch library project, as well as projected new housing units and commercial development in Project Area Zone 1. Most San Francisco Public Library system branch libraries are 6,000 to 8,000 square feet, regardless of variations in branch library service area housing and population totals (Visitacion Valley Branch Library Proposition 14 Application Form, May 30, 2002, page 7).

LR 6.11 (Morine) Public Services--library services--square footage of site for new library is approx. 10,000; square footage of building itself is approx. 8,700 (DEIR page 14-16, second paragraph).

Response: Comment acknowledged. Early formulation of anticipated Project Area growth numbers for EIR purposes conservatively estimated the replacement library branch size at 10,000 square feet to be "safe." When subsequent more detailed planning for the new branch specified an 8,500 to

8,700 library floor area, the EIR authors elected to retain the original 10,000 square foot number in the interest of efficiency; it was determined that the 1,300 to 1,500 square-foot difference in library floor area would have no substantive effect on the DEIR impact and mitigation findings.

LR 6.12 (Morine) Public Services--library services--impacts and mitigations--increased demand for library services--current library based on erroneous population figures for Schlage Lock site; population underestimated; library not expected to be redesigned because of this, but EIR should not make erroneous statements that can be used to undermine future efforts to increase library capacity.

Response: Please see responses to related Comments PC 1.03 and LR 6.11 above, and similar comment LR 6.09 in subsection 3.2.4, Population and Housing comments, herein.

LR 12.20 (DPH) Public Services--police services--disagreement with DEIR conclusion that project would increase police service demands--SFDPH disagrees with DEIR page 14-3 statement that redevelopment of Schlage Lock property would necessarily increase overall demand for police services--density is not clearly related to crime in San Francisco (map provided); development of vacant, underutilized site and economic and social improvement in project area could reduce crime; overall, SFDPH agrees with DEIR conclusion that project would not have a significant adverse impact on the need for police protection.

Response: The DEIR discussion of project-related increases in police service demands is based on close and detailed consultation with appropriate San Francisco Police Department personnel. The comment is correct that the increased police service demand conclusion does not in this case translate into a significant physical environmental impact.

2.2.13 Utilities and Service Systems

LR 1.11 (DTSC) Utilities and Service Systems--existing and future water demand--has SFPUC demonstrated that current conservation practices reduce water demands by increments consistent with projections stated on DEIR page 15-4? Is there a supporting document for this?

Response: The projected changes in Average Water Use listed in the DEIR were derived from information presented in Table 2 and Table 8B of the City's 2005 Urban Water Management Plan (UMWP). Table 8B presents estimated water demand by sector from 2005 through 2030, based on the conclusions reached by a study titled *City and County of San Francisco Retail Water Demands and Conservation Potential* (M. Hannaford, P.E. & Hydroconsult, Inc., November, 2004). This study identified the reductions in water use expected to occur over time in response to two influences: already adopted plumbing code provisions that mandate the use of water conserving fixtures and appliances, and implementation of SFPUC-sponsored conservation incentive programs that were determined to be socially acceptable and economically achievable. The rate at which reductions were projected to occur was primarily based on assumptions regarding the rate at

which existing fixtures and appliances would be replaced with newer, water saving models. The SFPUC found the results of this study to be reasonable and compelling, and so utilized them in development of the City-wide water demand projections presented in its adopted UWMP.

It is noted that some information listed under Total Water Use in the water demand data presented in the DEIR were transposed at the time of publication. Under both the ***2005 (current)*** and ***2030 (projected)*** headings, the value for System losses should be 7.3 mgd, while the value for Construction, docks & shipping should be 0.2 mgd. This error does not change the totals listed for this column under either heading.

LR 1.12 (DTSC) Utilities and Service Systems--impacts and mitigation measures--water supply adequacy assurance--an explanation is needed on DEIR page 15-7 regarding how the cited SFPUC letter provides assurance from the water supplier that there is sufficient water supply for the project.

Response: The cited SFPUC letter states the proposed redevelopment program would not result in a major expansion of the City's water utility system. In other words, the program would not cause demand to exceed available water supplies or transmission capacities within the year 2030 planning horizon. The Agency was able to make this assessment because the level of development envisioned by the program had been accounted for in growth projections made by the City Planning Department and incorporated into the UWMP. When these projections were combined with the declining per capita water demands discussed in the previous response, the UWMP concluded the City's total water use (excluding groundwater) would increase by less than one half of one percent over existing, 2005 levels. As a result, since the SFPUC already had the demonstrated capacity to deliver this volume of water to the City, and since it had an adopted contingency plan for implementation in the event of a prolonged drought, continued growth over the next two decades would require neither additional supplies nor major expansion of the existing transmission/distribution system. This conclusion allowed the SFPUC to provide an "assurance" of water service for the proposed redevelopment program.

LR 1.13 (DTSC) Utilities and Service Systems--impacts and mitigation measures--existing wastewater collection and treatment--conclusion on DEIR page 15-8 does not appear to be well-supported that the project will only contribute wastewater to an inadequate combined wastewater/storm water system, while retaining/reusing storm water and that there is enough capacity for wastewater only.

Response: The discussion in DEIR section 15.2 only addressed the ability of the City's sewer system to carry dry weather wastewater flows. The system's inability to accommodate wastewater plus high rates of storm water runoff was addressed in DEIR section 12.3, Hydrology and Water Quality Impact and Mitigation Measures, where project-related sewer "overflow" impacts were identified (Impact 12-1 on DEIR page 12-12) and mitigation measures (Mitigations 12-1A and 12-1B on DEIR pages 12-14 through 12-14) were proposed. It is acknowledged that both wastewater and storm water runoff

contribute to these overflows, but it is estimated that the proposed project's peak wastewater flow rate would equal less than 5 percent of its combined wastewater/storm water discharge during a design storm event, and less than one half of one percent of the Sunnydale Basin's total storm water runoff during the same storm.[1] This estimate clearly illustrates that peak runoff volumes are much larger than wastewater volumes, and that far greater system-wide reductions can be achieved with a reduction in storm water runoff than with an equivalent percentage reduction in wastewater flow. In addition, it is more economically efficient and technologically feasible to reduce storm water runoff than it is to reduce wastewater flows. As a result, when assessing its sewer system, the SFPUC determines wastewater capacity on the basis of the much lower dry weather (wastewater only) flow rate, and considers all wet weather capacity shortfalls to be the result of excess storm water runoff. As a result, when assessing its sewer system, the SFPUC determines wastewater capacity on the basis of the much lower dry weather (wastewater only) flow rate, and considers all wet weather capacity shortfalls to be the result of excess storm water runoff. Consequently, the DEIR determined the local sewer system has adequate capacity for the project's *wastewater* flows.

LR 1.14 (DTSC) Utilities and Service Systems--wastewater service--impacts and mitigations--DEIR only discusses dry weather flows and wastewater; however CEQA thresholds of significance refer to whether new (or expansion of existing) storm water facilities may be necessary; the question is not answered here; there should be verification in DEIR that wastewater system has adequate capacity (see Initial Study prepared for this EIR).

Response: As discussed in the response to comment LR 1.13 above, storm water runoff is the principal cause of sewer system overflows. It is acknowledged, however, that the projected 300(+) percent increase in Project Area wastewater flows would incrementally worsen the severity and/or the duration of existing overflows. Accordingly, in order to ensure the potential wastewater impacts associated with the project are fully mitigated, it is recommended that the project be required to detain, at a minimum, a

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[1] Estimated existing wastewater flows within the project area: 49,708 gpd
Estimated increase in project area wastewater flows: 161,200 gpd
Total estimated project area wastewater flow: 210,908 gpd
Peak wastewater flow rate = 2.3 x avg. rate: 210,908 x 2.3 = 485,088 gpd = 0.75 cubic feet per second (cfs)

Total project area: 37.9 ac.
Estimated runoff coefficient for 16.3 ac. in Zone 1 = 0.66; for 21.6 ac. in Zone 2 = 0.77
Weighted runoff coefficient: [(16.3 x 0.66) + (21.6 x 0.77)] ÷ 37.9 = 0.72
Peak runoff rate for 1-year recurrence interval/60 minute duration storm: (37.9 ac.) x 0.68 x 0.4" rain/hour = 11.4 cfs
Peak wastewater flow as % of combined sewer discharge: 0.75 cfs ÷ (11.4 + 0.75) = 6.1 %

Total Sunnydale Basin = 717 ac; Estimated runoff coefficient = 0.70
Peak runoff rate for 1-year recurrence interval/60 minute duration storm = (717 ac.) x 0.7 x 0.4" rain/hour = 201 cfs
Project wastewater flow as % of total basin runoff = 0.75 cfs ÷ 201 = 0.37 %

volume of storm water runoff equivalent to the peak wastewater increase. Details of the detention facility design, such as the appropriate wastewater peaking factor and the minimum storm intensity/return frequency for which runoff would need to be detained, would be specified by SFPUC and the Department of Public Works. In addition, it is further recommended this requirement only apply in the event the project is not required to implement the site design and retention/detention storage mitigation measures described in Mitigation Measure 12-1A, since the SFPUC has determined the storm water regulations now under consideration would include sufficient offset for increases in wastewater flows resulting from future development or change in use.

2.2.14 CEQA-Required Assessment Conclusions

No comments received on this DEIR section.

2.2.15 Alternatives to the Proposed Project

RC 6.02 (Commissioner Swig) Alternatives--does the EIR recommend Alternative 2 as the project (referring to Draft EIR page 2-62, section 2.5.2, Conclusions: Environmentally Superior Alternative)?

Response: The DEIR does not recommend adoption of Alternative 2: Reduced Housing Development in Redevelopment; rather the DEIR simply indicates for CEQA compliance purposes that Alternative 2 is the "environmentally superior" alternative, meaning that among the range of six alternatives identified and evaluated, Alternative 2 in the aggregate appears to have the lowest degree of adverse environmental effects.[1] Given this DEIR conclusion, the CEQA-required written "findings" to be prepared after the EIR is certified (pursuant to CEQA section 15091, Findings) will need to include a brief explanation of the lead agency's (the Planning Department and Redevelopment Agency's) rationale that specific economic, legal, social, technological or other considerations make this or any of the other identified project alternatives infeasible.

RC 6.03 (Commissioner Swig) Alternatives--would a ranking of the various alternatives be appropriate in an EIR? Would like to know which alternatives are ranked number 2, 3, 4, 5 and 6, in terms of environmental impact.

Response: As indicated, during the public hearing, by Agency staff (S. Muraoka) in response to this comment, a ranking of alternatives from least to most environmentally superior is not required under CEQA (Guidelines section 15162.6, Consideration and Discussion of Alternatives), and would require a highly subjective "weighing" of importance among the various environmental topics evaluated in the EIR. However, Tables 17.2 (Alternatives Comparison to Proposed Project: Summary Overview) and

[1]The CEQA Guidelines (section 15126.6) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

17.7 (Trip Generation Comparison--Project vs. Project Alternatives) on DEIR pages 17-7 through 17-9 provide a topic-by-topic summary comparison.

RC 6.04 (Commissioner Swig)

Alternatives--how can Commissioners readily determine which alternatives would have the worst environmental impacts and which would have the least?--how would staff suggest that all of the various environmental considerations involved in considering each alternative be filtered effectively? How do we know for example that, arbitrarily, say Alternative 3 is slightly worse than the project while Alternative 5 by comparison might be significantly worse? How would staff suggest that the Commissioners consider the alternatives and understand which alternatives would have the worst environmental impacts and which would have the least? Looking for a ranking or a way to understand the comparative impacts of the alternatives more thoroughly.

Response: Please see response to related comments RC 6.02 and RC 6.03 herein.

RC 10.03 (Commission President Covington)

Alternatives--clarifications requested--what is meant by "reduced housing" alternative.

Response: The term "reduced housing alternative" is used in the DEIR in reference to DEIR-identified Alternative 2, Reduced Housing Development in Redevelopment Zone 1." Primarily as a means of reducing peak-period vehicular trip generation, this alternative would include a total of only 735 net new residential units in the Project Area as compared to a total of 1,585 net new residential units in the Project Area for the proposed Project. The result would be approximately 853 net fewer residential units in the Project Area. All other proposed development under the redevelopment program would remain the same for this Alternative 2 as for the proposed Project, which provides for up to 1,585 total residential units. See Table 17.1 on DEIR page 17-6 for a comparison of potential net new residential units between the "Reduced Housing" alternative (Alternative 2) and the proposed Project.

LR 4.02 (LPAB)

Alternatives--preservation alternative--LPAB feels that preservation alternative description could be more detailed, including how buildings could be re-used and how alternative would relate to housing needs, population and overall use of the plan area

Response: The level of detail in the DEIR discussion of "Alternative 4: Preservation and Re-Use of All Schlage Lock Plant 1 Buildings" has been governed by CEQA Guidelines section 15126.6(d) (Discussion and Consideration of Alternatives, which indicates that the EIR comparison of the impacts of the identified alternatives "is intended to be less detailed than the discussion of the impacts of the proposed project."[1] Following that guideline, the discussions in this chapter of the comparative impacts of the six identified alternatives to the proposed Project are intentionally less detailed than the

[1]CEQA Guidelines section 15126.6(d) states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

discussions in EIR chapters 5 through 15 of the significant impacts of the proposed Project.

The DEIR description of this preservation alternative does indicate on DEIR page 17-16 how the buildings could be re-used (as a community center), consistent with the previous suggestion of the LPAB), and does indicate on DEIR page 17-17 that, in comparison to the proposed Project, this preservation alternative would have "a reduced *beneficial effect"* in assisting San Francisco in achieving: (a) increased housing opportunity in the Visitacion Valley neighborhood; (b) a better citywide balance between employed residents and jobs; (c) more housing concentration near commercial uses, transit, and other services; and (d) associated decreases in the current in-commuting trend." Also, Table 17.1 on DEIR page 17-6 in the Alternatives chapter indicates that the preservation alternative would accommodate up to approximately 1,385 net additional residential units, versus 1,586 net additional residential units for the proposed Project, the same amount of retail space as the proposed Project, and would accommodate approximately 189,550 square feet of additional cultural/ institutional/educational floor space in comparison to the proposed Project.

However, reiterating what is explained on DEIR page 17-17 with regard to this building preservation and re-use alternative, according to DTSC,[1] this alternative could impede hazardous materials remediation because the Schlage Lock Plant 1 buildings, which would be preserved under the alternative, could have contaminated soils underneath them; any such soils would be more difficult to access and remediate.

LR 4.03 (LPAB) Alternatives--preservation alternative--LPAB recommends that preservation alternative be more realistic and implementable.

Response: The comment is in reference to DEIR identified "Alternative 4: Preservation and Re-Use of All Schlage Lock Plant 1 Buildings." The description of Alternative 1 in the DEIR is as intended to be exactly as suggested by the S. F. Landmarks Preservation Advisory Board (LPAB), which provided valuable ongoing input and assistance to the EIR authors towards preparation of the DEIR Cultural and Historical Resources chapter of the DEIR (DEIR chapter 10). The adaptive use suggested by the LPAB for Buildings B and C, a community center, was derived from input received during the extensive series of community workshops conducted for the program. The financial viability of such an alternative use has not been evaluated as part of the EIR. Other uses or combinations of uses that may have more economic viability than a community center could certainly also be considered in the future, after the EIR is certified, with no need for additional CEQA analysis, provided that their environmental implications are not substantially greater than described in the DEIR for the proposed Project.

CEQA Guidelines section 15126.6(b), Consideration and Discussion of Alternatives, states "the discussions of alternatives shall focus on alternatives

[1]Barbara J. Cook, P.E., Chief, Northern California Coastal Cleanup Operations Branch, State Department of Toxic Substances Control (DTSC); written communication, April 11, 2008.

to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project"...[in this case, effects on historic resources]..."even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

LR 4.04 (LPAB) Alternatives--preservation alternative--aesthetics--DEIR section 17.4.2(d) on p. 17-17 should indicate that preservation of historic buildings can have a beneficial aesthetics effect.

Response: Comment acknowledged. Table 17.2, Alternatives Comparison to the Proposed Project: Summary Overview, does indicate that Alternative 4, the Additional Building Preservation Alternative, would have reduced aesthetic impacts in comparison to the proposed Project, but this conclusion was not repeated in the section 17.4.2(d) text. In response to this comment, the text in this section on DEIR page 3-47 has been revised to indicate a comparatively "beneficial aesthetics effect" (see revised version of DEIR page 3-47 in section 4, Revisions to the Draft EIR).

LR 10.10 (Cincotta) Alternatives to the Proposed Action--DEIR expansion to address new increased housing and retail in Zone 1 requested--UPC is requesting that DEIR be expanded to include new alternative: Increased Housing Alternative in Redevelopment Zone 1; UPC has recently acquired Ingersoll Rand/ Schlage site; preliminary cost estimates suggest a higher density may be required in order to make project financially feasible--proposed increased housing alternative numbers: 1,848 units (versus 1,585 for proposed project) and 143,500 square feet of retail (versus 131,500 for proposed project), with no change in amount of "other commercial" eliminated and "cultural/ institutional/educational" added; proposed added alternative would increase proposed project only slightly. As DEIR is intended to serve as project EIR for Zone 1, DEIR should be able to adequately analyze this slight increase as a possible alternative.

Response: The project description that has been described and thoroughly analyzed in the DEIR, including the various land use (residential, retail, etc.) intensity totals and layout, represents the specific redevelopment program and associated Design for Development that was carefully formulated by the Planning Department and Redevelopment Agency following an extensive community workshop and Citizens Advisory Committee (CAC) process and in close consultation with the affected property owners, including Universal Paragon Corporation.

CEQA Guidelines section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, subsection (a), states that the specific purpose of, and limitation on, the consideration and discussion of alternatives to the proposed Project in a Draft EIR is to "describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the objectives of the project but would avoid or substantially lessen many of the significant effects of the project..." [underline added for emphasis]. CEQA Guidelines section 15126.6, subsections (b) and (c), repeat this concept, stating that the range of potential alternatives to the proposed project shall include those "which are capable of

avoiding or substantially lessening any significant effects of the project"; and subsection (f) on the "Rule of Reason," reinforces this CEQA-intended emphasis in the alternatives discussion on reducing impacts, stating that "the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" [underline added for emphasis]. It is therefore common CEQA practice in San Francisco and elsewhere to confine the DEIR identification and evaluation of alternatives to the proposed Project to those that would result in an avoidance or lessening of key identified key impacts of concern--i.e., to "mitigating" alternatives. The widely used *CEQA Deskbook, A Step-by-Step Guide on How to Comply with The California Environmental Quality Act, Second Edition*, by Bass et al., states "the discussion of alternatives must focus on those alternatives that are capable of avoiding or substantially lessening the significant effects of the project" (page 108) and "...the alternatives must be limited to ones that substantially lessen at least one or the significant effects of the project" (page 109) [underline added for emphasis]. The added more intensive development alternative suggested in this comment does not meet this criteria.

To introduce the new alternative suggested in this comment at this time in the CEQA process--i.e., after the DEIR has undergone public review but prior to certification--that represents a more intensive development program (a 16.6 percent increase in Zone 1 residential intensity and 9.1 increase in Zone 1 retail intensity), would serve no environmental impact mitigation purpose, as explained above, and would require more detailed re-analysis of comparative key impacts including land use, visual factors, transportation and circulation, air quality, hazards, noise and public services, which would add considerable time to the CEQA process. The added, more intensive development alternative would in the opinion of the EIR authors represent a substantial change in the EIR environmental information, after public notice has been given on the availability of the Draft EIR for public review, but before certification, that has not been subject to meaningful public comment. In the opinion of the EIR authors, this additional DEIR information would therefore require recirculation of the DEIR pursuant to CEQA Guidelines section 15088.5.

As explained in DEIR section 3.13, Intended Uses of the EIR, on DEIR page 3-41, this EIR has been prepared for use by the Board of Supervisors, Redevelopment Agency and Planning Commission in their consideration of future, individual public and private development projects proposed within the Project Area boundaries. Certification of the EIR as presently constituted does not preclude Universal Paragon from submitting a future development application which includes the development changes described in this comment. As explained in DEIR section 3.13, such a future application would be examined in the context of the baseline documentation contained in the certified EIR to determine whether additional more focused environmental documentation would be required.

2.2.16 Mitigation Monitoring and Reporting

LR 3.16 (Brisbane) Mitigation Monitoring and Reporting Plan--City of Brisbane requests opportunity to review MMRP as it pertains to measures directly involving Brisbane or otherwise regional in nature, such as calculation of "fair share" contributions.

Response: Comment is noted. San Francisco Planning Department and Redevelopment Agency staff will continue to consult with City of Brisbane staff regarding substantive project-related interjurisdictional matters, including any proposed fair share mitigation responsibilities affecting the City of Brisbane. Please also see response herein to comment LR 11.06, which describes the currently ongoing interjurisdictional Bi-County Transportation Study effort.

2.2.17 Organizations and Persons Contacted and EIR Consultant Team

RC 10.01 (Commission President Covington) Organizations and Person Contacted--need to add CAC membership list in this section (Draft EIR page 19-1); also a couple of names listed under City and County of San Francisco have changed; have their successors been included in the process?

Response: The requested revisions to DEIR page 19-1 have been made in response to this comment. Please see the revised version of DEIR page 19-1 in section 3, Revisions to the Draft EIR, herein.

2.2.18 Appendices

No comments received on this DEIR section.

2.2.19 General

RC 1.01 (Morine) General--EIR is a very thorough document; includes pretty much everything we need to know to make our decision as a community.

Response: Comment is noted; no further response is necessary.

RC 3.01 (da Costa) General--need for adequate community input--area being considered is the City's "last frontier' Draft EIR is the right time to involve the community in a meaningful discussion; can give the consultants or people who prepare the EIR all the money they need to create a thick document, but if you do not get needed input from the community, the Commission has failed.

Response: The Planning Department and Redevelopment Agency have provided and will continue to provide substantial opportunity for the public to participate and comment during the Visitacion Valley Redevelopment Plan adoption process. As noted on DEIR pages 1-6 through 1-8, since early 2000, the Board of Supervisors and Planning Department have been conducting a major community-based planning effort to re-examine land use

controls and consider other means of revitalizing the City's eastern neighborhoods.

Community Workshops. Residents, business and property owners, and other stakeholders in five eastern neighborhood districts where housing and industry co-mingle--Mission, South of Market, Showplace Square-Potrero-Central Waterfront, South Bayshore, and Visitacion Valley--have been taking part in an extensive series of Planning Department-conducted *community workshops* to determine the future character of their neighborhoods.

In 2002, within the context of its eastern neighborhoods planning effort, the Board of Supervisors directed the Planning Department to engage in a community-based planning process to formulate a vision for the future re-use of the vacant Schlage Lock property and other adjacent underutilized industrial lands in Visitacion Valley. In the Spring of 2002, after an intensive series of community workshops, the Planning Department released the *Visitacion Valley Schlage Lock Strategic Concept Plan* (the "Concept Plan").[1]

In 2004, the Mayor's Office of Workforce and Economic Development, in cooperation with local organizations and interest groups including Urban Solutions, the Bay Area Local Initiatives Support Corporation and Asian Neighborhood Design, and various neighborhood-based groups, conducted an additional series of four community workshops to discuss and "establish an identify and vision for the commercial district."[2] The workshops were held in the summer and fall of 2004, were attended by approximately 30 to 50 people, including local merchants, residents, community advocates and City officials,[3] and resulted in documentation[4] of a series of specific recommendations for enhancing the Leland Avenue and Bayshore Boulevard business corridor and promoting corridor business.

Following three more community workshops conducted between October 2005 and February 2006, the Planning Department and local community formulated a *Leland Avenue Street Design Project.*

Between August 2006 and August 2007, an additional series of community workshops was conducted for the Schlage site to finalize the vision for the property and to establish permanent controls for its redevelopment. Based on this community workshop input, the Planning Department in January 2008 released a draft set of development controls and design guidelines for the Project Area, entitled *Draft Visitacion Valley/Schlage Lock Design for Development* ("Design for Development").

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[1]EDAW, *Visitacion Valley/Schlage Lock Community Planning Workshop--Strategic Concept Plan and Workshop Summary*, prepared for the San Francisco Planning Department, July 2002.

[2]Urban Solutions, Local Initiatives Support Corporation, Asian Neighborhood Design, *Leland/Bayshore Commercial Revitalization*, 2005.

[3]Ibid.

[4]Ibid.

Additional community workshops have been conducted by the Planning Department between August 2007 and now to refine and implement the Design for Development.

Public Participation in EIR Preparation. The Visitacion Valley Redevelopment Program EIR has been prepared following the normal CEQA-based public consultation process conducted for all San Francisco EIR preparation programs.

Scoping Meeting. Pursuant to CEQA Guidelines section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the Redevelopment Agency conducted a public scoping meeting on February 26, 2007 at 10:00 AM, at One South Van Ness Avenue, Fifth Floor, Room 5080, where the views of adjacent jurisdictions, responsible agencies, and interested members of the public requesting notice, as to the appropriate scope and content of the EIR were solicited. Neighborhood representatives attended this scoping meeting and commented on the EIR scope and content.

Notice of Preparation. A Notice of Preparation (NOP) of a Draft EIR and companion Initial Study Checklist, dated January 31, 2007, were issued to interested and responsible agencies for a state-mandated 30-day review period (see EIR appendix 20.1).

As provided for in the CEQA Guidelines, the scope of the EIR has included all environmental issues to be resolved that are currently known to the Co-Lead Agencies (the Redevelopment Agency and Planning Department), including those issues and concerns identified as possibly significant at the February 26, 2007 scoping session, and by other interested agencies and individuals in response to the Notice of Preparation (NOP), and by interested parties who attended to February 26, 2007 EIR scoping meeting.

DEIR Public Hearings. Fully noticed public hearings on the Draft EIR have been conducted by the San Francisco Planning Commission on June 26, 2008 and by the San Francisco Redevelopment Agency on July 1, 2008.

Project Area Committee (PAC) Not Required. Section 33385 of the CRL requires the legislative body to form a Project Area Committee (PAC) for a proposed redevelopment plan or plan amendment if a substantial number of low-income persons or moderate-income persons, or both, reside within the project area, and the proposed redevelopment plan will contain authority for the Agency to exercise eminent domain over property on which any persons reside, or contains one or more public projects that will displace a substantial number of low-income persons or moderate-income persons, or both.

The Redevelopment Commission approved Resolution 129-2006 on September 19, 2006 stating that the Visitacion Valley Project Area does not require a PAC because the proposed Redevelopment Plan contains no proposals to exercise eminent domain over properties on which persons reside and does not include a public project that will displace residents.

Citizens Advisory Committee. Although establishment of a PAC was not required, in May 2006 the Mayor of San Francisco established an 18-member Visitacion Valley Citizens Advisory Committee (CAC) to advise the Redevelopment Agency and the City in their consideration of a Redevelopment Plan for the Project Area. The Visitacion Valley CAC includes residential property owners, business owners and community activities. The original CAC membership has undergone a number of changes since May 2006, as indicated by the listing of CAC membership on the revised version of DEIR chapter 19 in section 4, Revisions to the Draft EIR, herein.

The responsibilities of the CAC include reviewing policy documents and evaluating the need for and potential effectiveness of the Redevelopment Program. Since May 2006, the CAC has met monthly to review and discuss the Agency's progress, receive information from consultants and provide guidance throughout the process.

The Agency has received and will continue to receive public input regarding the proposed Redevelopment Plan through active involvement of the CAC and the public hearings described in this response.

To date, the CAC has reviewed and provided input on documents including the Existing Conditions Report, the Preliminary Report, drafts of the Redevelopment Plan, drafts of the Design for Development document, the Five Year Implementation Plan, tax increment projections, and the Draft Environmental Impact Report.

Section 33385.5 of the CRL requires the Agency to submit to the PAC copies of the Redevelopment Plan at least thirty days prior to the hearing by the legislative body. This requirement does not apply to the Visitacion Valley Project Area, as it is not required to have a PAC. However, the Agency did submit the Redevelopment Plan to the CAC thirty days prior to the hearing of the Redevelopment Commission. In March 2007, the CAC voted unanimously to endorse the goals and objectives of the Redevelopment Program. On October 14, 2008, the CAC recommended approval of the Redevelopment Plan.

Future Public Hearings. In addition to the public participation provided through the CAC, the Agency Commission and the Board of Supervisors will continue to consult and obtain the advice of property owners and occupants on the adoption of the Redevelopment Plan at their respective public hearings on the Redevelopment Plan. Per CRL Section 33349, the Agency will send a first class mailing containing the required notice of its public hearings to the last known assessee (the "property owner") of each parcel of land and to all tenants and business owners (occupants) within the Project Area. This notice will explain the purpose of the public hearing and contain other pertinent information such as the meeting dates, times and locations. The hearings of the Board of Supervisors are anticipated in early 2009.

Mailing List. The Planning Department and the Agency also maintain a 1,100 plus address mailing list used to notice every CAC meeting and planning workshop. This list includes all property owners in the Project Area. This mailing list is updated monthly with attendees at all meetings and new contact information collected at community events such as street fairs, community meetings and town hall meetings. The EIR notice was sent to this list as well as all addresses of property owners within a 300 foot radius of the Project Area Boundary. City staff will also use the 94134 zip code as a potential additional outreach mailing for future workshops and public hearings.

Please also see response to comment RC 9.01 which follows.

RC 4.01 (Landry) General--Redevelopment Agency priorities--state of black community--diminished to its worst condition ever; we don't want to see the City go bankrupt like Vallejo; economic hardship visible everywhere; scientists are saying that it's not a matter of if, but when an earthquake will happen; disaster hanging over our heads; "so, let's not take this lightly."

Response: Please see response to comment RC 3.01 above.

RC 5.01 (Evans) General--need for adequate community input--inadequate community input.

Response: Please see response to comment RC 3.01 above.

RC 7.01 (Commission Vice President Breed) General--community outreach urged--want to make sure in moving forward that there is more community outreach, that we send letters to the zip codes that will be vastly affected by this plan; and isn't there a CAC that has been working with the Agency on the Visitacion Valley project?

Response: Please see response to comment RC 3.01 above. As described in that response, more community outreach will be conducted by the Agency prior to Redevelopment Plan approval. Per CRL Section 33349, the Agency will send a first class mailing containing the required notice of its public hearings to the last known assessee (the "property owner") of each parcel of land and to all tenants and business owners (occupants) within the Project Area. This notice will explain the purpose of the public hearing and contain other pertinent information such as the meeting dates, times and locations. The hearings of the Board of Supervisors are anticipated in early 2009. As also described, there is a Mayor-appointed CAC that has been working with the Agency on the Visitacion Valley project, and the Planning Department and Redevelopment Agency maintain a 1,100-plus mailing list used to notice every CAC meeting and planning workshop. City staff will also use of the 94134 zip code as a potential additional outreach mailing for future workshops and public hearings.

RC 7.02 (Commission Vice President Breed) General--need for adequate community outreach--has Agency staff sent notices to all of the zip codes that will be affected by this particular project; and have the notices been in different languages?

Response: See response to PC 7.01 above.

RC 8.01 (Commission President Covington) General--need for adequate community outreach--in moving forward, must make sure that we are doing our due diligence in communicating the project to the community through their churches, organizations or other existing entities, and not forcing the community to come forward at the CAC or Commission level; must do what we can do to community what project will mean for the community because things will change.

Response: Pursuant to this and similar strong Commission directives, and associated San Francisco legislation, the Agency has been conducting and will continue to conduct an extensive program of community outreach for the proposed Visitacion Valley redevelopment program, as described in detail above in response to comments RC 3.01 and RC 7.01, above.

RC 9.01 (Commissioner Cheu) General--need for adequate community outreach--we should clarify for the public and our radio listeners that public review may continue through July 27th; if people have comments, they can either speak before commission or, alternatively, they can submit them in writing.

Response: In response to this and similar strong Commissioner directives and associated San Francisco legislation, the Agency has been conducting and will continue to conduct an extensive program of community outreach for this project, as explained in detail in response to comment RC 3.01 above. And as Commissioner Cheu suggests, if people have comments, they can either speak at the upcoming public hearings before the commission described in response to RC 3.01 or, alternatively, can submit comments to the Commission or Agency staff by telephone or in writing:

3.	**Contact Person and**	Tom Evans, Lead Planner
	Phone Numbers:	San Francisco Redevelopment Agency Telephone: (415) 749-2539 FAX: (415) 749-2524
	E-Mail:	Tom.Evans@sfgov.org
	Street Address:	1 South Van Ness Avenue, Fifth Floor
	City/State/Zip:	San Francisco, California 94103

RC 10.04 (Commission President Covington) General--can we receive fact sheet of presentation before Planning Commission and what Planning Commission vote was?

Response: Two members of the public commented, and three members of the Planning Commission commented on the item at the June 26, 2008 Planning Commission public hearing. The comments made and the responses to the EIR authors to those comments are presented in this FEIR Response to Comments document under comment codes PC 1.01 through PC 6.01.

LR 2.01 (SFDPH) General--Request from San Francisco Department of Public Health for two additional weeks after July 8, 2008 to review DEIR sections related to air quality, noise, hazardous materials, parks and pedestrian safety.

Response: This FEIR Responses to Comments document includes full consideration and responses to the comments on the DEIR submitted by the San Francisco Department of Public Health; in particular, this FEIR includes responses to letter LR 12 submitted to the Department to the Agency on August 1, 2008. Please see responses herein to comments LR 12.01 through LR 12.20.

LR 5.01 (OPR) General--State Clearinghouse has submitted DEIR to selected state agencies for review, review period has closed, and lead agency has complied with State Clearinghouse review requirements.

Response: Comment from OPR verifying CEQA compliance noted; no further written response is necessary.

2.2.20 Project Merits

PC 1.01 (Martin) Project Merits--we have worked for two years to get development at Schlage Lock; we are delighted that we now have a developer

Response: This comment pertains to the merits of the Project--i.e., the overall Visitacion Valley redevelopment program effort--rather than to the content or adequacy of the Draft EIR. All such comments received on the merits of the Project will be considered by the Planning Commission, Redevelopment Commission and other San Francisco decision-makers in their future deliberations and actions on the proposed Project, and do not require any further written response in this Final EIR.

PC 2.01 (Jackson) Project Merits--very strongly in support of this project.

Response: Please see response to similar comment PC 1.01 above.

PC 5.01 (Commissioner Moore) Project Merits--staff has done an excellent job in this area over the years, starting with neighborhood street improvements an now the planning for Schlage Lock--would like to acknowledge work done by so many people, including the Third Street light rail extension which has been a powerful piece in all of this--so, great job.

Response: Please see response to similar comment PC 1.01 above.

3. REVISIONS TO THE DRAFT EIR

The following section 3 includes all revisions to the Draft EIR text made in response to comments received during and immediately after the Draft EIR public review period. All text revisions are indicated by a bracket in the left margin next to the revised line(s). All of the revised pages in this section supersede the corresponding pages in the June 3, 2008 Draft EIR.

None of the criteria listed in *CEQA Guidelines* section 15088.5 (Recirculation of an EIR Prior to Certification) indicating the need for recirculation of the Draft EIR have been met as a result of the revisions which follow. In particular:

- no new significant environmental impact due to the Project or due to a new mitigation measure has been identified;
- no substantial increase in the severity of an environmental impact has been identified; and
- no additional feasible project alternative or mitigation measure considerably different from others previously analyzed in the Draft EIR has been identified that would clearly lessen the significant environmental impacts of the project.

the proposed redevelopment program and the potential environmental consequences of its approval.

1.2 EIR DEFINITIONS

Certain key terminology used in this EIR is listed and defined below and in Table 1.1.

1.2.1 Visitacion Valley Redevelopment Program Terms

(a) Project. The term "Visitacion Valley redevelopment program" and the CEQA term "Project" are used interchangeably in this EIR, and are defined to mean the proposed overall redevelopment program, including the proposed Redevelopment Plan, Design for Development, General Plan amendments, Planning Code changes, and all associated approvals, entitlements, and permits that may be required to implement the redevelopment program.

(b) Project Area. The term "Project Area" as used in this EIR is defined to mean the approximately 46-acre area within which the overall "Project" under CEQA would occur, which is the Visitacion Valley Survey Area boundary designated by the Board of Supervisors on June 7, 2005, and the proposed redevelopment project area to be established through Redevelopment Agency and Board of Supervisors adoption of the Redevelopment Plan.

(c) Redevelopment Plan. The term "Redevelopment Plan" as used in this EIR is defined to mean the proposed *Visitacion Valley Redevelopment Plan* which, pursuant to California Community Redevelopment Law, is intended to designate the Project Area as a redevelopment project area, and establish an associated redevelopment policy framework, state-authorized financial mechanisms, and land use and development regulations necessary to implement proposed economic and physical revitalization activities within the redevelopment project area.

(d) Redevelopment Zone 1 and 2. The largest consolidated portion of the Project Area consists of approximately 20 acres located east of Bayshore Boulevard encompassing the vacant Schlage Lock property, former Southern Pacific property, and other underutilized industrial properties. This primary opportunity area is referred to in the proposed Redevelopment Plan, Design for Development and this EIR as "Redevelopment Zone 1" (Zone 1). The remaining portion of the Project Area, located primarily on the west side of Bayshore Boulevard and comprised of commercial, light industrial, residential, and mixed use (commercial-residential) parcels fronting on the west side of Bayshore Boulevard and both sides of Leland Avenue, is referred to in the Redevelopment Plan, Design for Development and this EIR as "Redevelopment Zone 2" (Zone 2).

1.2.2 CEQA Terms

As stipulated by the state's *Guidelines for the California Environmental Quality Act* ("CEQA Guidelines"), this EIR identifies those adverse project environmental impacts that are expected to be "significant," and corresponding mitigation measures warranted to eliminate or reduce those impacts to less-than-significant levels. Where it is determined in this EIR that a particular impact cannot be mitigated to a less-than-significant level, the EIR identifies that impact as "unavoidable." Section 16.2 of this EIR (Unavoidable Significant Adverse Impacts) includes a summary list of all significant project impacts identified as "unavoidable." Identified significant

(6) the potential local and regional ***air quality*** and ***global climate change*** impacts associated with Project-facilitated development, including associated transportation activity and stationary energy use, construction activities and the Project-facilitated 2025 build-out scenario, based on the impact assessment guidelines of the California Governor's Office of Planning and Research and the modeling requirements of the Bay Area Air Quality Management District;

(7) the potential beneficial and adverse impacts of the Project on identified or possible ***cultural and historical resources*** in the Project Area, including the Schlage Lock property and other potentially significant properties;

(8) the potential ***hazards and hazardous materials*** exposure impacts of the Project, including possible construction period or long-term exposures to soil, groundwater and other contamination from past industrial activities, the status of current remediation efforts in the Project Area, and remaining mitigation (remediation) needs;

(9) the ***hydrology and water quality*** implications of the Project, including the capacity of the existing Project Area and off-site combined storm water/sanitary sewer system to handle Project-related increases in runoff rates and volumes, and the possible need for associated infrastructure improvements; and the potential for construction period and long-term impacts on water quality;

(10) the ***noise*** implications of Project-facilitated development, including construction noise impacts, the compatibility of anticipated new residential and other noise-sensitive development with existing Project vicinity noise sources (e.g., vehicular traffic on Bayshore Boulevard, transit activity, adjacent CalTrain line activity), and the noise impacts of Project-related traffic increases;

(11) the impacts of the Project on ***public services***, including police and fire protection, schools, parks and recreation, and library services; and

(12) the impacts of the Project on ***utilities and service systems***, including water service, sewer service, and solid waste disposal/recycling.

1.6 EIR ORGANIZATION AND CONTENT

The information in this EIR is generally organized under the headings listed above (Project Consistency with Local and Regional Plans, Land Use, Population and Housing, Visual Factors, etc.). For each of these environmental issues, the report describes:

(1) the existing setting;

(2) adopted plans, policies, and regulations ("regulatory framework") pertinent to the environmental topic;

(3) significant impacts anticipated with adoption and successful implementation of the proposed Project actions, and

(4) mitigation measures recommended to reduce or eliminate the anticipated significant impacts.

2. EXECUTIVE SUMMARY

This EIR chapter provides a summary of the proposed Visitacion Valley redevelopment program ("the Project") and its potential environmental consequences. The chapter includes a summary description of the proposed redevelopment program, a summary list of related environmental issues to be resolved, a summary identification of the associated significant environmental impact and mitigation findings of this EIR, and a summary of EIR-identified alternatives to the proposed Project and their comparative environmental effects.

This summary should not be relied upon for a thorough understanding of the Project and its individual impacts and mitigation needs. Please refer to chapter 3 of this EIR for a more complete description of the proposed Project, chapters 4 through 16 for a more complete description of associated impacts and mitigation needs, and chapter 17 for a more complete description of identified alternatives to the proposed Project and their comparative impacts.

2.1 PROPOSED PROJECT

The San Francisco Redevelopment Agency and City and County of San Francisco Planning Department are proposing to adopt and implement a redevelopment program, referred to in this EIR as the "Project," for an approximately 46-acre Project Area extending on both sides of Bayshore Boulevard roughly between Sunnydale Avenue and Blanken Avenue in the center of San Francisco's Visitacion Valley neighborhood. The Project is intended to facilitate re-use of the vacant Schlage Lock property along the east side of Bayshore Boulevard, revitalize other properties along both (east and west) sides of Bayshore Boulevard, and help revitalize the Leland Avenue commercial corridor.

Regional vehicular access to the Project Area is provided by U.S. Highway 101 (U.S. 101) via Bayshore Boulevard (the Bayshore Boulevard-Jamestown Avenue-3rd Street interchange). The Project Area is directly served by the recently completed Muni Third Street Light Rail (Muni Metro T line) system extension along the Bayshore Boulevard median, and by the recently relocated Caltrain Bayshore multi-modal transit station at the southeast corner of the area.

The largest consolidated portion of the Project Area, referred to in this EIR as "Redevelopment Zone 1," consists of approximately 20 acres located east of Bayshore Boulevard, bounded on the east by Tunnel Avenue and on the south by the city/county line, and encompassing the vacant Schlage Lock property, adjacent former Southern Pacific property, and other underutilized industrial properties. The remaining portion of the Project Area primarily on the west side of Bayshore Boulevard is referred to in this EIR as "Redevelopment Zone 2" and is comprised primarily of general commercial, light industrial, residential, and mixed use (commercial-residential) parcels fronting on Bayshore Boulevard, and neighborhood commercial, residential, and mixed use (commercial-residential) parcels fronting on both sides of Leland Avenue extending generally to Rutland Avenue.

Table 2.2
SUMMARY OF POTENTIAL NET NEW DEVELOPMENT UNDER THE PROJECT ALTERNATIVES VS. THE PROPOSED PROJECT

	Residential (units)	Retail (s.f.)	Other Commercial (s.f.)[1]	Cultural/Instit./ Educ. (s.f.)[2]
Proposed Project	1,585	131,500	(39,377)[3]	25,000
Alternative:				
1. No Project--Expected Growth	8	1,200	5,908	8,000
2. Reduced Housing in Redevelopment Zone 1	735	131,500	(39,377)	25,000
3. Stand-Alone Grocery Store/Retail	1,285	131,500	(39,377)	25,000
4. Add'l Bldg. Preserv. and Re-use	1,385	131,500	(39,377)	214,550
5. No Rezoning on Bayshore in Redevelopment Zone 2	1,495	131,500	(39,377)	25,000
6. No Redevelopment Plan	1,190	98,625	(39,377)	10,000

SOURCE: San Francisco Redevelopment Agency, San Francisco Planning Department, Wagstaff and Associates; January and May, 2008.

[1] "Other Commercial" includes medical/dental office facilities; offices; and production, distribution, and repair uses (including auto-related).

[2] "Cultural/Institutional/Educational" includes community centers and libraries.

[3] Projected reduction in "Other Commercial" floor area reflects Project intent to facilitate a transition in Project Area commercial use from general commercial to neighborhood-serving retail.

2.5.2 Conclusions: Environmentally Superior Alternative

CEQA Guidelines (section 15126[e][2]) stipulates, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The comparison of alternatives in chapter 17 of this EIR indicates that, of the various alternatives evaluated in this EIR other than the No Project--Expected Growth Without the Project alternative, ***Alternative 2: Reduced Housing Development in Redevelopment Zone 1***, would result in the least adverse combination of environmental impacts. This conclusion is based on the following information:

(1) Alternative 2 would result in substantially reduced ***quantitative impacts*** in comparison to the Proposed Project and the other alternatives (other than "No Project") (e.g., traffic generation, air pollution emissions, traffic noise) due to its reduced potential residential development;

3. PROJECT DESCRIPTION

This EIR chapter describes the proposed actions or "Project" addressed in this EIR. As stipulated by the CEQA Guidelines, the project description has been detailed to the extent needed for evaluation and review of environmental impacts. In accordance with section 15124 (Project Description) of the CEQA Guidelines, this chapter describes (a) the location and boundaries of the proposed Visitacion Valley redevelopment project area, (b) the basic objectives sought by the proposed redevelopment program, (c) the redevelopment program components and actions proposed to achieve these objectives, (d) the Project-related "future growth scenario" and environmental assessment time frame assumed throughout this EIR, (e) the official approvals required to implement the Project, and (f) the intended uses of this EIR.

Please refer to Table 1.1, Definitions of Key EIR terminology, in chapter 1 (Introduction) of this EIR for definitions of certain key terminology used in this and other chapters of this EIR.

3.1 PROJECT OVERVIEW

The Redevelopment Agency and Planning Department are proposing to adopt and implement a redevelopment program for San Francisco's Visitacion Valley neighborhood to overcome adverse blighting influences, clean-up and re-use vacant industrial parcels, facilitate housing development near transit , and provide improved neighborhood-serving commercial facilities in Visitacion Valley. The proposed redevelopment program--i.e., the "Project"--includes adoption and implementation of the proposed Redevelopment Plan, Design for Development, General Plan Planning Code map amendments, and other actions to facilitate re-use of the vacant Schlage Lock property and adjacent underutilized industrial properties on the east side of Bayshore Boulevard, and revitalization of properties fronting on the west side of Bayshore Boulevard opposite the Schlage Lock property and properties along the adjacent Leland Avenue commercial corridor. Other Project implementation documents anticipated for Zone 1 in conformity with the Redevelopment Plan, Design for Development, General Plan amendments, and Planning Code changes include a streetscape and open space plan, infrastructure plan, and master Owner Participation Agreement(s).

3.2 PROJECT LOCATION

3.2.1 Regional and Local Setting

The Project Area is located in the southeastern area of the City and County of San Francisco in the neighborhood of Visitacion Valley. The location of the Project Area within San Francisco and the Visitacion Valley neighborhood is illustrated by Figures 3.1 through 3.3.

Regional vehicular access to the Project Area is provided by U.S. Highway 101 (U.S. 101) via nearby northbound on- and off-ramps at Third Street/Bayshore Boulevard, Harney Avenue and

Sierra Point Parkway, and nearby southbound on- and off-ramps at San Bruno Avenue/Mansell Street, Alana Way/Beatty Avenue, and Sierra Point Parkway. U.S. 101 extends generally in a north-south direction through the eastern part of the City, linking

- Provide technical assistance to low- and moderate-income homeowner households purchasing new ownership units within Project Area.

- Facilitate the provision of homeownership opportunities to moderate-income residents with an emphasis on first time homeowners.

3.6.8 Anticipated Economic Development Program Activities

The January 2008 Preliminary Report also describes the following types of ***economic development program*** implementation activities anticipated by the Agency with adoption of the Redevelopment Plan to carry out the associated goals and objectives of the plan:

Planning and Development:

- Develop design guidelines to promote improved retail spaces and provide positive contributions to the Project Area. Facilitate design guideline implementation by the San Francisco Planning Department.

Site Preparation and Development:

- Provide assistance to land owners in assessing potential hazardous materials on brownfield sites, particularly the Concept Plan Sub-area site [Zone 1]. Assist in mapping and subdivision as well as planning and/or remediation of hazardous materials and contaminants.

- Provide assistance in the removal of unsafe, hazardous buildings or other unsafe, hazardous structures, such as those at the Schlage Lock facility.

Economic Revitalization:

- Encourage revitalization of existing businesses and vacant commercial space by providing technical assistance in collaboration with other City agencies and community-based organizations.

- Develop a program to link business tenants with available space and facilitate the flow of information on leasable space to merchants, property owners and residents in order to encourage business attraction and expansion.

- Develop a façade design and tenant improvement program for existing businesses along Leland Avenue and Bayshore Boulevard.

- Support the efforts of organizations such as the Visitacion Valley Business Outreach & Opportunity Merchants (VVBOOM) to revitalize the central shopping district (Leland Ave and Bayshore Blvd) through street festivals, community marketing campaigns, and neighborhood safety initiatives.

- Develop local hiring and equal opportunity programs, particularly focusing on new construction, professional services and retail jobs.

- Facilitate community efforts to increase the availability of neighborhood serving retail, particularly the attraction of a full-service grocery store.

- Provide assistance for preservation of historic structures and lead abatement.

- Ensure a relationship between new stores in the Concept Plan Sub-area [Zone 1] and the existing retail corridor on Leland Avenue in order to revitalize the central shopping district.

- Investigate options for funding merchant efforts and physical improvements, such as stronger merchants associations and the creation of a Community Benefits District and/or an assessment district. Provide assistance with implementation of the selected option(s).

3.6.9 Anticipated Community Enhancement Program Activities

The January 2008 Preliminary Report also describes the following types of ***community enhancement program*** implementation activities with adoption of the Redevelopment Plan to carry out the associated goals and objectives of the plan:

Public Infrastructure and Facilities:

- Carry out streetscape improvements for Leland Avenue, Bayshore Boulevard, and Tunnel Avenue including enhanced landscaping, lighting signage and traffic calming where needed.

- Facilitate the development of cultural, educational, and/or community facilities such as classroom space, library, daycare, job training centers, and community meeting rooms, particularly taking advantage of the old Schlage Office Building.

- Provide assistance to community and public art programs.

- Initiate a graffiti abatement, trash removal, and street and sidewalk cleaning program in the Program Area.

- Create space for street amenities such as pedestrian-scale lighting and trees by undergrounding power and telephone lines along Leland Avenue.

- Provide assistance for preservation of historic buildings and structures, including their rehabilitation and seismic strengthening.

- Assist community efforts to remove unsightly billboards in the Project Area.

- Assist in constructing new infrastructure in the Concept Plan Sub-area, emphasizing sustainable design.

Circulation:

- Provide new streets and pedestrian pathways to serve new development parcels in the Project Area.

- Develop pedestrian-oriented Streetscape Plans for new roadways on the Concept Plan Sub-area site [Zone 1] and facilitate improvements to existing streets.

- Assist City departments in implementing pedestrian and bicycle safety programs including street and sidewalk improvements, traffic calming projects and expansion or improvement of the local bicycle network.

- Identify the level of need, appropriate locations and key opportunities for innovative parking strategies.

- Improve the safety, pedestrian-orientation and look of Bayshore Boulevard through traffic calming and enhanced sidewalks.

- Develop and install signs and public art displays at the Leland/Bayshore intersection in order to establish it as a "gateway" to the neighborhood.

- Install "bulb-outs" at certain street corners to improve pedestrian safety and create space for sidewalk amenities such as plants, bicycle racks, and public art.

- Require Project Area developer fair share contribution to identified off-site local roadway system mitigation needs.

- Require Project Area developer fair share contribution to off-site regional roadway system funding needs that have been identified at the time, as part of future Owner Participation Agreements and/or other public improvement agreements between the Agency and developer, if and when feasible mitigations and/or improvement fair-share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, have been formulated through interjurisdictional study and cooperation, including the current interjurisdictional Bi-County Transportation Study effort. This requirement shall apply as a condition of approval for any Project Area residential development of 20 units or more, perhaps as part of the Visitacion Valley Community Facilities and Infrastructure Fee and Fund fair share mitigation requirement set forth in the Planning Code section 319.

Public Open Space:

- Assist with the construction of three new public parks on the Schlage Lock site.

- Provide assistance to the Department of Public Works in the construction of improved, landscaped street corridors.

- Develop family-oriented, pedestrian-friendly destinations for leisure and shopping, such as small plazas.

- Facilitate the Visitacion Valley Greenway Projects through efforts to extend the Visitacion Valley Greenway from Leland Avenue-McLaren Park through the Concept Plan Sub-area (Zone 1) to the Caltrain Station.

3.7 PROPOSED DESIGN FOR DEVELOPMENT

In January of 2008, following a series of community workshops conducted between August 2006 and August 2007, the Redevelopment Agency and Planning Department released a comprehensive draft set of proposed development controls and design guidelines for the Project

Area, entitled *Visitacion Valley/Schlage Lock Design for Development*[1] ("Design for Development"). The Design for Development is intended to be a companion document to the proposed Redevelopment Plan. The Design for Development contains specific development controls and design guidelines which incorporate, expand upon and refine the land use circulation and urban design concepts identified in the draft Redevelopment Plan, 2002 Concept Plan and 2006 *Leland Avenue Street Design Project*. The development controls and design concepts described in the Design for Development, in combination with the proposed underlying General Plan amendments and Planning Code changes, are intended to regulate future land use and development within the Project Area.

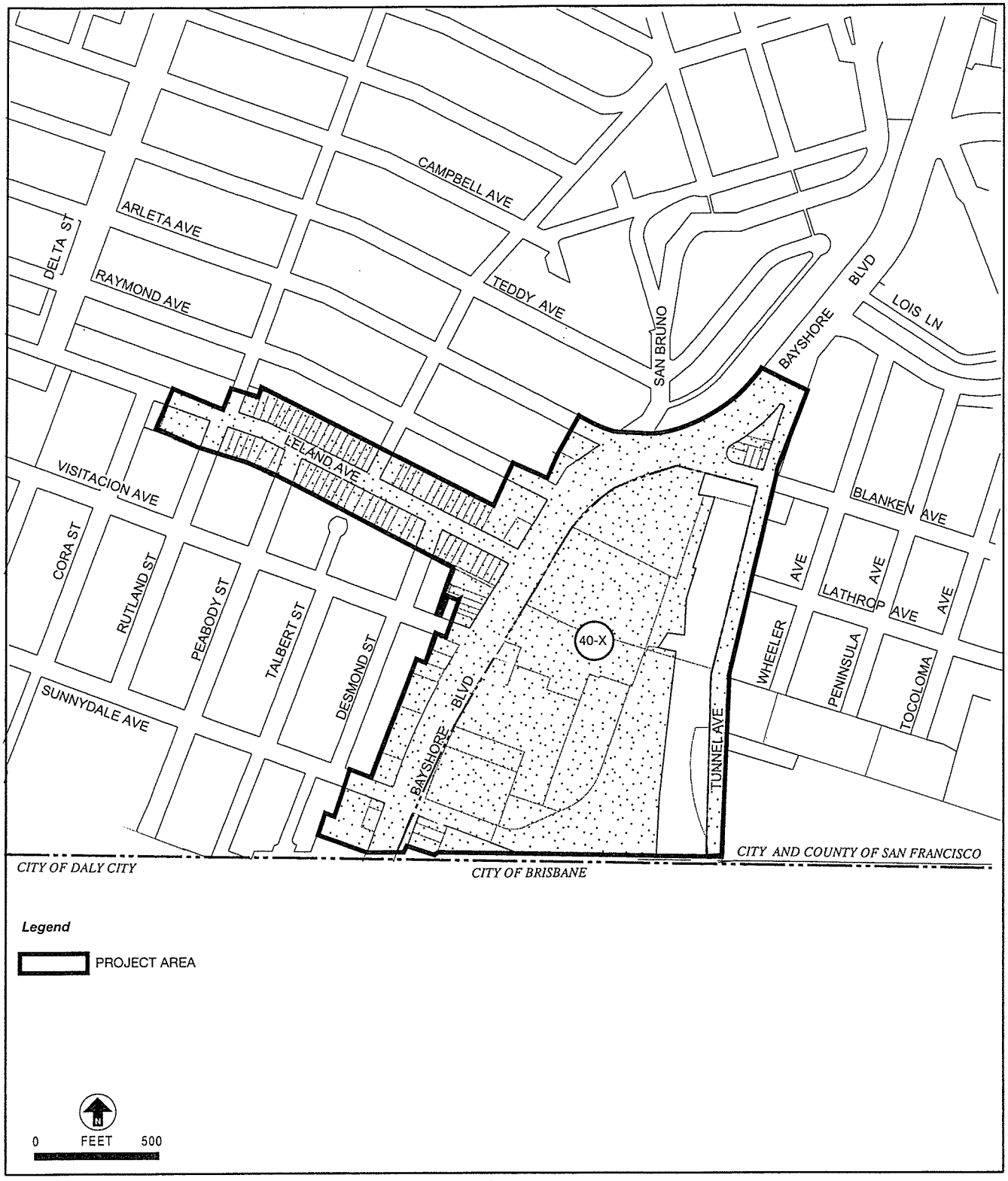
[1]San Francisco Planning Department and San Francisco Redevelopment Agency, *Visitacion Valley/ Schlage Lock Design for Development, Draft for Public Review*, January 2008 ("Design for Development").



SOURCE: Van Meter Williams Pollack

Figure 3.6

PROPOSED DESIGN FOR DEVELOPMENT "URBAN CONCEPT PLAN"



SOURCE: Redevelopment Agency

Figure 3.7

EXISTING BUILDING HEIGHT LIMITATIONS

development along the recently-completed Muni Metro T line extension and adjacent to the Caltrain Bayshore multi-modal transit station.

4.1.7 Air Quality Element

The *Air Quality Element* of the General Plan is composed of six sections, each of which focuses on different aspects of air quality improvement. Project consistency with relevant objectives and policies of the Air Quality Element concerning mobile source emissions and land use planning is discussed in chapter 9, Air Quality, of this EIR. In general, the proposed Project goals to increase transit access and enhance non-auto travel (see section 4.1.6 above) would reduce the degree of Project-related mobile source emissions increases.

4.1.8 Urban Design Element

The *Urban Design Element* of the General Plan addresses the physical character and environment of the City, including issues related to City Pattern, Conservation (including preservation), Major New Development, and Neighborhood Environment. The following objectives and policies of the *Urban Design Element* are also relevant to consideration of the proposed Visitacion Valley redevelopment program:

(a) Existing Height Designations. The *Urban Design Element* includes building height and bulk control policies for selected areas of the City. Map 4 of the *Urban Design Element*, entitled *Urban Design Guidelines for Height of Buildings*, designates the entire Project Area for a height range of 0-to-40 feet, as illustrated herein on Figure 3.7 (Existing Building Height Limitations).

(b) Proposed Height Designation Changes. Map 4 of the *Urban Design Element*, entitled *Urban Design Guidelines for Height of Buildings,* would be revised for Zone 1 to replace the existing allowable building height of 0-to-40 feet to the area-specific height allowances specified in the Design for Development and illustrated on Figure 3.8 (Proposed Building Height Limitations), which range from 40 to 85 feet (3 to 8 stories).

(c) Other Pertinent Objectives and Policies. The *Urban Design Element* also establishes the following additional objectives and policies pertinent to consideration of the proposed Project:

- *Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.* (Urban Design Element Objective 2)

- *Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.* (Urban Design Element Objective 2, Policy 2.4)

- *Moderation of major new developments to complement the City pattern, the resources to be conserved, and the neighborhood environment.* (Urban Design Element Objective 3)

- *Improvement of the neighborhood environment to increase personal safety, comfort, pride, and opportunity.* (Urban Design Element Objective 4)

- *Protect residential areas from the noise, pollution, and physical danger of excessive traffic.* (Urban Design Element Objective 4, Policy 4.1)

about 1.75. Thus, the number of jobs provided in the City is projected to keep pace with the number of employable City residents, as the total citywide population rises over the next 20 years.

6.1.3 Project Area Population and Housing Characteristics

(a) Existing. As shown in Table 6.2, the Project Area currently contains approximately 168 housing units, including approximately 3 in Zone 1 and 165 in Zone 2. Assuming an average household size of approximately 2.35 people per household in these housing units,[1] it is estimated that about 390 people currently live in the Project Area, including approximately 7 in Zone 1 and 383 in Zone 2. The residential density of the overall Project Area is currently approximately 3.7 units per acre. The residential density of the developed portion in Zone 2 is approximately 6.3 units per acre.

The population density of the overall Project Area is currently approximately 8.4 persons per acre. The population density of the developed portion in Zone 2 is approximately 14.5 persons per acre.[2]

(b) Projected. Joint Redevelopment Agency and Planning Department staff-derived projections of baseline population and housing growth characteristics in the Project Area without the Project are listed in Table 6.3. As shown, population and household totals within the Project Area between 2007 and 2025 without the Project are projected to increase to roughly 415 people and 176 households, a net 2007-2025 increase of 25 people and 8 households.

6.2 REGULATORY FRAMEWORK

6.2.1 Regional Housing Needs Determination

In order to respond to statewide population and household growth, and to ensure the availability of decent affordable housing for all income groups, the State enacted Government Code section 65584 in 1981, which requires each Council of Governments (COG) to periodically distribute State-identified housing needs to all jurisdictions within its region. The State Department of Housing and Community Development (HCD) is responsible for determining this regional need and for initiating the process by which each COG must then distribute its share of statewide need to all jurisdictions within its region. This statute requires development of a new Regional Housing Needs Assessment (RHNA) every five years. In March 2001, ABAG released its RHND for the June 2001-June 2005 planning period. ABAG is currently updating its RHND for the San Francisco Bay Area for the subsequent 2006-2011 planning period.

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[1]The average household size in San Francisco in 2005 was 2.35 according to ABAG *Projections 2007.*

[2]From Table 6.2 herein, the existing population of the approximately 46-acre Project Area is 385, resulting in a population density of 8.4 persons per acre; the existing population of the approximately 26-acre outside the Concept Plan area is 379, resulting in a population density of 14.5 persons per acre.

within the proposed on-site loading supply or within on-street loading zones, and if it would create potentially hazardous traffic conditions.

(m) Construction Period: Construction-related transportation and circulation impacts generally would not be considered significant due to their temporary and limited duration.

8.3.2 Projected Travel Demand

(a) Methodology/Approach. The San Francisco County Transportation Authority (SFCTA) countywide travel demand forecasting model (SFCTA Model) has been used in this analysis to develop the travel forecasts for the new development that would result with the Project, including person-trips by mode (auto, transit, walk, bicycle, and additional modes) and vehicle-trips, and has been used to develop the travel forecasts for the two analyzed 2025 Project plus Cumulative scenarios.

The SFCTA Model divides San Francisco into approximately 766 geographical areas, known as Transportation Analysis Zones (TAZs). The SFCTA Model also includes zones outside the City for which data is obtained from the current Metropolitan Transportation Commission (MTC) Model. For each TAZ, the SFCTA Model estimates the travel demand based on TAZ population and employment growth assumptions, determines the origin and destination and mode of travel (auto, transit, walk and bicycle) for each trip, and assigns those trips to the transportation system (roadway network and transit lines). The SFCTA Model output is developed on a weekday daily and 3-hour AM and PM period basis.

The SFCTA Model travel demand estimates incorporate the Association of Bay Area Governments (ABAG) land use and socio-economic database and growth forecasts for the year 2025 (*Projections 2004*), which provide forecasts of economic and population growth for the County of San Francisco, as well as for the remaining eight Bay Area counties. Within San Francisco, the San Francisco Planning Department is responsible for allocating ABAG's countywide growth is forecast to each SFCTA Model TAZ, based on existing zoning and approved plans, using an area's potential zoning capacity and the anticipated extent of redevelopment of existing uses.

However, these SFCTA Model projections do not specifically include several major developments currently pending (i.e., reasonably foreseeable) in the Project vicinity. Therefore, for the purposes of this EIR and other recent individual development traffic studies in the Project vicinity, the SFCTA Model was rerun in 2007 to add the following pending development plans into the future land use forecasts (consistent with Table 5.1, Substantive Cumulative Development Pending in the Project Vicinity--November 2007):

- Visitacion Valley redevelopment program (i.e., the Project);
- Executive Park (conversion of office space to residential, neighborhood-serving commercial, and community space);
- Candlestick Point (residential, regional-serving commercial, office, and 10,000-seat arena);
- India Basin Shoreline (residential, neighborhood-serving commercial, office, and hotel);

Impact 8-3: Project Queuing Impacts at Redevelopment Zone 1 Access Points. Under the proposed Design for Development, access to Redevelopment Zone 1 would be provided from Bayshore Boulevard via the three intersections at Leland Avenue, Visitacion Avenue, and Sunnydale Avenue. The existing southbound left-turn pocket length at the Bayshore Boulevard/Visitacion Avenue and Bayshore Boulevard/Sunnydale Avenue intersections are 100 feet. The Design for Development proposes introduction of a similar southbound left-turn pocket of 100 feet at the Bayshore Boulevard/Leland Avenue intersection. A queuing analysis performed for this EIR to evaluate the adequacy of these existing and added southbound left-turn pocket lengths indicates that:

- *AM Peak Hour:* The average southbound left-turn queue that would occur at each intersection could be accommodated within the 100-foot left-turn pocket lengths, but the maximum queue length could not be accommodated at the Bayshore Boulevard/Visitacion Avenue or Bayshore Boulevard/Sunnydale Avenue intersections.

- *PM Peak Hour:* The average southbound left-turn queue could not be accommodated within the Bayshore Boulevard/Visitacion Avenue or Bayshore Boulevard/Sunnydale Avenue left-turn pockets, and the maximum queue length could not be accommodated within the left-turn pockets at all three intersections.

Under these with-Project AM peak hour maximum queue length conditions and PM peak hour average and maximum queue length conditions, queues waiting to turn left might not be fully contained within the existing and proposed left-turn pockets. These queues would extend into the adjacent southbound travel lane, affecting through-traffic operations along southbound Bayshore Boulevard, and resulting in significant delays to vehicular and transit traffic. These possible Project-related queuing effects on local roadway and transit operations would represent a ***potentially significant impact*** (see criteria [a], [f], and [i] in subsection 8.3.1, "Significance Criteria," above).

Two types of queue length measurements have been estimated: the average queue and the 95th percentile queue. The average queue represents the length of the queue that would form if vehicles arrived at the intersection at an average, constant rate. The 95th percentile queue represents the theoretical maximum queue length and accounts for the actual, non-constant intersection arrival rates of vehicles. The typical turn pocket design standard is to have a pocket of sufficient length to accommodate the 95th percentile queue. The with-Project queuing analysis results are presented in Table 8.15.

Table 8.16
2025 CUMULATIVE INTERSECTION LEVEL OF SERVICE CONDITIONS

Intersection		Traffic Control	Weekday AM Peak Hour LOS	Weekday AM Peak Hour Delay[a]	Weekday PM Peak Hour LOS	Weekday PM Peak Hour Delay[a]
1	Bayshore Boulevard/Tunnel Avenue	Signalized	**E**	**77.6**	D	52.8
2	Bayshore Boulevard/Blanken Avenue	Signalized	**F**	**>80.0**	**F**	**>80.0**
3	Bayshore Boulevard/Arleta Avenue/San Bruno Avenue	Signalized	**F**	**>80.0**	**F**	**>80.0**
4	Bayshore Boulevard/Leland Avenue	Signalized	**F**	**>80.0**	**F**	**>80.0**
5	Bayshore Boulevard/ Visitacion Avenue	Signalized	**F**	**>80.0**	**F**	**>80.0**
6	Bayshore Boulevard/ Sunnydale Avenue	Signalized	**F**	**>80.0**	**F**	**>80.0**
7	Leland Avenue/Rutland Street	AWSC[b]	C (wb)	16.2	B (wb)	14.4
8	Tunnel Avenue/Blanken Avenue	AWSC[b]	**F (eb)[c]**	**>50.0**	**F (eb)[c]**	**>50.0**
9	Alana Way/Beatty Avenue	AWSC[b]	**F (eb)[c]**	**>50.0**	**F (eb)[c]**	**>50.0**
11	Thomas Mellon Drive/Harney[d] Way	Signalized	C	24.1	C	22.8
12	Harney Way/Alana Way[d]	Signalized	**F**	**>80.0**	**F**	**>80.0**

SOURCE: DMJM Harris/AECOM, 2007

Notes:
a) Delay in Seconds per vehicle.
b) AWSC – All Way Stop Controlled (Delay is reported for the worst approach).
c) Meets criteria for peak hour signal warrant; therefore considered to be unacceptable.
d) Reconfiguration of existing intersection 10--Alana Way/Harney Way/Thomas Mellon Drive, to create two intersections--intersection 11, Thomas Mellon Drive/Harney Way and intersection 12, Harney Way/Alana Way, is anticipated to occur by 2025 as part of the pending Executive Park Project.
Bold indicates unacceptable conditions.

Table 8.17
PROJECT'S CONTRIBUTION TO 2025 CUMULATIVE CONDITIONS--WEEKDAY AM PEAK HOUR

Location		Contribution to 2025 Cumulative Volumes[a]	Contribution to 2025 Cumulative Growth[b]	Contribution to 2025 Cumulative with Regional Improvements Volumes	Contribution to 2025 Cumulative with Regional Improvements Growth
U.S. 101 segments:					
1	Between I-280 and Third Street/Bayshore Boulevard	**2.7%**	**14.0%**	**2.7%**	**13.8%**
2	Between Sierra Point Parkway and I-380	**4.4%**	**14.2%**	**4.3%**	**13.8%**
U.S. 101 on-ramps:					
1	NB on-ramp from Bayshore Boulevard/Third Street	**16.6%**	**33.6%**	18.9%	45.0%
2	NB on-ramp from Harney Way or Geneva Avenue	0.0%	0.0%	**0.0%**	**0.0%**
3	SB on-ramp from Beatty Avenue/Alana Way or Geneva Avenue	**17.0%**	**19.5%**	**14.1%**	**15.8%**
Intersections:					
1	Bayshore Boulevard/Tunnel Avenue	**16.0%**	**27.7%**	19.8%	41.7%
2	Bayshore Boulevard/Blanken Avenue	**17.4%**	**25.2%**	33.0%	80.7%
3	Bayshore Boulevard/Arleta Avenue/San Bruno Avenue	**17.8%**	**27.5%**	34.4%	>100%
4	Bayshore Boulevard/Leland Avenue	**19.4%**	**27.9%**	**36.6%**	**87.0%**
5	Bayshore Boulevard/Visitacion Avenue	**18.7%**	**26.6%**	**35.6%**	**81.6%**
6	Bayshore Boulevard/ Sunnydale Avenue	**13.6%**	**18.9%**	**25.0%**	**52.3%**
7	Leland Avenue/Rutland Street	14.2%	27.8%	19.8%	62.2%
8	Tunnel Avenue/Blanken Avenue	**11.0%**	**14.5%**	**27.7%**	**70.8%**
9	Alana Way/Beatty Avenue	**7.2%**	**8.3%**	N/A	N/A
10	Alana Way/Harney Way/ Thomas Mellon Drive[c]	N/A	N/A	N/A	N/A
11	Thomas Mellon Dr/Harney Way[c]	0.1%	0.1%	**0.1%**	**0.1%**
12	Harney Way/Alana Way[c]	**1.7%**	**1.9%**	N/A	N/A

SOURCE: DMJM Harris/AECOM, 2007

Notes:
N/A indicates the intersection does not exist under the scenario.
Bold indicates location operates at unacceptable conditions.
For intersection #3 (Bayshore/Arleta/San Bruno), the Project contribution to cumulative growth with the regional transportation improvements would be greater than 100 percent since some background volumes would decrease due to the rerouting of traffic with the regional improvements.
[a] Project's percentage of total volume of vehicles in 2025.
[b] Project's percentage of increase in volume between 2007 and 2025.
[c] With the Executive Park project, the current intersection of Alana Way/Harney Way/Thomas Mellon Drive (intersection 10) would be split into two intersections: Alana Way/Harney Way (intersection 11) and Thomas Mellon Drive/Harney Way (intersection 12). This intersection reconfiguration is depicted in Figure 8.4.

Table 8.18
PROJECT'S CONTRIBUTION TO 2025 CUMULATIVE CONDITIONS--WEEKDAY PM PEAK HOUR

Location		Contribution to 2025 Cumulative Volumes[a]	Contribution to 2025 Cumulative Growth[b]	Contribution to 2025 Cumulative Volumes with Regional Improvements	Contribution to 2025 Cumulative Growth with Regional Improvements
U.S. 101 segments:					
1	Between I-280 and Third Street/Bayshore Boulevard	**2.6%**	**14.2%**	**2.6%**	**14.5%**
2	Between Sierra Point Parkway and I-380	**2.9%**	**9.1%**	**3.0%**	**10.8%**
U.S. 101 on-ramps:					
1	NB on-ramp from Bayshore Boulevard/Third Street	11.7%	30.7%	14.6%	62.8%
2	NB on-ramp from Harney Way or Geneva Avenue	**0.0%**	**0.0%**	**0.0%**	**0.0%**
3	SB on-ramp from Beatty Avenue/Alana Way or Geneva Avenue	**13.3%**	**14.9%**	**11.6%**	**12.7%**
Intersections:					
1	Bayshore Boulevard/Tunnel Avenue	16.3%	31.0%	19.7%	46.3%
2	Bayshore Boulevard/Blanken Avenue	**17.3%**	**26.7%**	29.6%	75.2%
3	Bayshore Boulevard/Arleta Avenue/San Bruno Avenue	**19.0%**	**29.8%**	**34.7%**	**>100%**
4	Bayshore Boulevard/Leland Avenue	**21.6%**	**32.8%**	**39.3%**	**>100%**
5	Bayshore Boulevard/Visitacion Avenue	**20.2%**	**30.2%**	35.9%	88.0%
6	Bayshore Boulevard/ Sunnydale Avenue	**15.5%**	**23.6%**	27.3%	70.4%
7	Leland Avenue/Rutland Street	15.5%	32.0%	19.9%	58.8%
8	Tunnel Avenue/Blanken Avenue	**12.5%**	**15.4%**	35.1%	74.3%
9	Alana Way/Beatty Avenue	**8.7%**	**9.6%**	N/A	N/A
10	Alana Way/Harney Way/ Thomas Mellon Drive[c]	N/A	N/A	N/A	N/A
11	Thomas Mellon Dr/Harney Way[c]	0.0%	0.0%	0.0%	0.0%
12	Harney Way/Alana Way[c]	**0.0%**	**0.0%**	N/A	N/A

SOURCE: DMJM Harris/AECOM, 2007
Notes:
N/A indicates the intersection does not exist under the scenario.
Bold indicates location operates at unacceptable conditions.
For intersections #3 and #4, the Project contribution to cumulative growth with the regional transportation improvements would be greater than 100 percent since some background volumes would decrease due to the rerouting of traffic with the regional improvements.
[a] Project's percentage of total volume of vehicles in 2025.
[b] Project's percentage of increase in volume between 2007 and 2025.
[c] With the Executive Park project, the current intersection of Alana Way/Harney Way/Thomas Mellon Drive (intersection 10) would be split into two intersections: Alana Way/Harney Way (intersection 11) and Thomas Mellon Drive/Harney Way (intersection 12). This intersection reconfiguration is depicted in Figure 8.4.

Impact 8-5 (continued):

anticipated Project contributions to projected cumulative freeway segment operational impacts would be considerable and would represent a ***significant impact*** (see criteria [a], [b], and [g] in subsection 8.3.1, "Significance Criteria," above).

Table 8.20 presents the results of the study freeway segment capacity analysis for 2025 Cumulative conditions during the weekday AM and PM peak hours (the corresponding LOS analysis calculation sheets are presented in the *Traffic Analysis Appendix*).

Mitigation 8-5: Implementation of *Mitigation 8-1C (Transportation Management Plan)* would help decrease the number of vehicle trips generated by the Project and reduce the magnitude of the Project's significant contribution at these freeway segment locations, but not to a less-than-significant level.

The projected poor 2025 cumulative conditions on these affected freeway segments could only be improved by creating additional mainline capacity, which would require substantial additional right-of-way acquisition, substantial freeway reconstruction, and associated substantial costs; and would require an associated interjurisdictional transportation improvement planning, prioritization and fair share funding formulation effort that exceeds the reasonable scope of the Project and reasonable control of the lead agency. Mitigation of this Project-related contribution to 2025 cumulative freeway congestion impacts to a less-than-significant level is therefore considered to be infeasible and is outside the jurisdiction of the Planning Department and Redevelopment Agency. Thus, the Project-related contribution to this cumulative freeway segment congestion represents a ***significant unavoidable impact***. If and when feasible mitigations and associated fair-share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, are formulated through interjurisdictional study and cooperation, such as the current interjurisdictional Bi-County Transportation Study effort, the Planning Department and Redevelopment Agency will require associated Project Area developer fair share contributions to these identified funding needs as a condition of development approval or as a condition of any Owner Participation Agreement.

Mitigation 8-7 (continued):

Implementation of *Mitigation 8-1C (Transportation Management Plan)* would decrease the number of vehicle trips generated by the Project and reduce the magnitude of the Project's significant contribution at these three locations, but the two significant unavoidable impacts described above would remain.

The results of the level of service analysis assuming *Mitigation 8-7* for the 2025 Cumulative conditions with improvements scenario are presented in Table 8.23. With implementation of these additional improvements, all the intersections with significant Project contributions would operate at acceptable conditions. However, for the reasons discussed in *Mitigation 8-7*, the 2025 cumulative intersection impacts at the Bayshore Boulevard/Leland Avenue and Bayshore Boulevard/Sunnydale Avenue intersections are considered significant and unavoidable.

Impact 8-8: 2025 Cumulative Impacts on Freeway Segment Operation with Planned Regional Roadway Improvements. Assuming implementation of the planned future regional roadway network changes, listed under Impact 8-7 above, the projected 2025 Cumulative impacts on study freeway segments identified under Impact 8-5 above would still occur. The Project would generate between approximately 14 percent of the projected cumulative growth in traffic on these freeway segments in the AM peak hour, and between 11 and 15 percent in the PM peak hour. These anticipated Project contributions would be considerable and would represent a ***significant impact*** (see criteria [a], [b], and [g] in subsection 8.3.1, "Significance Criteria," above).

Table 8.24 presents the results of the study freeway segment capacity analysis for the 2025 Cumulative scenario with planned regional roadway improvements (Figure 8.4) during the weekday AM and PM peak hours (the corresponding LOS analysis calculation sheets are presented in the *Transportation Analysis Appendix*). As shown in Table 8.24, all of the study freeway segments would continue to operate at unacceptable conditions (LOS F) in both directions during both the analysis periods. The degree and significance of the Project contribution to this cumulative impact are indicated in previous Tables 8.17 and 8.18.

Mitigation 8-8: Implementation of *Mitigation 8-1C (Transportation Management Plan)* would help decrease the number of vehicle trips generated by the Project and reduce the magnitude of the Project's significant contribution at these freeway segment locations, but not to a less-than-significant level.

The projected poor 2025 cumulative conditions on these affected freeway segments could only be improved by creating additional mainline capacity, which would require substantial additional right-of-way acquisition, substantial freeway reconstruction, and associated substantial costs; and would require an associated interjurisdictional transportation improvement planning, prioritization and fair share funding formulation effort that exceeds the reasonable scope of the Project and reasonable control of the lead agency. Mitigation of this Project-related contribution to 2025 cumulative freeway congestion impacts to a less-than-significant level is therefore considered to be infeasible and the Project-related contribution to this cumulative freeway segment congestion represents a ***significant unavoidable impact***. If and when feasible mitigations and associated fair-share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, are formulated through interjurisdictional study and cooperation, such as the current interjurisdictional Bi-County Transportation Study effort, associated Project Area developer fair share contributions to these identified funding needs will be required.

EPA has delegated authority to implement many of the federal programs to the states while retaining an oversight role to ensure that the programs continue to be implemented.

In California, the California Air Resources Board (CARB) is responsible for establishing and reviewing the state ambient air quality standards, developing and managing the California SIP, securing approval of the SIP from the U.S. EPA, and identifying toxic air contaminants (TACs). CARB also regulates mobile emission sources in California, such as construction equipment, trucks, and automobiles, and oversees the activities of air quality management districts, which are organized at the county or regional level.

An air quality management district is responsible for regulating stationary emission sources at facilities within its geographic areas and for preparing the air quality plan as required under the federal Clean Air Act and California Clean Air Act, and for enforcing CARB ambient air quality and mobile emission source standards. The Bay Area Air Quality Management District (BAAQMD) is the regional agency with regulatory authority over emission sources in the Bay Area, which includes all of San Francisco, San Mateo, Santa Clara, Alameda, Contra Costa, Marin, and Napa counties, and the southern portions of Sonoma and Solano counties.

9.1.4 Air Pollutants and Ambient Standards

Air pollutant levels are typically described in terms of "concentrations," which refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$). Standards were established by the federal Clean Air Act for six "criteria" pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates (PM_{10} and $PM_{2.5}$), and lead (Pb); the EPA refers to these pollutants as "criteria" pollutants because the agency has regulated them by developing public health- and welfare-based criteria as the basis for setting permissible concentrations.

Pollutants regulated under the California Clean Air Act are similar to those regulated under the federal Clean Air Act. The federal and California ambient air quality standards are summarized in Table 9.1. The California air quality standards are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, and vinyl chloride. Both the EPA and CARB review ambient air quality standards on a regular basis and make necessary adjustments in response to updated scientific information.

(a) Ozone (O_3). Ozone is the principal component of smog. Ozone is not directly emitted into the atmosphere, but instead forms through a photochemical reaction of reactive organic gases (ROG) and nitrogen oxides (NO_X), which are known as ozone precursors. Ozone levels are highest from late spring through autumn when precursor emissions are high and meteorological conditions are warm and stagnant. Motor vehicles create the majority of reactive organic gas and nitrogen oxide emissions in the Bay Area region.

Exposure to levels of ozone above current ambient air quality standards can lead to human health effects such as lung inflammation and tissue damage and impaired lung functioning. Ozone exposure is also associated with symptoms such as coughing, chest tightness, shortness of breath, and the worsening of asthma symptoms. The greatest risk for harmful health effects belongs to outdoor workers, athletes, children, and others who spend greater amounts of time outdoors during smoggy periods. Elevated ozone levels can reduce crop and timber yields, as well as damage native plants. Ozone can also damage materials such as rubber, fabrics, and plastics.

Extensive research reviewed by CARB indicates that exposure to outdoor PM_{10} and $PM_{2.5}$ levels is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. PM exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, and aquatic and other ecosystems.

(f) Lead (Pb). Leaded gasoline (phased out of U.S. since 1996), paint (houses, cars), smelters (metal refineries), and manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has a range of adverse neurotoxic health effects; children are at special risk. Some lead-containing chemicals cause cancer in animals.

(g) Toxic Air Contaminants (TAC). TACs are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer or serious illness) and include, but are not limited to, the criteria air pollutants listed above. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level. The identification, regulation, and monitoring of TACs is relatively new compared to that for criteria air pollutants that have established ambient air quality standards. TACs are regulated or evaluated on the basis of risk to human health rather than comparison to an ambient air quality standard or emission-based threshold.

(h) Asbestos. Asbestos is a fibrous mineral, which is both naturally occurring in ultramafic rock (a rock type commonly found in California), and used as a processed component of building materials. Because asbestos has been proven to cause serious adverse health effects, such as asbestosis and lung cancer, it is strictly regulated either based on its natural widespread occurrence or in its use as a building material. The BAAQMD regulates the demolition of buildings and structures that may contain asbestos. The provisions that cover these operations are found in BAAQMD Regulation 11, Rule 2: *Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing* (also see chapter 11, Hazards and Hazardous Materials, of this EIR).

State of California regulations require an asbestos airborne toxic control measures (ATCM) determination for construction and grading activities in areas known to have naturally occurring asbestos (NOA) (California Code of Regulations § 93015). In 2002, the Bay Area Air District subsequently issued regulations for the control of airborne asbestos for areas where NOA is found or is likely to be found. Information on the regulation is available at the URL: http://www.baaqmd.gov/enf/compliance_assistance/asbestos_atcm/index.htm. Under the air districts regulations, all construction projects that disturb less than one acre must comply with specified control actions, including application of water to areas being excavated or grading, wetting or covering soil storage piles, limiting vehicle speeds, and controlling dispersion by vehicles offsite. Projects that disturb greater than one acre must gain approval from the district on a more comprehensive written plan to minimize emissions and control sources.

(i) Diesel Exhaust. Diesel exhaust is the predominant TAC in urban air, with the potential to cause cancer. It is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to CARB, diesel exhaust is a complex mixture of gases,

vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by CARB, and are listed as carcinogens either under the state's Proposition 65 or under the federal Hazardous Air Pollutants programs. California has adopted a comprehensive diesel risk reduction program. The EPA and CARB have adopted low sulfur diesel fuel standards that will reduce diesel particulate matter substantially. These standards went into effect in June 2006.

(j) Greenhouse Gases and Global Climate Change. 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. Climate change is

- *Reduce mobile sources of air pollution through implementation of the Transportation Element of the General Plan.* (Objective 2)

- *Decrease the air quality impacts of development by coordination of land use and transportation decisions.* (Objective 3)

- *Take advantage of the high-density development in San Francisco to improve the transit infrastructure and also encourage high-density and compact development where an extensive transportation infrastructure exists.* (Policy 3.1)

- *Encourage mixed land use development near transit lines and provide retail and other types of service-oriented uses within walking distance to minimize automobile dependent development.* (Policy 3.2)

- *Continue existing City policies that require housing development in conjunction with office development, and expand this requirement to other types of commercial developments.* (Policy 3.3)

- *Continue past efforts and existing policies to promote new residential development in and close to the downtown area and other centers of employment, to reduce the number of auto commute trips to the city and to improve the housing/job balance within the city.* (Policy 3.4)

- *Continue existing growth management policies in the city and give consideration to the overall air quality impacts of new development, including its impact on the local and regional transportation system, in the permit review process. Ensure that growth will not outpace improvements to transit or the circulation system.* (Policy 3.5)

- *Link land use decision-making policies to the availability of transit, and consider the impacts of these policies on the local and regional transportation system.* (Policy 3.6)

- *Exercise air quality modeling in building design for sensitive land uses such as residential development that are located near the sources of pollution such as freeways and industries.* (Policy 3.7)

- *Encourage and require planting of trees in conjunction with new development to enhance the pedestrian environment, and select species of trees that optimize achievement of air quality goals.* (Policy 3.9)

- *Minimize exposure of San Francisco's population, especially children and the elderly, to air pollutants.* (Policy 4.3)

- *Minimize particulate matter emissions from road and construction sites.* (Objective 5)

- *Encourage the use of building and other construction materials and methods which generate minimum amounts of particulate matter during construction as well as demolition.* (Policy 5.2)

- *Encourage emission reduction through energy conservation to improve air quality.* (Policy 6.1)

- *Encourage energy conservation through retrofitting of existing facilities.* (Policy 6.3)

(b) General Plan Environmental Protection Element. The adopted San Francisco General Plan *Environmental Protection Element* (Air Quality Section) contains the following objective and policies relevant to air quality in the Project Area:

Mitigation 9-1A. For all discretionary ***demolition*** activity in the Project Area, require implementation of the following dust control measures by demolition contractors, where applicable:

- Water active demolition areas to control dust generation during demolition of structures and break-up of pavement.
- Cover all trucks hauling demolition debris from the site.
- Use dust-proof chutes to load debris into trucks whenever feasible.
- Apply (non-toxic) soil stabilizers to demolition areas after completion of demolition activities.

The above measures may be revised or supplemented over time by new BAAQMD regulations. Implementation of these measures would reduce the demolition-related air quality impacts of the redevelopment program to a ***less-than-significant level.*** [Additional, mandatory procedures for soil excavation and handling during remediation are described in EIR chapter 11, Hazards and Hazardous Materials.]

Mitigation 9-1B. For all discretionary ***remediation, grading, or construction*** activity in the Project Area, require implementation of the following dust control measures by construction (also remediation) contractors, where applicable:

- Water all active remediation and construction areas at least twice daily, or as needed to prevent visible dust plumes from blowing off-site.
- Cover all trucks hauling soil, sand, and other loose materials.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.
- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- Limit the area subject to excavation, grading, and other construction activity at any one time.

(continued)

renovation, or removal of asbestos-containing building materials is subject to the limitations of BAAQMD Regulation 11, Rule 2. The rule requires special handling of asbestos containing materials (e.g., by keeping materials continuously wetted). The Rule prohibits any visible emissions of asbestos-containing materials to outside air. Project applicants would be required to consult with the BAAQMD's Enforcement Division prior to commencing demolition of a building containing asbestos materials. If a project adheres to this requirement, asbestos-related impacts would be considered ***less-than-significant***.

9.3.3 Long-Term Local Air Quality Effects

Changes in Local Carbon Monoxide Levels. Development activity resulting from the redevelopment program would generate new vehicle trips and change traffic patterns. Concentrations ("hot spots") of carbon monoxide are greatest near intersections and roadways with congested traffic. Such carbon monoxide emissions can be a problem in wintertime when stagnant meteorological conditions occur (i.e., very little vertical or horizontal mixing of air in the lower atmosphere).

To evaluate "hot spot" potential, a microscale impact analysis was conducted adjacent to five signalized intersections most impacted by Project traffic (see Table 9.3). The intersections chosen were based on their level of service (LOS) and percentage contribution of Project-generated traffic. For this analysis, local carbon monoxide concentrations were estimated by applying the BAAQMD's methodology for manual calculation of concentrations along roadways and intersections to the results of the traffic study prepared for this EIR (see chapter 8, Transportation and Circulation). BAAQMD's methodology included an assumed wind direction parallel to the primary roadway, a wind speed of less than one meter per second, extreme atmospheric stability, and a receptor at the edge of the roadway--all of which are conservative assumptions consistent with CEQA.

As shown in Table 9.3, the analysis demonstrated that no exceedances would occur in the vicinity of the analyzed intersections under any of the Project or cumulative scenarios. Therefore, the effect of the Project on local carbon monoxide levels would be ***less-than-significant*** (see criterion 6 in subsection 9.3.1, "Significance Criteria," above). Carbon monoxide concentrations are projected to progressively lower compared to existing conditions due to improvements in the automobile fleet, increasing use of hybrid vehicles, attrition of older, high-polluting vehicles, and improved fuel mixtures. Such reductions would offset effects of increased traffic due to cumulative development. Thus, Project-related and cumulative traffic would have a ***less-than-significant*** impact on local carbon monoxide concentrations.

Mitigation. No significant local carbon monoxide impact has been identified; no mitigation is required.

9.3.4 Long-Term Regional Air Quality Effects

Compared to land use policy under the current San Francisco General Plan, growth facilitated by the redevelopment program would allow *more intensive* residential development in the Project Area. The Project would both provide for an increase in the number of residential units and in the amount of retail uses over existing conditions (see Table 3.1 in EIR chapter 3, Project Description). Project implementation would therefore result in an increase in *predicted* (i.e., based on current General Plan vs. proposed redevelopment program) vehicle miles traveled, which the BAAQMD CEQA Guidelines suggest as a measure of significance for plans and programs. However, the proposed redevelopment program also includes many features that

Mitigation 10-2 (continued):

significant archaeological resource as defined in CEQA Guidelines section 15064.5(a)(c).

Archaeological Testing Program. The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). An archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes a historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include notification of designated members of the community as appropriate, additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsor either:

A) The project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or

B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archaeological Monitoring Program (AMP). If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented, the AMP shall minimally include the following provisions:

- The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be

(continued)

Mitigation 10-3 (continued):

ERO has, in consultation with the archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits.

- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis.
- If an intact archaeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/ construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. Notification shall also include designated members of the community as appropriate. The archaeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archaeological consultant determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsor either:

A) The project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or

B) An archaeological data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archaeological Data Recovery Program (ADRP). If an archaeological data recovery program is required by the ERO, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The project archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archaeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are

(continued)

Mitigation 10-4. For individual development projects in Redevelopment Zone 2, the project applicant shall consult with the Major Environmental Analysis archaeologist at the San Francisco Planning Department prior to any development activity and, at the direction of the Planning Department, shall undertake the following measures to avoid any potentially significant adverse impact on possible buried or submerged cultural resources.

The project sponsor shall distribute the San Francisco Planning Department archaeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc., firms); and utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the City's Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractors, and utilities firm) to the ERO confirming that all field personnel have received copies of the "ALERT" Sheet.

Should any indication of an archaeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken. Notification shall also include designated members of the community as appropriate.

If the ERO determines that an archaeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archaeological consultant. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the archaeological resource. The archaeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ (in place) of the archaeological resource; an archaeological monitoring program; or an archaeological testing program. If an archaeological monitoring program or archaeological testing program is required, it shall be consistent with the City's Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archaeological resource is at risk from vandalism, looting, or other damaging actions.

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Soil vapor extraction (SVE) reports on the status of the soil remediation process for the Ingersoll-Rand property have been presented semiannually to DTSC since the extraction system began operating in 1999. The most recent report approved and released by DTSC is dated November 2, 2006.[1] During the six-month period covered by the report (January through June 2006), approximately 12 pounds of VOCs, primarily tetrachloroethene (PCE) and trichloroethene (TCE), were estimated to have been removed from soil on the Ingersoll-Rand property. Since the SVE system began on-site operation in 1999, about 3,704 pounds of VOCs have been removed.

Ingersoll-Rand most recently submitted a Draft Soil Remedial Action Plan (Draft RAP) for their property to DTSC in April 2003. DTSC issued comments on this Draft RAP in August 2003, but has not yet received a revised RAP.[2] A pilot study for the groundwater in the DTSC project area is underway and that the Draft RAP can not be finalized until those results are available.

Groundwater Investigation and Remediation Status--Ingersoll-Rand and UPC Properties. Several actions have also been taken to address identified and continuing groundwater contamination beneath both the Ingersoll-Rand and UPC properties. In 1985, DTSC listed the Bayshore Railyard property (including both the UPC and Brisbane areas) on its State Priority Ranking list. In 1988, DTSC issued a Remedial Action Order (RAO) to SPTC, requiring investigation and a Remedial Action Workplan (RAP) for the Bayshore Railyard property. In 1993, DTSC divided the Railyard property into Operable Unit 1 (OU-1, which includes the UPC property) and OU-2, and approved a final RAP for OU-1. DTSC continues to be the regulatory agency for OU-1. The San Francisco Regional Water Quality Control Board (RWQCB) is the regulatory agency for OU-2.[3]

Because there is a commingling of groundwater between the Ingersoll-Rand property and the UPC property, the two owners have agreed to address groundwater contamination jointly. Joint investigation and remedial action activities have been underway to define the nature and extent of, and to remediate, contamination. A groundwater remediation (treatment) system to address VOC contamination on the Ingersoll-Rand and UPC properties began operation in October 1994 and became fully operational in 1995. Across both properties, groundwater monitoring wells have been installed, and groundwater samples have been collected and analyzed regularly. Sampling results show that the highest groundwater VOC concentration is located south of Visitacion Avenue.

In 1994, UPC installed and began operating a groundwater pump and treatment system to address VOC-impacted groundwater under both the Ingersoll-Rand and UPC properties.[4]

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[1]Treadwell & Rollo, Inc., Environmental & Geotechnical Consultants; *Revised Soil Vapor Extraction (SVE) System Semiannual Operation Report* (January through June 2006); November 2, 2006.

[2]State of California, California Environmental Protection Agency, Department of Toxic Substances Control; *Imminent and Substantial Endangerment and Determination Order and Remedial Action Order, Health and Safety Code Sections 25355.5(a)(1)(B), 25358.3(a), 58009, and 58010, Docket No. IS&E 06/07-002*; July 18, 2006.

[3]Universal Paragon Corporation, "Factual Background," May 4, 2007.

[4]DTSC; *Schlage Lock Site: Fact Sheet.*

Ongoing quarterly reports have been submitted by UPC to the DTSC, the RWQCB, and the City of San Francisco Bureau of Environmental Regulation and Management (BERM), documenting

for UPC to acquire the Ingersoll-Rand property (see [e] below); and (2) if so, proceed with remediation of the site under DTSC oversight until DTSC issues a "No Further Action" letter confirming completion of remediation work. This exploratory process does not commit UPC to either acquiring or remediating the Ingersoll-Rand property. If at any point the above exploratory process is terminated, then DTSC would cease suspension of the Order, and the Order would go back into effect.

(e) Anticipated Future Soil and Groundwater Remediation Activities. UPC received proposals from several environmental remediation contractors for remediation of the Ingersoll-Rand property, and has selected a remediation contractor that it anticipates it would work with in the event that UPC acquires the Ingersoll-Rand property. Before remediation activities on the property will be permitted to begin, a Remedial Action Plan (RAP) describing the proposed remedial strategy for the property must be submitted to and approved by DTSC, which will continue to serve as the lead environmental oversight agency for the property. Components proposed for the RAP include:

- Soil excavation and off-site disposal;
- Soil excavation and on-site re-use (any re-use of soils must first be approved by DTSC);
- In Situ (in place) Chemical Oxidation (ISCO). Oxidation chemically converts hazardous contaminants to non-hazardous or less toxic compounds that are more stable, less mobile, and/or inert. The oxidizing agents most commonly used are ozone, hydrogen peroxide, hypochlorites, chlorine, and chlorine dioxide. Hydrogent peroxide will be used in this process along with Fenton's Reagent as the catalyst. A catalyst is a chemical that increases the strength or speed of a process.
- Enhanced Reductive Dechlorination (ERD). Reductive Dechlorination is a biological process that involves the breakdown of VOCs in groundwater by naturally occurring bacteria. The breakdown of VOCs is enhanced by injecting sodium lactate into the groundwater. The bacteria consume sodium lactate and in the process breakdown the VOCs in the groundwater into less toxic substances.

Remediation planning will include the following plans and measures: utility clearance, security measures, waste management, a Health and Safety Plan, a Soil Sampling Plan, treatment and excavation plans, a dust control plan, an air monitoring plan and a Transportation Plan. These plans and measures would be in-place and undertaken to prevent the creation of significant hazards to the public and the environment. The Health and Safety Plan and Transportation Plan will include contingency/emergency information, in case of a foreseeable upset and accident. Preparation of the Health and Safety Plan component will serve to protect the workers during all remediation and construction activities. Following DTSC approval of the RAP, remediation and removal work would be conducted in accordance with applicable OSHA worker safety regulations. The handling, transport, and storage of any hazardous waste or potentially hazardous waste would be conducted in accordance with applicable laws and regulations.

(f) Anticipated Building Demolition Procedures. Most of the buildings on the Ingersoll-Rand property are proposed for demolition as part of the Project. Both DTSC and the company conducting the clean-up of the site believe there is source material under the building slabs that may be serving as a continuing source of contamination to groundwater. Previous soil removal activities have been limited by the presence of buildings, where further excavation would have

compromised the building foundations. Therefore, the buildings where historical operations took place must be removed in order to complete the clean-up of soil at the property.

The debris generated from demolition activities would be crushed into base-rock and stockpiled on-site to be used for site backfill and development. It is estimated that approximately 55,000 tons of recycled concrete would be left on-site or recycled as construction material.

DTSC-approved SMP that will be a part of the RAP. Of the 46,000 cyds of soil, it is estimated that 6,000 cyds will be excavated from known and suspected source areas ("hot spots") where the concentration of contaminants is likely to be high, such as in areas of previous remedial activities and under building foundations. Soil from hot spots will be removed and transported off-site for disposal at an approved waste facility. Of the remaining 40,000 cyds, it is expected that approximately 17,000 cyds will have a modest amount of contamination and will require on-site treatment before being allowed to be re-used on-site. Treatment methodology is expected to be on-site aeration, conducted in a manner as allowed and approved by DTSC and the BAAQMD, with all appropriate air monitoring and controls. It is expected that the remaining 23,000 cyds of soil will be within residential clean-up standards or acceptable for use in open space and recreational areas without treatment. This soil will be handled in a manner typical for grading and construction projects and in compliance with the SMP.

(h) Sensitive Nearby Land Uses. Numerous preschools, elementary and middle schools, childcare centers, and senior centers are located within one mile of Redevelopment Zone 1. If hazardous materials/waste would be handled within a quarter mile of any existing or proposed school, notification to the schools would be requried to occur in accordance with Title 14, California Code of Regulations, Section 15168.

11.1.3 Hazards and Hazardous Materials Conditions Database for Project Area and Surrounding Vicinity

The term "Project Area" as used in this chapter and throughout this EIR is defined to mean both the approximately 46-acre area within which the overall "Project" under CEQA would occur, and the associated redevelopment project area to be established within the same boundary through Redevelopment Agency and Board of Supervisors adoption of the Redevelopment Plan. The Project Area boundary is delineated on upcoming Figure 11.1 in this chapter.

(a) Records Search. A summary listing of known recorded sites (i.e., listed in publicly available records) in the Project vicinity (i.e., in the Project Area or within an approximate 500-foot radius ["buffer zone"] of the Project Area) that are or have been contaminated with and/or generators of hazardous materials is provided in Table 11.1. Table 11.1 was developed from a search of jurisdictional agency database sources conducted for the EIR authors by Environmental Data Resources, Inc. (EDR), in order to provide a general indication of possible hazardous material sites and their remediation status on or near the proposed Project Area.[1] As indicated in Table 11.1 and described below, a number of sites in the Project Area and vicinity may contain hazardous materials and have the potential for related public health hazards, including possible soil or groundwater contamination, and hazards associated with other potentially toxic sources. The vast majority of recorded sites in the Project Area are on the Ingersoll-Rand property (in Redevelopment Zone 1); all recorded sites in the 500-foot buffer zone around the Project Area, except one, are on Tunnel Avenue across from the Project Area's eastern boundary.

[1]The sites listed in Table 11.1 have also been mapped for use by City staff and the EIR authors in evaluating potential Project impacts. A copy of the complete EDR records search report, including the data map (Environmental Data Resources, Inc., EDR Data Map Area Study, Visitacion Valley Redevelopment Program, June 9, 2006), is available for public review at the offices of the San Francisco Redevelopment Agency, 1 South Van Ness Avenue, Fifth Floor, San Francisco; telephone: 415-749-2400.

The database summarized in Table 11.1 represents a broad listing of sites with varying potential for risk from the possible existence of hazardous materials. There are extensive overlaps (redundancies) among these various database listings. Each database listed in Table 11.1 is

Lighting tubes typically contain concentrations of mercury that may exceed regulatory thresholds for hazardous waste and, as such, must be managed in accordance with hazardous waste regulations. Elemental mercury waste is considered hazardous. Mercury can also be present in traps in the plumbing of older buildings in which mercury-containing equipment has been used.

11.2.6 Other Regulatory Agencies

The following federal and state agencies have regulatory authority for the handling and management of hazardous materials and wastes, and general public health and safety in San Francisco:

(a) U.S. Environmental Protection Agency. The U.S. Environmental Protection Agency (EPA), Region IX, regulates chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices; protects workers and the community (along with CalOSHA--see below); and integrates the federal Clean Water Act and Clean Air Act into California legislation. The EPA (or one of its divisions, such as DTSC) maintains many of the database sources listed in Table 11.1 of this chapter.

(b) Federal Occupational Safety and Health Administration. The federal Occupational Health and Safety Administration (OSHA) establishes and enforces federal regulations related to health and safety of workers exposed to toxic and hazardous materials. In addition, OSHA sets health and safety guidelines for construction activities and manufacturing facility operations.

(c) California Occupational Safety and Health Administration. The California Occupational Safety and Health Administration (CalOSHA) is responsible for promulgating and enforcing state health and safety standards and implementing federal OSHA laws.

(d) State of California Regional Water Quality Control Board. As part of a statewide system, the Regional Water Quality Control Board (RWQCB), San Francisco Region, protects surface and groundwater quality from pollutants discharged or threatened to be discharged to the waters of the state. The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits and associated Storm Water Pollution Prevent Plan (SWPPP) requirements and regulates leaking underground storage tanks and other sources of groundwater contamination.

(e) California Department of Toxic Substances Control. The California EPA, Department of Toxic Substances Control (DTSC), regulates hazardous substances and wastes, oversees remedial investigations, protects drinking water from toxic contamination, and warns public exposed to listed carcinogens. DTSC is the regulatory agency with oversight of the Ingersoll-Rand and UPC property remediation in the Project Area, as described in subsection 11.1.2 of this chapter.

(f) California Highway Patrol/Caltrans. The California Highway Patrol (CHP) and Caltrans have primary regulatory responsibility for the transportation of hazardous wastes and materials.

(g) Bay Area Air Quality Management District. The Bay Area Air Quality Management District (BAAQMD) is responsible for the permitting of industrial air emissions, and sets and enforces regional air quality standards. For example, the BAAQMD may impose specific requirements to protect air quality from dust, lead, hydrocarbon vapors, or other airborne contaminants during hazardous materials remediation.

- Notify the Department of Building Inspection (DBI) prior to starting work, describing the nature, location, and schedule of the work;

- Post a sign at all work locations where containment is required, stating that lead abatement is in progress and public access is prohibited;

- Notify the tenant(s) when the lead abatement work will be performed on a residential property occupied by one or more tenants; and

- The contractor shall notify the property owner when work on a residential project will disturb lead-based paint.

Section 3407 requires lead-based paint containment barriers as effective at protecting human health and the environment as the performance standards in the most recent *Guidelines for Evaluation and Control of Lead-Based Paint Hazards* (U.S. Department of Housing and Urban Development). Accordingly, HEPA vacuums may be required for abrasive blasting, water blasting, scraping, or sanding; and burning, torching, and similar activities are prohibited. Following completion of lead-based paint abatement, all visible lead-based paint particles must be removed from the site.

The DBI may inspect lead-based paint abatement activities at any time during construction to confirm that work is being conducted in accordance with Section 3407. The DBI is also responsible for addressing citizen complaints related to lead-based paint abatement activities and may issue a Notice of Violation, a Stop Work order, or a fine for work in violation of Section 3407.

Implementation of the regulations outlined above would result in a ***less-than-significant impact*** associated with lead-based paint exposure.

Mitigation. No significant adverse impact related to potential lead-based paint exposure has been identified; no mitigation is required.

Potential Impacts Due to Accidental Release of Hazardous Materials or Wastes During Normal Transport Operations--Entire Project Area. The proposed Project could result in the use and disposal of hazardous materials in the Project Area, which in turn could increase the potential for transportation-related accidents along the routes where these hazardous materials are transported. Transport routes would include internal new roads in Zone 1, Bayshore Boulevard, and U.S. 101 via the Bayshore Boulevard, Harney Avenue and Beatty Avenue/Alana Way interchanges. Transporters of hazardous materials and wastes are subject to local, state, and federal regulations, which would minimize the risk; however, the potential would always remain for an accidental release of hazardous materials or wastes, which could then result in a potential impact on public health or the environment.

In Redevelopment Zone 1, the proposed remediation design plan would include a Transportation Plan that would address accidental release of contaminated soil. Soils disturbed during demolition would be handled in accordance with a Soil Management Plan (SMP). The SMP would include procedures for excavation management, profiling for stockpiles, and procedures to identify soil for re-use or off-site disposal, as appropriate. The SMP would be updated as remediation progresses in accordance with the final RAP (see 11.1.2[e] above).

Impact 13-2: Project-Facilitated Groundborne Vibration Impacts. The Project (redevelopment program) would not introduce any sources of groundborne vibration. However, the Project would introduce new development along the Caltrain rail line and along the Muni light rail line. Railroad operations would introduce potential groundborne vibration issues if vibration-sensitive development, such as residences, were proposed close to these operations. Both local and through trains were observed to travel relatively slowly along the segment of the Caltrain/UPRR tracks in the Project Area (through trains were estimated at less than 20 mph). Based on vibration levels measured as a part of the EIR noise analysis, groundborne vibration levels are typically less than the FTA criteria for frequent events (72 VdB) at a distance of approximately 110 feet from the centerline of the nearest railroad tracks. With respect to light rail operations of the Muni T line, which incorporates features such as modified suspensions on the trains and vibration-control track systems, the impact threshold distance for the FTA criteria for frequent events would be 55 feet from the light rail tracks.[1] Therefore, where residential buildings are proposed *within* 110 feet or less of the railroad tracks, or *within* 55 feet or less of the light rail tracks, a ***potentially significant intermittent vibration impact*** could occur (see criterion 2 in subsection 13.3.1, "Significance Criteria," above).

Mitigation 13-2. Prior to the development of habitable buildings within 110 feet of the centerline of the nearest railroad tracks, or within 55 feet of the light rail tracks, a site-specific vibration study shall be required demonstrating that groundborne vibrations associated with rail operations either (1) would not exceed the applicable FTA groundborne vibration impact assessment criteria (see Table 13.5 of this EIR), or (2) can be reduced to below the applicable FTA criteria thresholds through building design and construction measures (e.g., stiffened floors). Implementation of this measure would reduce this potential intermittent vibration impact to a ***less-than-significant level.***

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[1] Third Street Light Rail Project Final EIS/EIR, Section 5.13.3.

Mitigation 13-3. Site-specific noise studies consistent with the requirements of the State Building Code (SBC) shall be conducted for all new Project-facilitated residential uses within 75 feet of the Caltrain line and along the Bayshore Boulevard frontage to identify appropriate noise reduction measures to be included in project final design. Each noise study must be submitted to and approved by the San Francisco Planning Department and/or the San Francisco Redevelopment Agency prior to City issuance of a residential building permit. Identified noise reduction measures may include:

- Site planning techniques to minimize noise in shared residential outdoor activity areas by locating such noise-sensitive areas behind buildings or in courtyards, or by orienting residential terraces to alleyways rather than streets, whenever possible;

- Incorporation of an air circulation system in all affected units, which is satisfactory to the San Francisco local building official, so that windows can remain closed to maintain interior noise levels below 45 dBA L_{dn} (use of "Z" ducts is discouraged);

- Incorporation of sound-rated windows and construction methods in residential units proposed along streets or the Caltrain line where noise levels would exceed 70 dB L_{dn}; and

- Pre-occupancy noise testing following a methodology satisfactory to the San Francisco Department of Health shall be completed prior to occupancy to demonstrate compliance with noise mitigation objectives.

Noise levels at multi-family residential property lines around Project-facilitated development should be maintained at an L_{eq} not in excess of 60 dBA during the daytime hours and 50 dBA during nighttime hours (10:00 PM to 7:00 AM), unless ambient noise levels are higher. In those cases, the existing ambient noise level would be the noise level standard.

Implementation of these measures to the satisfaction of the San Francisco Planning Department and/or the San Francisco Redevelopment Agency would reduce potential Project-related noise impacts on new residential uses to a ***less-than-significant level***.

Project-Facilitated Noise Level Increases. The proposed Visitacion Valley redevelopment program would change noise levels by facilitating new development in the Project Area and changing traffic patterns. The proposed Project is expected to introduce commercial uses adjacent to existing or proposed residential land uses. Redevelopment Zone 1 would be developed with retail, restaurant, and grocery uses in close proximity to residences, sometimes in the same building. Existing vacant lots and underutilized properties in Redevelopment Zone 2 along Bayshore Boulevard and Leland Avenue could be developed with new mixed uses, including residential, retail, and restaurants. New commercial development proposed along with, or next to, new residential development could generate noise from mechanical equipment,

truck deliveries, outdoor conversations from restaurant customers, and other potential activities that could result in adverse changes to the noise environment. In addition, Project-facilitated new residential and mixed use development could generate noise that may adversely affect existing or proposed noise-sensitive (e.g., residential) uses; an example of related noise sources would be mechanical equipment associated with new multi-family residential structures.

Based on the general assumptions described in subsections 3.11 (Project-Facilitated Growth Assumptions) in chapter 3 (Project Description), and consideration of existing land use characteristics and potential, the projections of Project-facilitated growth in the Project Area in Table 16.1 have been developed by Redevelopment Agency and Planning Department staff. The projections are intended to reflect the assumption that the redevelopment program will be highly successful in stimulating, directly and indirectly, the development of a substantially greater amount of additional residential, neighborhood-serving retail, and cultural/institutional/educational development than a future without-project scenario.

As shown in Table 16.1, it is estimated that the proposed combination of Redevelopment Plan activities, Design for Development provisions, and General Plan amendment/Planning Code changes in the Project Area would facilitate a net housing increase of up to approximately 1,600 new units, a net retail commercial increase of up to approximately 132,000 square feet, a net decrease in office and production/distribution/repair uses of up to approximately 39,000 square feet, and a net increase in cultural/institutional/educational uses (community centers and library) of up to approximately 25,000 square feet.

16.1.2 External Growth-Inducement

The primary growth-inducing impacts of the Project would be confined within the boundaries of the Project Area. To a lesser degree, secondary growth-inducing impacts (the "multiplier" effect) could also be expected in portions of the City and immediate area outside the Project Area boundary. In particular, Project-induced increases in the local residential population could be expected to have a "multiplier" effect, increasing community-supporting commercial and other activities in the surrounding area. In addition, Project-facilitated infrastructure improvements, including the transportation system impact mitigation measures identified in chapter 8 (Transportation and Circulation) herein, as well as the land use intensification that would be facilitated within the Project Area, might induce additional pressure to intensify use of adjacent underused lands in the City of Brisbane's Baylands area.

Such secondary growth-inducing land use impacts outside the Project Area would occur primarily in the form of future individual development and business activity proposals and associated applications. Most of this primary and secondary growth inducement would be expected to occur in a manner consistent with existing General Plan and zoning controls and, where applicable, would also be subject to project-specific environmental impact documentation and public review under CEQA to ensure that any associated significant adverse environmental impacts are adequately addressed. These standard procedures and requirements would be expected to reduce such secondary growth-inducement impacts of the Project to less-than-significant levels, unless specific statements of overriding consideration were adopted consistent with CEQA.

16.2 UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

CEQA Guidelines section 15126.2(b) requires that the EIR discuss "significant environmental effects which cannot be avoided if the proposed project is implemented." Significant unavoidable impacts are those that would not be reduced to less-than-significant levels by the mitigation measures recommended in the EIR.

this alternative, more recreational benefits (an expanded community center) would be conveniently available to the surrounding area.

(c) Population and Housing. In comparison to the proposed Project, the reduced residential total under this alternative would have a reduced *beneficial effect* in assisting San Francisco in achieving increased housing opportunity in the Visitacion Valley neighborhood, a better citywide balance between employed residents and jobs, more housing concentration near commercial uses, transit, and other services, and associated decreases in the current in-commuting trend.

(d) Visual Factors. As indicated in Table 17.2, this increased building preservation alternative could result in beneficial aesthetic effects in comparison to the proposed Project. Nevertheless, new development elsewhere in Zones 1 and 2 at densities and heights greater than currently existing in the Project Area would result in potentially significant, aesthetic and visual resource impacts similar to the proposed Project, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 7 of this EIR.

(e) Transportation and Circulation. The comparative trip generation characteristics of each alternative are identified in Table 17.3. Compared to the proposed Project, the Preservation and Re-use alternative, with the added approximately 190,000 square-foot recreation center, would result in a greater net traffic increase (about 24 percent more daily trips) than the Proposed Project, and similar significant unavoidable transportation and circulation impacts. However, the proposed Project includes a more balanced mix of high-density, mixed land uses that would more effectively promote transit use and shorter commutes. It should be noted that, with no proposed detailed mix of recreational uses or interior building designs to accommodate such uses available at this highly preliminary stage, the estimated recreational traffic generation for this alternative has been based on a conservative factor (57.0 daily trips per 1,000 gross square feet), consistent with the conservative analyses required by CEQA; the actual recreational traffic generation for this alternative might be considerably lower.

(f) Air Quality. Compared to the proposed Project, this alternative would result in similar potentially significant, air quality impacts related to construction-period emissions and increased significant unavoidable impacts related to long-term regional emissions. Similar to the Project, the long-term emissions impacts would remain significant and unavoidable even with implementation of EIR-identified mitigation, primarily due to the net increase of daily vehicular trips.

(g) Cultural and Historical Resources. Compared to the proposed Project and other alternatives, the Preservation and Re-use alternative would result in fewer potentially significant impacts on cultural and historic resources because the alternative would rehabilitate and adaptively re-use Schlage Lock Plant 1 Buildings B and C (a total of approximately 190,000 square feet), both of which are considered "contributing" to a potential Schlage Lock Factory Historic Site (see details in EIR chapter 10). The buildings would be re-used as additional community space adjacent to the proposed Old Office Building community center.

(h) Hazards and Hazardous Materials. Similar to the proposed Project and other alternatives, the current ongoing remediation program would continue under this alternative and no potentially significant hazards or hazardous materials impacts would result. However, according

to DTSC,[1] this alternative could impede hazardous materials remediation because the Schlage Lock Plant 1 buildings, which would be preserved under the alternative, could have

[1]Barbara J. Cook, P.E., Chief, Northern California Coastal Cleanup Operations Branch, State Department of Toxic Substances Control (DTSC); written communication, April 11, 2008.

19. ORGANIZATIONS AND PERSONS CONTACTED, VISITACION VALLEY CITIZENS ADVISORY COMMITTEE, AND EIR TEAM

19.1 ORGANIZATIONS AND PERSONS CONTACTED

SAN FRANCISCO REDEVELOPMENT AGENCY STAFF

Alicia Bert, Assistant Development Specialist
Tom Evans, Lead Planner
Christina Ferracane, former Planner
Lila Hussain, Associate Planner
James Morales, General Counsel
Stanley Muraoka, Environmental Review Officer
Penny Nakatsu, Deputy General Counsel
Lisa Zayas-Chien, Project Manager

SAN FRANCISCO PLANNING DEPARTMENT STAFF

Moses Carrette, Historic Resources Survey Coordinator
Joy L. Navarrete, Senior Environmental Planner
Sarah Dennis Phillips, Citywide Policy
Jessica Range
Kenneth J. Rich, Associate Planner
Steven Shotland, Planner
Adam Varat, Planner

OTHER CITY AND COUNTY OF SAN FRANCISCO STAFF

Greg Asay, former Legislative Assistant, Supervisor Sophie Maxwell
Randall Dean, Archeologist
Moses Carrette, Historic Resources Survey Coordinator
Rich Chien, Residential Green Building Coordinator, SF Environment
Lewis Douglas, Public Works Department
Dawn Kamalanathan, Planning Director, Recreation and Park Department
Ellen Levin, Director of Water Resources, SFPUC
Sarah Minick, Stormwater Management and Planning, SFPUC
Arleen Navarret, Manager, Wastewater Planning and Regulatory Compliance Division, SFPUC
Denis F. O'Leary, Captain, Ingleside Station, Police Department
Lisa Pagan, Project Manager, Office of Economic and Workforce Development
Michelle Reyes, Planning Division, Recreation and Park Department
Andy Zanoff, Captain, Administrative Division, Fire Department

REDEVELOPMENT CONSULTANTS

Abbie Conlee, Managing Consultant, Seifel Consulting, Inc.
Marie Munson, Senior Managing Consultant, Seifel Consulting, Inc.

Helen Oliver, Managing Consultant, Seifel Consulting, Inc.
Pedro Peterson, Consultant, Seifel Consulting, Inc.

OTHERS

David Burch, Environmental Planner, Bay Area Air Quality Management District
Paul Cardoni, District Representative, State Projects, San Francisco Unified School District
Barbara J. Cook, P.E., Chief, Northern California Coastal Cleanup Operations Branch, State of California Department of Toxic Substances Control
Brad Drda, Environmental Manager, SF Recycling and Disposal Inc. (also Visitacion Valley CAC member)
Beth Goldstein, Hydroconsult Engineers
Jillian E. Gulderbrein, Researcher I, California Historical Resources Information System (CHRIS) Northwest Information Center (NWIC)
Steve Hansen, General Manager, Universal Paragon Corporation
Mary Hashem, Brownfield Partners
Virginia Lasky, former Project Manager, State of California Department of Toxic Substances Control
Ilaria Salvadori, former Urban Designer, Van Meter Williams Pollack
Jonathan Scharfman, Land Development Director, Universal Paragon Corporation
Chris Sensenig, Urban Designer, Van Meter Williams Pollack
John Swiecki, Principal Planner, City of Brisbane
Karen M. Toth, P.E., Supervising Hazardous Substances Engineer I, State of California Department of Toxic Substances Control

19.2 VISITACION VALLEY CITIZENS ADVISORY COMMITTEE (CAC)

Chris Barnett
Christina Charles
Robin Chiang
Brad Drda
Edith Epps
Douglas Fong
Inskip James
Michelle LaFlue
Fran Martin
Arcadia Maximo
Paul McLaughlin
Russel Morine
Tom Radulovich
Anne Seemen
Linda Bien (former member)
James J. Byrnes (former member)
Ulysses J. Cozart, Jr. (former member)
Jennifer B. Huang (former member)
Liz Lerma (former member)
Sue Ochoa (former member)
Frederick Parkinson (former member)
Lao Chon Wa (Jeff) (former member)
Neo Veavea (former member)

19.3 EIR TEAM

SAN FRANCISCO REDEVELOPMENT AGENCY
AND CITY AND COUNTY OF SAN FRANCISCO

Tom Evans, Lead Planner, Redevelopment Agency
Stanley Muraoka, Environmental Review Officer, Redevelopment Agency
Joy L. Navarrete, Senior Environmental Planner, Planning Department
Kenneth J. Rich, Associate Planner, Planning Department
Lisa Zayas-Chien, Project Manager, Redevelopment Agency

CEQA CONSULTANTS

John Wagstaff, Principal-in-Charge, Wagstaff and Associates
Ray Pendro, Project Manager, Wagstaff and Associates
Natalie Macris, Senior Contract Planner, Wagstaff and Associates
Steve Ridone, Wagstaff and Associates
Toni Fricke, Wagstaff and Associates

TRANSPORTATION CONSULTANTS

Timothy Erney, AICP/PTP, Transportation Engineering Department Manager, DMJM Harris/AECOM
Aruna Bodduna, Transportation Engineer, DMJM Harris/AECOM

HISTORIC RESOURCES CONSULTANT

Hishashi (Bill) Sugaya, Principal, Carey & Co., Inc.
Sarah Hahn, Architectural Historian, Carey & Co., Inc.
Matt Davis, former Preservation Planner, Carey & Co., Inc.

NOISE CONSULTANTS

Rich Rodkin, Principal-in-Charge, Illingworth & Rodkin, Inc.
Dana Lodico, P.E., Project Scientist, Illingworth & Rodkin, Inc.

AIR QUALITY CONSULTANT

Donald Ballanti, Certified Consulting Meteorologist

HYDROLOGY AND UTILITIES CONSULTANT

Andrew Leahy, P.E., Civil and Environmental Engineer

VISUAL SIMULATION CONSULTANTS

Marsha Gale, Principal, Environmental Vision
Chuck Cornwall, Principal, Environmental Vision

4. APPENDICES

4.1 Responses to June 26, 2008 San Francisco Planning Commission Meeting Comments on the Draft EIR

4.2 Responses to July 1, 2008 San Francisco Redevelopment Commission Meeting Comments on the Draft EIR

4.3 Responses to Written Comments on the Draft EIR

4.4 Remediation Status Update for Redevelopment Zone 1

4.5 Supplemental Transportation Analysis Information

APPENDIX 4.1

RESPONSES TO JUNE 26, 2008 SAN FRANCISCO PLANNING COMMISSION MEETING COMMENTS ON THE DRAFT EIR

The following appendices section includes a reiteration of those comments from section 3.2 (Responses to Comments Grouped by Topic) of this Final EIR document that were made at the June 26, 2008 San Francisco Planning Commission (PC) regular meeting, and a reiteration of the associated responses of the EIR authors from section 3.2. This section includes the minutes of the segment of the January 26, 2008 PC meeting devoted to the Visitacion Valley Redevelopment Program Draft EIR, including Commissioner comments and public hearing comments from members of the public. The PC minutes herein include an assigned letter-number code (e.g., PC-1, PC-2, PC-3, etc.) posted in the right margin next to each comment pertaining to CEQA or the adequacy of the EIR. The set of coded PC minutes is then followed by the EIR authors' summary of each comment and the EIR authors' written response to each comment. Where warranted, some responses include reference to revisions to the Draft EIR which have been made in response to the comment and included in section 4 (Revisions to the Draft EIR) of this Final EIR document.

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SAN FRANCISCO PLANNING COMMISSION

STATE OF CALIFORNIA

CITY HALL, ROOM 400

1 DR. CARLTON B. GOODLETT PLACE

PUBLIC HEARING ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

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THURSDAY, JUNE 26, 2008

VISITACION VALLEY REDEVELOPMENT PROGRAM

ITEM 14. 2006.1308E

REPORTED BY: E. BRUIHL, RPR, CSR NO. 3077

A REGISTERED PROFESSIONAL REPORTER

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A P P E A R A N C E S

PC

PRESIDENT:	CHRISTINA R. OLAGUE
VICE PRESIDENT:	RON MIGUEL
COMMISSIONERS:	MICHAEL J. ANTONINI
	GWYNETH J. BORDEN
	KATHRIN MOORE
	HISASHI SUGAYA
DIRECTOR OF PLANNING:	JOHN S. RAHAIM
PLANNING COMMISSIONER:	LAWRENCE BADINER
COMMISSION SECRETARY:	LINDA D. AVERY

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P R O C E E D I N G S

THURSDAY, JUNE 26, 2008 2:36 P.M.

COMMISSION SECRETARY: Commissioners,

PC

you are now on your regular Calendar.

Item No. 14, Case No. 2006.1308E, Visitacion Valley Redevelopment Program. This is a public hearing on the Draft Environmental Impact Report.

MS. NAVARRETE: Good afternoon, President Olague and Commissioners.

I am Joy Navarrete from the Planning Department staff and I am joined by Tom Evans of the Redevelopment Agency, who is the --

COMMISSIONER SUGAYA: Could you hang on for a minute?

MS. NAVARRETE: Sure.

COMMISSIONER SUGAYA: I have to recuse. Sorry.

I worked for a company that participated in the historic resource evaluation for both the Visitation Valley Legal (phonetics) and Diamond Area and Schlage Lock.

COMMISSION SECRETARY: We have a motion

for recuse from Commissioner Sugaya.

COMMISSIONER ANTONINI: Move to recuse Commissioner Sugaya.

COMMISSIONER MIGUEL: Second.

COMMISSIONER SECRETARY: We have a motion for recusal of Commissioner Sugaya:

Commissioner Moore?

COMMISSIONER MOORE: Aye.

COMMISSION SECRETARY: Commissioner

Sugaya?

COMMISSIONER SUGAYA: Aye.

COMMISSION SECRETARY: Commissioner Antonini?

COMMISSIONER ANTONINI: Aye.

COMMISSION SECRETARY: Commissioner Olague?

COMMISSIONER OLAGUE: Aye.

COMMISSION SECRETARY: Commissioner Miguel?

COMMISSIONER MIGUEL: Aye.

COMMISSION SECRETARY: Commissioner Moore?

COMMISSIONER MOORE: Aye.

COMMISSION SECRETARY: Thank you. Commissioner Sugaya is recused.

MS. NAVARRETE: Okay.

Good afternoon, President Olague and the Commissioners.

I am Joy Navarrete of the planning staff and I'm joined with Tom Evans of the Redevelopment Agency who is also -- who is co-lead agency to the Planning Department for this project.

The items before you today is a public hearing on the Draft Environmental Impact Report for Case No. 2006.1308E, the Visitation Valley Redevelopment Program.

Today's action is a public hearing on the adequacy and accuracy of the information contained

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in the Draft EIR and we ask that comments be focused on this.

There will be no decision today to approve or disprove the proposed project. That hearing will follow the final EIR certification.

Citywide Planning Staff came before you and with an informational presentation on the Visitacion Valley Program on January 17th, 2008, and will be returning for any initiation of the project around August 2008.

We are here today to receive comments from the public and Commissioners regarding the DRAFT EIR

as part of the environmental process required by California Environmental Quality Act or CEQA.

The public and Commissioners should note that the staff is not here to answer comments today.

Comments will be transcribed and responded to in writing in the Comments and Responses document, which responds to all comments received and makes revisions to the Draft EIR, as appropriate.

There is a Court Reporter here today and we ask that all commentors speak slowly and clearly and also we ask that you state your name and address so a copy of the Comments and Responses document can be mailed to you when we complete it and, after comments from the public, we will take your comments on the DRAFT EIR from the Commissioners.

The written comment period began on

PC

June 3rd, 2008, and continues until 5:00 p.m., Monday, July 21st, 2008.

This concludes my presentation and I ask the public hearing on the Draft EIR be opened.

PRESIDENT OLAGUE: Thank you.

I would like to open it up for public comment.

MS. MARTIN: My name is Fran Martin. PC 1

♀

I'm with the Visitacion Valley Planning Alliance, and we have worked for two years to get development at Schlage lock and we are really delighted that we now have a developer.

I haven't had a chance to go through the EIR. This is, you know, about this thick as usual but I do know I've read a little about the transportation issues and I don't see where we can do too much about that except one big thing that has to be done. PC 1.02

We need to have a Geneva extension and in order to relieve us from some of the traffic that's going to be caused and I would hope that the Planning Department would push for that and that, you know, that that happens not only for our neighborhood but also for Brisbane and Daly City and the redevelopment that's happening at Candlestick.

The other thing that is kind of not apropro at this moment but I really hope that we will be able to have a design review from our community through the whole process until the last nail is PC 1.03

PC

driven in.

That's it. Thanks.

PRESIDENT OLAGUE: Any additional comments on this item?

MR. BARNETT: Greetings.

My name is Chris Barnett. I'm a resident of Visitacion Valley and I'm also on the Citizens' Advisory Committee Report for this project and I'm in support of this project very strongly but I just want to second what Fran Martin had to say. PC 2

PC 2.01

I think the transportation issues and especially as regards to the Geneva extension and how this project will tie into developments that will happen in Executive Park, Candlestick Point, Bayview-Hunter's Point and in the Bay lines (phonetics) to the south where the County lines are all going to have a lot of impact on transportation and I think that planning issues should really focus on that particular issue and there was something else but I'm nervous speaking in front of people and I have forgotten but, primarily, I'm in favor of the project and just really I encourage the Planning Commission to keep a good eye on it and help us to steer it towards a successful resolving it. PC 2.02

PRESIDENT OLAGUE: Thank you and you have until July -- what is it -- 21st to submit comments. So, feel free to contact staff and submit your comments to us.

MR. MARTIN: Okay, thank you.

PRESIDENT OLAGUE: Uh-huh.

Is there any additional public comment?

AUDIENCE: (No response).

PRESIDENT OLAGUE: Seeing none, public comment on this item is closed.

Commissioner Moore?

COMMISSIONER MOORE: I strongly support the views expressed by the public regarding comprehensive transportation planning. PC 3.01

I brought that up when we talked about Point of View, when we talked about Hunter's Point, Seawall 377 and on and on and on.

I think the planning of that entire area in addition to the eastern neighborhoods needs to be done with one broad brush stroke.

Why we cannot implement it all at once, I think to think comprehensively here is I think where the City needs to go if it really wants to have a transportation for its policy, particularly with the overlay of cleaning, that will ever become more important.

That would be my only comment.

PRESIDENT OLAGUE: Commissioner Miguel?

COMMISSIONER MIGUEL: Yes. PC 4

I was, like, familiar intimately with the neighborhood a number of years ago when I served on

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the previous incarnation of the recreation park open space committee and we were providing the funds for the Visitation Valley playground, the clubhouse in that area.

So, I went back out and spent about three or four hours in the area just a week ago to refamiliarize myself with it and it has grown a great deal in housing since that time.

The lack of the Geneva extension developments and what it does to further development out in that area is also very very obvious and I would hope that the City departments involved actually work together on this. PC 4.01

They have done so at times and they have not done so at times and it is absolutely necessary.

So, I look toward to the point when this comes back to us and find that the transportation element of this has been more thoroughly thrashed out.

PRESIDENT OLAGUE: Commissioner Moore?

COMMISSIONER MOORE: I just want to make a comment to the staff. PC 5.01

I mean, the staff has done a really great job over the years to start with Leon Avenue, the neighborhood street improvements.

It's a wonderful street and it's really the beginning of what's best about San Francisco neighborhoods.

PC

From there, you go to Schlage Lock and then you start to really grab the entire piece.

So, I think it is a really powerful exemplary piece and while this is a catch word, I think I like to acknowledge the work which has been done by so many people and has all the really great times, I'd talk about the 3rd Street rail extension which is a really powerful piece in all of this.

So, a great job.

PRESIDENT OLAGUE: Commissioner Antonini?

COMMISSIONER ANTONINI: And I'm just looking at that issue of the Geneva Avenue extension and maybe I could ask staff in terms of, you know, how this relates to the project itself. PC 6.01

Are the two going to be done simultaneously? And is that or that is -- you know, I know this is beyond the scope of what we are looking at as far as the thoroughness because it is

analyzed but just as a matter of question how if you worked with the City of Brisbane and where are we on that area there in Daly City, of course?

MR. EVANS: Thank you, Commissioners. Tom Evans with the San Francisco Redevelopment Agency.

There is a few processes under play right now regarding Geneva Avenue extension which is also tied into a new interchange with Highway 101 and Harley (phonetics) Way which is in front of the

PC

Executive Park Development.

One is that Brisbane has applied to Caltrans for a preliminary study of the interchange which has its own process with Caltrans.

Separately, the County Transportation Authority has undertaken to buy County Transportation Study Round II.

We did this before in the late '90's to analyze issues of regional transportation needs around southeastern San Francisco and northeastern San Mateo Counties.

That process is taking a look at all the various developments in the area from Brisbane, Daly City, and in San Francisco and analyzing their impacts and contributions to transportation needs in

the area.

That process is underway right now and I believe they are going to have some recommendations for both -- all the jurisdictions in the Fall.

And thirdly, the transportation impact of the Candlestick project is being studied very thoroughly by the MBA staff and the Redevelopment staff.

So, we are looking at all of these issues together and one thing there will be I think very challenging is looking at fair share responsibility for these regional improvements upon each of the developments.

Finally, I might add that the TA just -- we

just got notice yesterday that the TA received planning money from the Prop 1-C fund to do transportation, transitory (phonetics) development and certain multi-mode of transit planning around the Bayshore Caltrans station where it will give us extra funds to look into not just how to do the Geneva Avenue roadway extension but looking in bikes, pedestrians and transit into this rapidly growing area.

Thank you.

PRESIDENT OLAGUE: Thank you.

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COMMISSION SECRETARY: Commissioners, I will assume the public hearing on this matter is closed and the written comments will be accepted at the Redevelopment Agency's offices until the close of business on July 21st, 2008.

With that, the matter is closed at the Planning Commission today. Thank you.

(CONCLUDED AT 2:50 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 were taken by 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 the hearing proceedings.

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.

PC

Dated: MONDAY, JUNE 30, 2008.

Easteller Bruihl, RPR, CSR No. 3077

San Francisco Planning Commission Meeting and Public Hearing; June 26, 2008

PC 1.01 (Martin) Project Merits--we have worked for two years to get development at Schlage Lock; we are delighted that we now have a developer

Response: This comment pertains to the merits of the Project--i.e., the overall Visitacion Valley redevelopment program effort--rather than to the content or adequacy of the Draft EIR. All such comments received on the merits of the Project will be considered by the Planning Commission, Redevelopment Commission and other San Francisco decision-makers in their future deliberations and actions on the proposed Project, and do not require any further written response in this Final EIR.

PC 1.02 (Martin) Transportation and Circulation--general concern about transportation issues--need for Geneva Extension--concern about one big thing that has to be done about the transportation issues raised by development at Schlage Lock: we need to have a Geneva Extension in order to relieve us of some of the traffic that is going to be caused; Planning Department should push for this for not only our neighborhood but also for Brisbane, Daly City, and the redevelopment happening at Candlestick.

Response: As discussed in the assessment of future 2025 Cumulative conditions, there are several future transportation infrastructure projects that would improve intersection operating conditions and help offset the anticipated increase in traffic volumes from the nearby major development projects. The proposed extension of Geneva Avenue between Bayshore Boulevard and the U.S. 101 interchange at Harney Way would help reduce traffic volumes on the local streets (like Tunnel Avenue) by providing a more direct route to and from the freeway. Currently, this extension and interchange project is included as part of the proposed development program for the Brisbane Baylands Specific Plan area. A separate environmental review and clearance procedure is underway by the City of Brisbane for both the specific plan program and the roadway extension. The Redevelopment Agency and Planning Department in conjunction with the Zone 1 development sponsors will work with the City of Brisbane in support of the new roadway, as appropriate. It should be noted, however, that this new facility would not be required specifically for the proposed Visitacion Valley Redevelopment Zone 1 development program, but would be needed to accommodate the overall development anticipated throughout the area.

PC 1.03 (Martin) Visual Factors--design review--hope that community will have design review input throughout the process "until the last nail is driven in."

Response: The specific development controls and design guidelines in the Design for Development will be subject to additional community review through the Visitacion Valley Citizens Advisory Committee (CAC) review process as they are finalized. In addition, future individual development applications in the Project Area will be subject to a specific design review procedure which has been included as Appendix F of the latest version of the *Visitacion Valley/Schlage Lock Design for Development* document. In summary, all new development proposals in Zone 1 will undergo design

review and approval by the Agency prior to issuance of building permits. This review will assure compliance with the requirements of the Redevelopment Plan, the Design for Development, and applicable sections of the Planning Code. The Agency and the Planning Department will work cooperatively to review all development proposed in the Project Area and ensure that all proposals comply with the Redevelopment Plan, the *Design for Development* and the Planning Code. The Agency and Planning Department will facilitate community review of proposals prior to their final approval. The Agency will delegate to the Planning Department responsibility for administering the Planning Code in Zone 2 of the Project Area.

The *Design for Development* Appendix F stipulated design review process will allow city staff and community members to evaluate the quality and appropriateness of each development proposal on the basis of the design objectives, development standards and urban design guidelines stated in the *Design for Development*. This review will serve to coordinate individual design efforts and realize the best possibilities inherent in each project while increasing the overall visual harmony and enhancing the broad physical planning objectives of the project site.

A broad outline of the design review process is now described in Appendix F of the *Design for Development*. The process will include a Design Review and Document Approval Procedure (DRDAP) agreement to be established between the Project Sponsor and the Agency detailing clear design review procedures, including timelines for review and applicant submission requirements.

The design review process will be conducted cooperatively by the Agency and the Planning Department. At the discretion of the Agency, a qualified independent individual or review panel may be selected to make design evaluations and recommendations to the Agency and Planning Department. The Agency will be responsible for the design review process and maintaining liaison with the developer's architectural design team, and formal required submissions will be made to the Agency.

Designs for new development will be reviewed by an inter-agency project review team. This review will occur before critical decisions in the design process are made and will include review of Major Phase plans, Schematic Design plans, Design Development plans, and final construction plans and specifications. It is expected that continuous contact will be maintained between the developer's architect and the City's design review staff during the draft design and working drawing process.

Advice and consultation regarding proposed developments will also be sought by Agency staff from the Visitacion Valley CAC. All Major Phase and Schematic design approvals will be made by the Redevelopment Commission at a public hearing after review by the Visitacion Valley CAC and Planning Department.

PC 2.01 (Jackson) Project Merits--very strongly in support of this project.

Response: Please see response to similar comment PC 1.01 above.

PC 2.02 (Jackson) Transportation and Circulation--general concern about transportation issues--need for Geneva Extension--cumulative impacts of anticipated southeast area development--transportation issues warrant focus, especially with regard to the Geneva Extension and how this project in combination with Executive Park, Candlestick Point, Bayview-Hunter's Point and the Bayside development area to the south in Brisbane are all going to have a lot of impact on transportation; planning activity should focus on this particular issue

Response: The 2025 Cumulative conditions scenario, as assessed in the DEIR transportation section, includes the anticipated development throughout the area, including the proposed Executive Park, Candlestick Point, India Basin Shoreline, Hunters Point Shipyard Phase 2, Brisbane Baylands Phases 1 and 2, and Daly City Cow Palace development projects, as discussed on pages 8-26 and 8-27 of the DEIR. Environmental review documents are also being or will be prepared for each of these projects to further address their specific contributions to the cumulative impact of all of these potential developments. In addition, as indicated in response to comment LR 11.06 herein, there are several city-, county- and interjurisdictional assessment and planning efforts currently underway to address the long-term transportation and circulation improvement prioritization and funding for the developing areas on both sides of the San Francisco/San Mateo County line, including the ongoing Bi-County Transportation Study being led by the San Francisco County Transportation Authority (SFCTA) in partnership with the City of Brisbane, San Francisco Planning Department, San Francisco Redevelopment Agency, San Francisco MTA, San Mateo County Transportation Authority and Caltrans.

PC 3.01 (Commissioner Moore) Transportation and Circulation--general concern about transportation issues--comprehensive planning approach needed--strongly supports views expressed by commenters (PC 1 and PC 2) regarding the need for comprehensive transportation planning; planning for entire southeast area and overall eastern neighborhoods needs to be done "with on broad brush stroke"; development in these areas needs to be considered comprehensively.

Response: Each proposed development in the southeast San Francisco/ north Brisbane/west Daly City area has its own phasing and timeline. While it is logical to assume absolute consistency between projects in the cumulative analysis, given the time constraints present with each project and the constantly changing land use programs, ensuring complete EIR analysis consistency among all area projects would be difficult. Each project EIR analysis is being conducted consistent with the land use programs and other relevant information available at the time the associated NOP was published. In addition, the intent of the current Bi-County Transportation Study is to address the comprehensive transportation planning needs for the southeast area and vicinity described in this comment (see response to comments PC

4.01 above and LR 11.06 in section 2.2.2--Project Consistency with Local and Regional Plans--herein).

PC 4.01 (Commissioner Miguel) Transportation and Circulation--need for Geneva Extension--need to clarify transportation impacts and mitigations--involved City departments should work together on this; looking toward the point when this project comes back to Commission with the transportation element thoroughly flushed out.

Response: Comment noted. Efforts to study and evaluate the potential extension of Geneva Avenue between Bayshore Boulevard and U.S. 101 are currently underway, including the Brisbane Baylands Specific Plan and EIR program and the interjurisdictional Bi-County Transportation Study (see responses to comments PC 4.01 above and LR 11.06 in section 2.2.2--Project Consistency with Local and Regional Plans--herein). In particular, the Bi-County Transportation Study is addressing the need for interjurisdictional transportation improvement prioritization and funding, and the combined effects of the local and regional projects proposed in the area. Staff from various departments and agencies within the City and County of San Francisco, the City of Brisbane, County of San Mateo and Caltrans have been substantially involved in this effort, and will continue their involvement through the remainder of the Bi-County Transportation Study and design process.

PC 5.01 (Commissioner Moore) Project Merits--staff has done an excellent job in this area over the years, starting with neighborhood street improvements an now the planning for Schlage Lock--would like to acknowledge work done by so many people, including the Third Street light rail extension which has been a powerful piece in all of this--so, great job.

Response: Please see response to similar comment PC 1.01 above.

PC 6.01 (Commissioner Antonini) Transportation and Circulation--need for Geneva Extension--how does the Geneva Extension issue relate to this project--are the two going to be done simultaneously; has staff been working with the City of Brisbane on this?

Response: The City of Brisbane is the lead agency for the potential Geneva Avenue Extension and the associated Baylands Specific Plan Phase 1 and 2 project. The City of Brisbane has completed and submitted a Project Study Report (PSR)[1] to Caltrans for the proposed extension, widening and realignment of Geneva Avenue in Brisbane; and in a coordinated effort with the San Francisco DPW, has also submitted a PSR to Caltrans for construction of the Geneva/Harney Way/U.S. 101 interchange, with three alternative approaches (alignments and configurations) for the Geneva/ Harvey interchange described, including an alignment underneath U.S. 101, and an overpass interchange component in both cloverleaf and diamond interchange configurations. These are completely separate projects from the proposed Visitacion Valley Redevelopment project, for which the San Francisco Planning Department and San Francisco Redevelopment Agency

[1]A Project Study Report, defining and justifying a proposed regional transportation improvement project's scope, cost and schedule, is required before a project may be included in the State Transportation Improvement Program (STIP).

are co-lead agencies. The extension of Geneva Avenue would help improve vehicular circulation throughout the area. Its analysis/approval/ construction process is not connected exclusively to the proposed Visitacion Valley redevelopment program, but rather is linked to all of the numerous development projects currently being considered in the area, including the Brisbane Baylands Specific Plan formulation program as well as the Executive Park, Bayview Waterfront (Candlestick Point, India Basin Shoreline, Hunters Point Shipyard Phase 2), and Daly City Cow Palace development projects. The City and County of San Francisco has been working in coordination with the City of Brisbane, San Mateo County and Caltrans throughout its planning and development review process for those projects located in San Francisco and will continue to work together with these agencies, as appropriate.

APPENDIX 4.2

RESPONSES TO JULY 1, 2008 SAN FRANCISCO REDEVELOPMENT COMMISSION MEETING COMMENTS ON THE DRAFT EIR

The following appendices section includes a reiteration of those comments from section 3.2 (Responses to Comments Grouped by Topic) of this Final EIR document that were made at the July 1, 2008 San Francisco Redevelopment Commission (RC) regular meeting, and a reiteration of the associated responses of the EIR authors from section 3.2. This section includes the minutes of the segment of the July 1, 2008 RC meeting devoted to the Visitacion Valley Redevelopment Program Draft EIR, including Commissioner comments and public hearing comments from members of the public. The RC minutes herein include an assigned letter-number code (RC-1, RC-2, RC-3, etc.) posted in the right margin next to each comment pertaining to CEQA or the adequacy of the Draft EIR. The set of coded PC minutes is followed by the EIR authors' summary of each comment and the EIR authors' written response to each comment. Where warranted, some responses include reference to revisions to the Draft EIR which have been made in response to the comment and included in section 4 (Revisions to the Draft EIR) of this Final EIR document.

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STATE OF CALIFORNIA

CITY AND COUNTY OF SAN FRANCISCO

REDEVELOPMENT AGENCY

REGULAR MEETING

TUESDAY, JULY 1, 2008 - 4:00 P.M.

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A P P E A R A N C E S

PRESIDENT:	FRANCEE COVINGTON
VICE PRESIDENT:	LONDON BREED
COMMISSIONERS:	LINDA A. CHEU
	LEROY KING
	RAMON E. ROMERO

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P R O C E E D I N G S

TUESDAY, JULY 1, 2008

COMMISSION SECRETARY: The first

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hearing order of business on the regular agenda is Item 4(b): Public hearing to hear all persons interested in the Draft Environmental Impact Report for the Visitacion Valley Redevelopment Program.

Mr. Director?

MR. BLACKWELL: Thank you, Madam Secretary.

This item will be presented by Stan Murioka (phonetics) who is with the Planning Redevelopment Agency.

MR. MURIOKA: Thank you, Director Blackwell.

Good afternoon, President Covington, Commissioners. I'm Stan Murioka (phonetics) of the Redevelopment Agency staff.

The matter before you is a public hearing on the adequacy of the Draft Environmental Impact Report for the proposed Visitacion Valley Redevelopment Program.

The Visitacion Valley Redevelopment Program

has been before you in previous meetings and workshop forums and consists of a proposed redevelopment plan, a design for development, amendment to the San Francisco General plan and amendment to the San Francisco Planning Code.

The item before you this evening is not the proposed redevelopment program but, instead, on the Draft Environmental Impact Report and its adequacy.

This is one of two scheduled public

RC

hearings. The first public hearing was held last week before the Planning Commission.

Tonight is the public hearing before you ladies and gentlemen and, at this time, I would ask that you open the public hearing to hear public testimony from the audience and from yourselves.

Staff is present but our role here is to listen and listen intently and we will come back to you at the close -- after the close of the public comment period which ends on July 21st with a comment and responses document that responds to each and every comment on the adequacy of this environmental document and, at that time, we would propose that you consider making a decision on the adequacy of the environmental document.

President Covington, if you will?

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PRESIDENT COVINGTON: Thank you, Mr. Murioka (phonetics).

All right. We would like to hear public comments on this Draft Environmental Impact Report for the Visitacion Valley Redevelopment Program.

Madam Secretary, do we have cards for this item?

COMMISSION SECRETARY: Yes. I have two speakers, Espanola Jackson, Public Rights, and Francisco Da Costa.

MS. ESPANOLA: First, I would like for the watch that -- whoever is Visitacion Valley speak.

RC

MR. MORINE: Okay. My name is Russel Morine. You have my card. RC 1.01

I'm a resident of Visitacion Valley and I'm a member of the Visitacion Valley CAC, Citizens Advisory Committee.

I know this meeting -- this hearing today is to make comments on the EIR which is a huge document and I can't say that I have read it all but I have read enough of it to say that it is a very thorough document.

It has pretty much everything we need to know to make our decision as a community and I do

hope that we have enough time to go through it. RC 1.02

Just two comments that I'd make on something that I think we could work on a little bit for the staff and for the next round of these hearings.

The traffic is definitely a look at the issue. It is identified in the document that traffic will be basically almost gridlock at certain hours of the day.

The document goes through different pieces of litigation steps but I think it is very clear there are several pages, no maps really of how the mitigation measures are going to be addressed exactly so that the staff maybe adequate maps with new intersections, new exchanges.

Also minor issue, there is comments about our library, Visitacion Valley is going to get a new RC 1.03

RC

library.

This was part of a planning process before this redevelopment was officially adopted or started to move forward.

There is comments in the document that state that the library permit size is based on population projection.

I think those population projections were

based before this document came up. We are talking over six thousand new residents in the neighborhood and it is just a little bit inconsistent with what we had planned for our library and the projected population figure.

So, if the staff could maybe look over that and just clarify it down the road.

Other than that, I'm satisfied with what I have read with the document. I'm sure that we will have other comments as we go but I'm just here to support the program and, hopefully, we can have this moved very smoothly and maybe by December have an actual redevelopment area. Thank you.

COMMISSION SECRETARY: The next is Espanola Jackson.

MS. JACKSON: Thank you very much. RC 2.01

Espanola Jackson, Bayview-Hunters' Point.

I haven't read the EIR. I haven't seen it but I saw on your Agenda it was going to be discussed today. I thought there would be someone making a point about what's going on in the area.

RC

One of the things I'm concerned about is the fact that there is a lot of plans being made, you know, surrounding my area which is Bayview-Hunters' Point, the South Bayshore Plan, and this is the same as Visitacion Valley.

They have concerns about as we do at Bayview-Hunters' Point about the traffic matters that is going on that will happen coming from Brisbane to Bayview-Hunter's Point.

As you all know, the South Bayshore plan was established back in 1992 and I was part of that.

So, I'm hoping that I can get a chance to read and look at how it will affect Bayview-Hunter's Point and I asked them in the back because I didn't know who was the contractor that did the EIR and was any mention done at all about the Bayview-Hunter's Point area, the traffic that's coming from let's just say from Bayshore through Bayview-Hunter's Point 3d Street.

I don't believe that a lot of people know how the area is constructed with the Bayshore area. We are from -- we start at Cesar Chavez to Highway 101 and from South Bayshore to the Bay.

That's a very large area, and I have attended some of the meetings over there in the area and I had concerns about the fact of the clean-up.

One of the things that has not happened and no discussion has been done in my area concerning the spills of things that have happened in that area

and I believe the neighborhood group before was Paragon.

Universal Paragon was a developer that first came into Bayview-Hunters' Point back in the '70s but they have bought all the property, you know? RC 2.02

They are going to be involved, and since you are involved, I would just like to know whether or not you will be responsible, who will be responsible for the clean-up of that area because I know the City doesn't have money and I know it is going to be over two or three billion dollars to clean that area.

Thank you very often.

COMMISSION SECRETARY: The next speaker is Francisco Da Costa.

MR. DA COSTA: Commissioners, my name is Francisco Da Costa and I'm going to address some comments on this Draft Environmental Impact Report. RC 3.01

First and foremost, Commissioners, you must have a very clear understanding that the area that we are talking about is the last frontier and what's happening here is like there is this train that's moving very very fast.

We already have nearby over 2,558 acres

impacted which you know as the Bayview-Hunter's Point and if you Commissioners have any sense about

RC

time lines and goals, then you can figure out and find out how fast this development or this train is moving and how it has impacted the community.

A Draft Environmental Impact Report or study is the right time to involve the community in a meaningful discussion.

You can give the consultants or the people that prepare the environmental impact report all the money they need to create a fact or a thick document but if really you do not get the input from the community, this Commission has failed.

When I worked at the Presidio of San Francisco, we had ample environmental impact studies and reports, mostly studies.

We always had a dialogue and incorporated the community. That's the way you get the best input.

Now, missing in the Draft Environmental Impact Report is the general data, empirical data linked to the housing element. RC 3.02

Missing is the thorough analysis of the cumulative pollution, where the Schlage Lock is and the neighboring area was impacted not only by the

activities of the Schlage Lock but by the operations of Santa Fe.

Not very far, you have the petroleum tanks and we need to find out if we build thousands and thousands of homes how the cumulative -- what will be the cumulative impact on the people that live RC 3.03

RC

here.

If we build homes next to the rail yard and the trains are passing, we need to address that. RC 3.04

So, what I am saying is, Commissioners, please. This is the last frontier. It really -- the land really belongs to the first people.

PRESIDENT COVINGTON: Mr. Da Costa, will you please wrap it up?

MR. DA COSTA: Give me fifteen seconds, please.

This is the last the frontier. This land belongs to the first people. If you read the history, it was stolen from the first people.

The list which I view is to get the people to sit down so that they get the best and we can only give the people the best if we address quality of life issues.

Thank you very much.

COMMISSION SECRETARY: The next

speaker is Daniel Landry, followed by Archbishop King.

MR. LANDRY: Good afternoon, Commissioners, to the audience, people aboard and to the City. RC 4.01

I want to state -- a black San Francisco meeting this week, and it is quite odd that in the City we live in at this very moment that the state of black folks has diminished to its worse condition ever.

RC

Now, what's interesting not only the state of black San Francisco, the state of San Francisco like Brother Francisco just said so well profoundly, when you are dealing with an environmental study, environmental impact and when you are dealing with big business, it comes a point where you have to as a body that represents the people make a decision.

Unfortunately, the noise (phonetics) bankrupt. Unfortunately, corporations continue to beg from the state, from the Feds, and even locally while people are suffering.

I think we need to again reassess and we need to somehow sit down with those who have predicted how we would get out of this problem we are in.

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We can't continue to put blinders on when you see a -- we went to Vallejo last week and we informed Mayor Davis in the City of Vallejo that, you are bankrupt, basically, because due diligently speaking, you didn't take heed to the call and Ms. LaNora and Mare Island, the same thing happening out here in Bayview-Hunter's Point, we don't want to see San Francisco go bankrupt.

They are out here counting stamps. This is how broke Vallejo is.

So, if we are going to have a true transition in the Western Addition, if we are going to really make this City for everybody to enjoy other than, again, dogs, rich people jogging,

RC

walking around and bumping into people, looking at people crazy, then we need to speak honest truth and we need to do it not only an impact study environmentally speaking, we need to do a study of what the hell is going on here because it is shameful that this body as well as the supervisors can't see the writing is on the wall.

Every where I turn, I see everybody broke. So, if there is going to be some development going on out at Bayview-Hunter's Point, Visitacion Valley, don't matter were you target it, Mission Bay, we

then need to have some honest dialogue because you know and I know all the scientists are saying it's not if and when an earthquake will happen, it's when and I think I can speak to that as a co-coordinator of the Western Addition when it comes to Nerf (phonetics), I can speak to that because a disaster is hanging over our heads.

So, let's not take this lightly. Let's pay attention and let's be real resolved when it comes to the decisions we make because this whole City's survival is at stake.

Thank you.

COMMISSION SECRETARY: Archbishop King. (No response) Archbishop King?

VOICE IN AUDIENCE: I'm not ready.

COMMISSION SECRETARY: Randall Evans?

MR. EVANS: President Covington, Vice President London Breed and the rest of the

RC 5

RC

Commissioners, Fred Blackwell, staff, people in the audience but, most importantly, the capable listeners.

You see, most of time I'm up here, you guys hear me. You are very compassionate. You hear me talk when I should be quiet.

You hear me just making statements when I should be listening.

Commissioners Romero has pointed it out pretty clearly and Brother Fred Blackwell pulled my coat tail on Fillmore Street.

What I am really trying to say here today is to tell you listeners it's unfortunate but it is an established fact.

I have been coming to these meetings for thirty-one years and I think that's more than almost any of you have been Commissioners with the exception of Leroy King.

Here is my point. For the last three or four months, not one word from anybody from the community has been recorded in your Minutes.

RC 5.01

I called your secretary and asked what's the reason for that. She tells me she is under the direction of President Covington but here is the problem.

You guys think that you spend your time and it's your money when it comes to --

PRESIDENT COVINGTON: Mr. Evans?

MR. EVANS: I'm speaking on an

RC

item that has to do with the people's voice.

PRESIDENT COVINGTON: Mr. Evans?

MR. EVANS: Yes, ma'am?

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PRESIDENT COVINGTON: This item is about the Draft Environmental Impact Report.

MR. EVANS: Oh, speaking on this Draft Environmental Impact study, I also would like to let it be known that if our voices are not heard in your Minutes, what difference does it make for us to be up here speaking, President Covington, if, in fact, that tape is supposed to have one hour of our time dedicated to us after this where we could speak about it just in case too many us out here speaking on the environmental impact study of this particular draft and no one can hear our invoices?

What do we have left to do? So, here is my point. I believe by the rights that we have here that there should be a letter draft stating the reason why and the whole concept of the contract you have of a pay pool and let's take into consideration that we should be able to speak so far when I have attempted to do that in a timely fashion with the people that are capable.

Not pointing at any fingers, but I was told by a particular Commissioner that we placate.

So, basically, if we come up with a reason to have a talk show has to do with some of the things that's happening here so it's

17

(unintelligible), how do we win if we don't get our voices out?

Thank you.

COMMISSION SECRETARY: Archbishop King, are you ready?

ARCHBISHOP KING: No.

COMMISSION SECRETARY: He is the last speaker.

PRESIDENT COVINGTON: All right, thank you.

Are there any members of the public who did not fill out the speaker card that would like to speak on this item?

Did I see a hand up? No? That was just moving of hair (Laughter)? Okay. All right.

I will close public comment and go back to Mr. Murioka. You had some comments before we go to the Commission members?

MR. MURIOKA: Thank you, President Covington.

At this time, I respectfully ask if any of the Commissioners have any comments on the Draft EIR so that we may record and respond to those as well?

PRESIDENT COVINGTON: Okay, thank you.

All right, public comment is closed. Mr. Murioka (phonetics) has heard his comments and I

RC

will go to my fellow Commissioners, beginning with Commissioner Swig.

COMMISSIONER SWIG: The two areas that I had a question on. One, I, too, was confused by the traffic piece. RC 6.01

I think it's -- it makes it sound like Manhattan at its worse rush hour disaster and I couldn't make hide nor hair of it and I think that I concur with the comments made and public comments that there should be clarification on that.

It makes it sound as if it is permanent gridlock out there and I'm familiar with the neighborhood and although I probably cannot envision what it will be once there is residential housing and other components built on the shore block piece, I still have a hard time experiencing or envisioning the massive gridlock that seems to me reflective in the EIR. So, I think there needs to be some clarification on that.

With regard to the -- I have a question, please, and is it the recommendation -- is it the final recommendation and conclusion and I'm referring to the executive summary which is probably

the easiest piece of this bible that we get to. RC 6.02

On Page 262, Section 2.5.2, is it therefore the recommendation of the EIR that alternatives two which includes 735 residential units, 130 to 1,000 square feet of retail, et cetera, et cetera, be the result of this project?

RC

Or is -- are all six alternatives still a condition? It seems that the recommendation moves forward, too. Am I over-reading on this?

MR. MURIOKA: Actually, that is a requirement of the state environmental laws.

The purpose of the EIR is to project what would happen if we were to go ahead and build according to the redevelopment program, the main project that is described in the body of the document.

The alternatives are looking at different versions or different scenarios, if you will, and it distinguishes the difference in impacts between the proposed project and the different scenarios.

What state environmental law, CEQA, requires us to do is to identify if there is one what is called an environmentally superior alternative, that is, the one that has the least adverse impact and so that is the disclosure

statement that you are reading there.

It clearly identifies what would be considered environmentally superior.

The end environmental document, we are not making any recommendations for one alternative over another or over the preferred project.

That is for the Commission to deliberate once we complete your environmental document.

COMMISSIONER SWIG: Is it appropriate and I look to Mr. Morales for some guidance on this,

RC 6.03

RC

is it appropriate in the EIR to or legal in the EIR to rank the most environmentally positive items?

Clearly, alternative No. Two is, according to what you just said, but is that which is the least environmentally offensive but I would like to know what is No. 2, 3, 4, 5 and 6.

Is that something that would be appropriate in this EIR so that we as Commissioners can evaluate more thoroughly other alternatives and get an opinion of when on those with regard to the environmental impact?

MR. MURIOKA: All right.

Typically, we do not do that in an environmental document.

What we are required to do is to identify

if there is one the most I guess environmentally sensitive alternative, if you will.

However, I would add a caution to that and that is that we just run a what-if scenario on the project and on the alternatives and there are many factors that really sort of... for example, the number of housing units and particularly the number of affordable housing units that would be included in the program and one program versus an alternative.

And so, at the end of the process when staff comes before you asking for consideration of the proposed redevelopment program, the environmental impact document, the one you that you

RC

are reading from today is one of many considerations that you as a Commissioner and the entire Commission will be asked to make.

And so, there are considerations of physical environmental impacts which proposal would have fewer impacts than another and that would have to be considered in light of mitigations. The EIR identifies certain mitigations with the application of mitigations.

Some of the impacts that are identified would either be precluded, would not occur, or would

be reduced to what generally the technical specialist considers to be a less than certain development (phonetics).

There is some impact but it would generally not be noticeable and you would be asked to consider those mitigations along with what are considered to be the benefits of the project.

In other words, what are you gaining by following a particular redevelopment proposal as opposed to following an alternative?

COMMISSIONER SWIG: And how would you suggest -- how would you suggest in consideration of all of those elements which I agree we will be considering, how would you suggest that we be able to filter this information effectively?

RC 6.04

Because if No. 2, again, is your recommendation with minimal -- the most minimal environmental impact, how do we know that No. 3,

RC

just arbitrarily is slightly worse but No. 5 might be by comparison significantly worse?

I understand that there will be -- we can go through our list of mitigations but how would you suggest to the Commissioners that we will do this so we can understand which have the most dynamic environmental impacts and which would have the least?

Again, I'm looking for a ranking but I'm not asking you to rank but, rather, to instruct us how we might evaluate this environmental impact report more thoroughly.

MR. MURIOKA yes, Commissioner Swig.

Mr. Evans, my colleague at the Redevelopment Agency, has pointed to Page 17-7 which contains a table of the different alternatives and compares them against various environmental factors. It does not rank them for you but it does contain a comparison.

As I alluded to earlier, typically, an environmental document, we don't go through any rank of the project versus the alternatives but we do disclose what would be the differences in impacts and this table does that.

I think that for the purpose of the environmental review, our goal and our objective is really to look at potential physical impacts from a development proposal as objectively as possible and disclose that information to you and your fellow

Commissioners as decision-makers and that is the goal of the Draft EIR.

The goal in terms of taking public

testimony is to listen to what people have to say about our environmental document and come back to you with responses to your comments along with any changes in the environmental document that are appropriate.

And so, that is something that I can only advise you on and that is to say that we would go back and we would take a look at the alternatives and, if there is a ranking that comes forth, that may be something that we would include in the responsive comments but it is very hard to say which alternative is more important than another.

And so, what we have tried to do in this document and what we generally try to do is to lay out for you the ranges of impacts, whether they are traffic impacts or public services impacts or hazardous material impacts or so forth.

When we do come back to this Commission and ask that you consider the project, we would first ask that you certify that the environmental impact report was prepared in an objective and adequate manner.

That is one step and that is purely on the objectivity of this document.

The next step would be to ask you to

RC

consider the redevelopment program and, at that time, we would have to provide you with information so that you could make a decision on the project based on weighing the environmental factors along with the other benefits or disadvantages or consequences, if you will, of the project.

And so when you look at the totality of all of these effects, the environmental effects, the social effects, the economic effects, and consider that, then at that point, you know, we may come back to you with a report that tries to quantify if that is the desire of this Commission and --

COMMISSIONER SWIG: I would point out -- I understand where you are going and I appreciate it and I want to thank you for pointing out the 17-7 because it really -- when you are going through... I don't know the members of the audience who haven't seen this, it is pretty thick, and I haven't committed it to memory and also the regular audience obviously can't see the several hundreds of paged documents which is basing it but it is always good to have that page and I appreciate you pointing that out. That will help us in regards to getting better with regard to this.

Thank you.

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COMMISSION SECRETARY: Commissioner Breed?

COMMISSIONER BREED: Thank you.

RC 7

RC

I just had a quick comment. I noticed that there didn't seem to be a lot of people who commented on this item and I just want to make sure in moving forward that there is more community outreach that we send letters to the zip codes that will be vastly affected by this plan in moving forward and isn't there a CAC that has been working with Redevelopment in this Valley on this Seacomer (phonetics) project?

RC 7.01

MR. EVANS: Commissioner Breed, Tom Evans of the Redevelopment Agency.

We have been working with the CAC for two years, appointed by the Mayor. Russel Marin who spoke earlier under the CAC Planning Commission and they have two other CAC members testified and they have all received a copy of this document and the commissioned it (phonetics) as part of this hearing.

COMMISSIONER BREED: Have you sent out notices to the zip codes that will be affected by this particular project?

RC 7.02

MR. EVANS: We've sent out notices to three thousand addresses, including everyone who

received and was appropriated as part of the area boundary.

Everyone who is on our CAC mailing list has been notified this is being mailed to us and our exhausted list provides for our Planning Department within limits with the EIRs City-wide, including various City agencies that are impacted by the EIRs.

RC

COMMISSIONER BREED: And it's in different languages because there are people who speak different languages.

MR. EVANS: The notice was posted digitally in Chinese.

COMMISSIONER BREED: Okay.

PRESIDENT COVINGTON: I would only suggest that in moving forward because this is a really explored project that we make sure that we are somehow doing our due diligence in communicating this to that community either through their churches or through their organizations or other entities that already exist and not forcing them to come to the table at the CAC or the Commission level, if necessary, but that we do what we can to make sure that they understand what this will mean for the community because things will change.

RC 8.01

MR. EVANS: Will do.

PRESIDENT COVINGTON: Thank you, Mr. Evans.

COMMISSION SECRETARY: Commissioner Cheu?

COMMISSIONER CHEU: This is along those the lines and perhaps we can clarify for the public and our radio listeners, the reviews may actually go through on July 27th?

So, maybe you can clarify that if people do have comments and they want to come up here and speak, they can submit them alternatively.

RC 9.01

RC

MR. EVANS: Yes.

Comments need to be made by writing to the Redevelopment Agency at One South Van Ness, 5th Floor. Send them to me, Tom Evans, and our zip code is 9413 -- 103.

There is also information on-line on our website and have copies of the EIR available at our front desk. They are also available at the Planning Department information counter at 1650 Mission.

We also have copies of the Environmental Impact Report at the public library, both with the main branch and -- well, actually, the branch library on Newman (phonetics) Avenue.

There are also copies available at the

community centers, both on... at two different community centers that will be posted in that one zone.

The other one is on 50 Rec Raymond (phonetics). So, and anyway, we've -- and we also posted the entire neighborhood with the Planning staff to make sure that posters were up.

So, if you have no other way of encountering EIRs, simply walk down the street and see that posters on your own for review.

PRESIDENT COVINGTON: Thank you. RC 10

Any other Commissioners who would like to speak on this project? All right.

I have a couple of questions. I'm looking at the notes for either Mr. Evans or Mr. Marin or

RC

RC 10.01

either one.

I'm looking at Page 19-1 which listed the organizations and persons contacted and the EIR consultant team and I don't see the names of the CAC listed there, who worked with the CAC.

MR. EVANS: The -- once again, Tom Evans from the Redevelopment Senior staff -- Planning staff.

The EIR team is the technical advisory team that's listed here on 19.2 and....

PRESIDENT COVINGTON: I was referring to 19.01.

MR. EVANS: 19.01.

I believe we can certainly add the CAC members to that list. I don't see any problem with that. They certainly have been notified throughout the process and were involved in scoping this document. So, that correction can be amended.

PRESIDENT COVINGTON: Thank you and how many members are there of the CAC?

MR. EVANS: There are nineteen members.

However, I must say that a few of them have been less active recently. Actually, let me correct that. There are eighteen members at this time because one of our members passed away.

PRESIDENT COVINGTON: Okay, and under the City and County of San Francisco, I see that there are a couple of people who have changed

RC

positions.

Have the -- have their successors to their positions been included in this process?

MR. EVANS: Could you assist me with who you are --

PRESIDENT COVINGTON: Bernie Standup

(phonetics), and generally Supervisor Maxwell for at least a year, maybe a year and-a-half.

MR. EVANS: That's true, and we have been in contact with John Lau (phonetics). He's -- he's a staff member now for Supervisor Maxwell (phonetics).

Although where he stayed was involved at the beginning of the Sierra which is similar for the list for Supervisor Ames (sic).

PRESIDENT COVINGTON: All right. If you can update this list, that would be helpful.

Also, do you have a Power Point or slides or any individual materials for the group of photographs that begin with 7.2?

MR. EVANS: I don't have them here for Commission review in a Power Point format.

I can certainly have them projected on the overhead if that would help.

PRESIDENT COVINGTON: Yes. That would help for one or two of them just so that I can understand what I am looking at and orient myself a little better.

MR. EVANS: Is there a particular

RC

view you'd like to --

PRESIDENT COVINGTON: 7.3. We can

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begin with that one.

That would be visual simulation of proposed projects, 3.2 from San Bruno Avenue. As we've seen them looking south.

MR. EVANS: All right. I'm trying to get them on.

PRESIDENT COVINGTON: Sure, no problem. I will --

MR. EVANS: So, I have centered it on the view of the proposal. I assume that that is what you wanted to look at?

PRESIDENT COVINGTON: Yes. Can you tell me what I'm looking at?

RC 10.02

MR. EVANS: That view is looking down from San Bruno Avenue to the northwestern corner of the property.

Currently, there is a -- in the existing view a 1960's office building that can be seen and a small portion of an old industrial building that we refer to as the Saltess (phonetics) building.

PRESIDENT COVINGTON: I'm sorry. What's that?

MR. EVANS: Saltess (phonetics) building.

That's referenced as a type of design.

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They are allowed like to come into the work space and that proposal as shown below is a view of what -- is what I was trying to make like a worse case scenario with very little design review from staff worked community.

What would happen under -- in the initial development that was allowed to reach heights of forty or fifty feet and with very little massing, articulation and so forth and as you read the document, it is one of the impacts that is addressed, is that they need to provide further articulation in the design for development and a breakdown mass in the building.

PRESIDENT COVINGTON: So, are all of the depictions worse case scenario?

RC 10.02 (CONT.)

MR. EVANS: That's the way I would put it which is they are all a kind of marvelistic (phonetics) development without --

PRESIDENT COVINGTON: I can't tell you what a relief that is.

MR. EVANS: This is not -- well, I can't say that out loud. This is not a proposal for architecture.

PRESIDENT COVINGTON: Okay. Where are we?

Moving back to 17-7, the chart here that you referred to earlier?

MR. EVANS: Of the alternatives?

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PRESIDENT COVINGTON: Yes.

MR. EVANS: Yes.

PRESIDENT COVINGTON: So, alternative No. 1 is no project in the expected roof. Alternative 2, reduced housing in the redevelopment zone one. RC 10.03

What does that mean, "reduced housing"?

MR. EVANS: So, that was to -- you could not build on -- the zone one just for clarification is the Schlage Lock, corner of Schlage Lock industrial site and the neighboring railroad properties that are all of the area that we consider to be -- the area for the most aggressive redevelopment and so that the proposal in a project is for twelve hundred new housing units.

The alternative of two would reduce the number of housing units by nearly fifty percent to create an alternative that had less housing and thus less traffic impact at the intersection on Bayshore Boulevard.

PRESIDENT COVINGTON: All right, thank you for that clarification and my final question is RC 10.04

can you give us a face sheet of the presentation before the San Francisco Planning Commission and what the vote was?

MR. EVANS: The Planning Commission just like your Commission is not making a vote at all, is just hearing public comments.

We received two public comments and then

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also comments from at least two or three of the Commissioners.

The focus of those comments were primarily regarding the transportation issues and the need, in particular to look at the regional transportation challenges and Geneva Avenue extension was mentioned numerous times as a key link to the transportation network focus area and that proposal was extending existing Geneva Avenue which currently terminates at Bayshore Boulevard and connected to Highway 101 for a more direct access to the freeway.

That roadway project would also continue to have an improved interchange that would interact with Army Way which is right in front of the Executive Park development and then lead into Candlestick.

And so it is a pretty major transportation improvement that is being considered for basically

all the projects in the southeast with potential going to deal with all the passive impacts of all of the development area.

PRESIDENT COVINGTON: Thank you.

I would like to thank staff for the presentation and, Madam secretary, can you please call the next item?

(Concluded at 5:00 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 were taken by 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

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correct transcript of the hearing proceedings.

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: TUESDAY, JULY 1, 2008.

Easteller Bruihl, RPR, CSR No. 3077

San Francisco Redevelopment Commission Meeting and Public Hearing; July 1, 2008

RC 1.01 (Morine) General--EIR is a very thorough document; includes pretty much everything we need to know to make our decision as a community.

Response: Comment is noted; no further response is necessary.

RC 1.02 (Morine) Transportation and Circulation--need to clarify transportation impacts and mitigations--EIR indicates that traffic will be basically almost gridlock at certain hours of the day--there are several pages on mitigation and several mitigation pieces, but no maps of how mitigations are going to be addressed exactly--maybe maps of proposed new intersections and interchanges would help.

Response: A map of the anticipated roadway network improvements in 2025 is illustrated in Figure 8.4 of the Draft EIR (DEIR page 8-46).

RC 1.03 (Morine) Public Services--library--"minor issue"--EIR indicates that Visitacion Valley is going to get a new library; this was part of planning process before this redevelopment plan formulation program commenced; population-based library size determined before this EIR document was completed; EIR projection of 6,000 people for the neighborhood is "just a little bit inconsistent with what we had planned for our library--could staff look at and "clarify it down the road?"

Response: The new Visitacion Valley Branch library is currently in the design stage and is scheduled to open in 2010. The design program for the new library has been dictated by a number of factors, including the San Francisco Library Commission established budget for the Visitacion Valley branch library project, as well as projected new housing units and commercial development in Project Area Zone 1. Most San Francisco Public Library system branch libraries are 6,000 to 8,000 square feet, regardless of variations in branch library service area housing and population totals (Visitacion Valley Branch Library Proposition 14 Application Form, May 30, 2002, page 7).

RC 2.01 (Jackson) Transportation and Circulation--cumulative development impacts--comprehensive planning approach needed--concern regarding fact that there are a lot of plans being made in the area: Bayview-Hunters' Point, South Bayshore Plan, Visitacion Valley, Brisbane, etc., that raise concerns about traffic matters; specific concern regarding traffic from Bayshore through Bayview-Hunters' Point (3rd Street).

Response: Given the location of the project south of the U.S. 101 interchange at Bayshore Boulevard/Third Street, only a small portion of project-generated trips are expected to use Third Street north of the interchange. Most inter- and intraregional through trips would make use of U.S. 101, which offers more convenient access to downtown San Francisco and other important regional points. In addition, trips traveling between the Project, Executive Park and the Bayview Waterfront Project (Candlestick, Hunters Point Shipyard and India Basin) could be served from Harney Way

and Hunters Point Expressway and the new access roadways to be provided as part of those developments.

RC 2.02 (Jackson) Hazards and Hazardous Materials--clean-up--will Universal Paragon or who will be responsible for clean-up of the area; City does not have the money

Response: The description of status of remediation in DEIR section 11.1.2, Historical Uses and Ongoing and Future Remediation Activities in Redevelopment Zone 1, on page 11-1 through 11-11 of the DEIR Hazards and Hazardous Materials chapter is adequate under CEQA in that it accurately represents the existing setting at the time the environmental analysis commenced (pursuant to CEQA Guidelines section 15125(a)). In response to this and similar comments regarding the ongoing status of the Zone 1 remediation program, Appendix 5.4 of this Final EIR, Remediation Status Update for Redevelopment Zone 1, includes the latest documentation (as of October 15, 2008) on the remediation program for the Redevelopment Zone 1 properties. Appendix 5.4 includes two components: (1) a September 2008 "Summary of Environmental Conditions and Planned Remediation of the Former Schlage Lock and Universal Paragon Corporation (UPC) Properties" prepared for the San Francisco Redevelopment Agency by Brownfield Partners, LLC; and (2) a September 8, 2008 memorandum to the San Francisco Redevelopment Agency from the Universal Paragon Corporation (UPC) describing the results of a legal settlement between UPC and the Ingersoll Rand Company regarding responsibility for remaining remediation needs.

In summary, the two documents: (1) explain that a May 28, 2008 legal settlement has transferred ownership of the 12-acre former Schlage property from Ingersoll Rand to UPC and transferred remediation and environmental liability for the project to Brownfield Partners, remediation/technical contractors, who will undertake the regulatory administration and insurance negotiation process obligation for the remediation effort; and (2) outline the Brownfield Partners-planned remaining remediation activities for the UPC property and an adjacent portion of the former Southern Pacific (SP) Brisbane Rail Yard property, including the latest proposed remediation schedule, proposed remediation approach. The description indicates that the remediation approach includes demolition of the existing buildings, evaluation of the effectiveness of the existing soil vapor extraction and treatment system, further characterization of key areas of the site, preparation and submittal of a remediation Feasibility Study, Combined Remediation Action Plan (RAP) and other remediation documents for DTSC approval; obtaining approval for and implementing the soil and groundwater remediation approach, and performing operation, maintenance and monitoring (O&M) activities as necessary following implementation of active remediation. Presumedly, if the DTSC ultimately requires a land use covenant similar to what is suggested in this comment, the approved remediation program would provide for such a covenant.

RC 3.01 (da Costa) General--need for adequate community input--area being considered is the City's "last frontier' Draft EIR is the right time to involve the community in a meaningful discussion; can give the consultants or people who prepare the

EIR all the money they need to create a thick document, but if you do not get needed input from the community, the Commission has failed.

Response: The Planning Department and Redevelopment Agency have provided and will continue to provide substantial opportunity for the public to participate and comment during the Visitacion Valley Redevelopment Plan adoption process. As noted on DEIR pages 1-6 through 1-8, since early 2000, the Board of Supervisors and Planning Department have been conducting a major community-based planning effort to re-examine land use controls and consider other means of revitalizing the City's eastern neighborhoods.

Community Workshops. Residents, business and property owners, and other stakeholders in five eastern neighborhood districts where housing and industry co-mingle--Mission, South of Market, Showplace Square-Potrero-Central Waterfront, South Bayshore, and Visitacion Valley--have been taking part in an extensive series of Planning Department-conducted *community workshops* to determine the future character of their neighborhoods.

In 2002, within the context of its eastern neighborhoods planning effort, the Board of Supervisors directed the Planning Department to engage in a community-based planning process to formulate a vision for the future re-use of the vacant Schlage Lock property and other adjacent underutilized industrial lands in Visitacion Valley. In the Spring of 2002, after an intensive series of community workshops, the Planning Department released the *Visitacion Valley Schlage Lock Strategic Concept Plan* (the "Concept Plan").[1]

In 2004, the Mayor's Office of Workforce and Economic Development, in cooperation with local organizations and interest groups including Urban Solutions, the Bay Area Local Initiatives Support Corporation and Asian Neighborhood Design, and various neighborhood-based groups, conducted an additional series of four community workshops to discuss and "establish an identify and vision for the commercial district."[2] The workshops were held in the summer and fall of 2004, were attended by approximately 30 to 50 people, including local merchants, residents, community advocates and City officials,[3] and resulted in documentation[4] of a series of specific recommendations for enhancing the Leland Avenue and Bayshore Boulevard business corridor and promoting corridor business.

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[1]EDAW, *Visitacion Valley/Schlage Lock Community Planning Workshop--Strategic Concept Plan and Workshop Summary*, prepared for the San Francisco Planning Department, July 2002.

[2]Urban Solutions, Local Initiatives Support Corporation, Asian Neighborhood Design, *Leland/Bayshore Commercial Revitalization*, 2005.

[3]Ibid.

[4]Ibid.

Following three more community workshops conducted between October 2005 and February 2006, the Planning Department and local community formulated a *Leland Avenue Street Design Project.*

Between August 2006 and August 2007, an additional series of community workshops was conducted for the Schlage site to finalize the vision for the property and to establish permanent controls for its redevelopment. Based on this community workshop input, the Planning Department in January 2008 released a draft set of development controls and design guidelines for the Project Area, entitled *Draft Visitacion Valley/Schlage Lock Design for Development* ("Design for Development").

Additional community workshops have been conducted by the Planning Department between August 2007 and now to refine and implement the Design for Development.

Public Participation in EIR Preparation. The Visitacion Valley Redevelopment Program EIR has been prepared following the normal CEQA-based public consultation process conducted for all San Francisco EIR preparation programs.

Scoping Meeting. Pursuant to CEQA Guidelines section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the Redevelopment Agency conducted a public scoping meeting on February 26, 2007 at 10:00 AM, at One South Van Ness Avenue, Fifth Floor, Room 5080, where the views of adjacent jurisdictions, responsible agencies, and interested members of the public requesting notice, as to the appropriate scope and content of the EIR were solicited. Neighborhood representatives attended this scoping meeting and commented on the EIR scope and content.

Notice of Preparation. A Notice of Preparation (NOP) of a Draft EIR and companion Initial Study Checklist, dated January 31, 2007, were issued to interested and responsible agencies for a state-mandated 30-day review period (see EIR appendix 20.1).

As provided for in the CEQA Guidelines, the scope of the EIR has included all environmental issues to be resolved that are currently known to the Co-Lead Agencies (the Redevelopment Agency and Planning Department), including those issues and concerns identified as possibly significant at the February 26, 2007 scoping session, and by other interested agencies and individuals in response to the Notice of Preparation (NOP), and by interested parties who attended to February 26, 2007 EIR scoping meeting.

DEIR Public Hearings. Fully noticed public hearings on the Draft EIR have been conducted by the San Francisco Planning Commission on June 26, 2008 and by the San Francisco Redevelopment Agency on July 1, 2008.

Project Area Committee (PAC) Not Required. Section 33385 of the CRL requires the legislative body to form a Project Area Committee (PAC) for a proposed redevelopment plan or plan amendment if a substantial number of

low-income persons or moderate-income persons, or both, reside within the project area, and the proposed redevelopment plan will contain authority for the Agency to exercise eminent domain over property on which any persons reside, or contains one or more public projects that will displace a substantial number of low-income persons or moderate-income persons, or both.

The Redevelopment Commission approved Resolution 129-2006 on September 19, 2006 stating that the Visitacion Valley Project Area does not require a PAC because the proposed Redevelopment Plan contains no proposals to exercise eminent domain over properties on which persons reside and does not include a public project that will displace residents.

Citizens Advisory Committee. Although establishment of a PAC was not required, in May 2006 the Mayor of San Francisco established an 18-member Visitacion Valley Citizens Advisory Committee (CAC) to advise the Redevelopment Agency and the City in their consideration of a Redevelopment Plan for the Project Area. The Visitacion Valley CAC includes residential property owners, business owners and community activities. The original CAC membership has undergone a number of changes since May 2006, as indicated by the listing of CAC membership on the revised version of DEIR chapter 19 in section 4, Revisions to the Draft EIR, herein.

The responsibilities of the CAC include reviewing policy documents and evaluating the need for and potential effectiveness of the Redevelopment Program. Since May 2006, the CAC has met monthly to review and discuss the Agency's progress, receive information from consultants and provide guidance throughout the process.

The Agency has received and will continue to receive public input regarding the proposed Redevelopment Plan through active involvement of the CAC and the public hearings described in this response.

To date, the CAC has reviewed and provided input on documents including the Existing Conditions Report, the Preliminary Report, drafts of the Redevelopment Plan, drafts of the Design for Development document, the Five Year Implementation Plan, tax increment projections, and the Draft Environmental Impact Report.

Section 33385.5 of the CRL requires the Agency to submit to the PAC copies of the Redevelopment Plan at least thirty days prior to the hearing by the legislative body. This requirement does not apply to the Visitacion Valley Project Area, as it is not required to have a PAC. However, the Agency did submit the Redevelopment Plan to the CAC thirty days prior to the hearing of the Redevelopment Commission. In March 2007, the CAC voted unanimously to endorse the goals and objectives of the Redevelopment Program. On October 14, 2008, the CAC recommended approval of the Redevelopment Plan.

Future Public Hearings. In addition to the public participation provided through the CAC, the Agency Commission and the Board of Supervisors will continue to consult and obtain the advice of property owners and occupants on the adoption of the Redevelopment Plan at their respective public hearings on the Redevelopment Plan. Per CRL Section 33349, the Agency will send a first class mailing containing the required notice of its public hearings to the last known assessee (the "property owner") of each parcel of land and to all tenants and business owners (occupants) within the Project Area. This notice will explain the purpose of the public hearing and contain other pertinent information such as the meeting dates, times and locations. The hearings of the Board of Supervisors are anticipated in early 2009.

Mailing List. The Planning Department and the Agency also maintain a 1,100 plus address mailing list used to notice every CAC meeting and planning workshop. This list includes all property owners in the Project Area. This mailing list is updated monthly with attendees at all meetings and new contact information collected at community events such as street fairs, community meetings and town hall meetings. The EIR notice was sent to this list as well as all addresses of property owners within a 300 foot radius of the Project Area Boundary. City staff will also use the 94134 zip code as a potential additional outreach mailing for future workshops and public hearings.

Please also see response to comment RC 9.01 which follows.

RC 3.02
(da Costa)

Population and Housing--cumulative impacts of anticipated southeast area development--Draft EIR is missing general data, empirical data linked to the Housing Element; missing is a thorough analysis of cumulative population in the Schlage Lock area--impacted not only by Schlage Lock development activities but also by the operations of Santa Fe, which is not very far from here.

Response: The Draft EIR includes chapter 6, Population and Housing, that addresses the anticipated impacts of the proposed redevelopment program on population and housing characteristics in the Project Area and greater San Francisco (especially DEIR pages 6-13 through 6-17). The scope of the EIR, including the Population and Housing chapter, has been dictated by CEQA and the CEQA Guidelines. Under CEQA, project issues related to population and housing are not considered impacts on the environment unless they result in adverse physical environmental effects.[1] The physical changes needed in the San Francisco southeast area vicinity to accommodate project and project-plus-cumulative growth and their potential environmental impacts are fully addressed throughout the DEIR under such environmental topic headings as transportation and circulation (chapter 8, and see response to comment LR 11.10), air quality (chapter 9), noise

[1]CEQA Guidelines section 15064(e) notes that an economic or social change by itself would not be considered a significant effect on the environment. The population changes that would occur with implementation of the Project, and the effect of those changes in contributing to cumulative population growth in the San Francisco southeast area and vicinity, are not adverse environmental (physical) impacts in themselves.

(chapter 13), public services (chapter 14) and utilities and service systems (chapter 15).

Additional, more detailed information on Project Area housing and demographic data is included in the Report to the Board on Visitacion Valley Redevelopment Plan Adoption prepared for the Agency by Seifel Consulting and available for review at the offices of the San Francisco Redevelopment Agency, 1 South Van Ness Avenue, Fifth Floor, San Francisco, CA 94103; contact: Tom Evans, phone: 415-749-2539.

RC 3.03 (da Costa)

Hazards and Hazardous Materials--cumulative health and safety impacts--operations of Santa Fe not very far; you have petroleum tanks; we need to find out if we build thousands and thousands of homes, what will be the cumulative impact on the people that live here.

Response: DEIR chapter 11, Hazards and Hazardous Materials, provides a detailed description of known and potential hazards and hazardous materials conditions in the Project Area, related potentially significant adverse public health impacts anticipated as a result of the proposed project, and associated requirements for minimizing impacts. Consistent with CEQA, the chapter specifically addresses whether the project or its associated growth effects in redevelopment zones 1 and 2 would directly or indirectly (from CEQA Guidelines Appendix G, items VII (a-3)):

(1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

(2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

(3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

(4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment; or

(5) Impact implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

With regard to the operations of Santa Fe cited in this comment, the concern is apparently in reference to the multi-track Caltrain/Union Pacific rail corridor that traverses the eastern edge of the Project Area. The vast majority of train passages along this corridor are Caltrain passenger trains. Nevertheless, potential hazards from spills of toxic and/or hazardous materials exist along this route. No UPRR program is in place to disseminate information regarding the frequency of hazardous cargos and the specific hazardous materials transported on this route. It therefore must be assumed that the UPRR may transport any chemical or other hazardous material product

allowed by the U.S. Environmental Protection Agency, U.S. Department of Transportation (DOT) and State Department of Transportation (Caltrans) on this route. Transporters of hazardous materials, including the UPRR, are subject to the regulations imposed by these federal and state which have been established to minimize the risk due to accidental spill or release. The DOT regulates the transport of chemicals and hazardous materials by rail between states. Caltrans is the primary state agency charged with regulating and enforcing state and federal regulations pertaining to hazardous materials transport in California. These two agencies regulate railroad container types and design requirements.

Clean-up of hazardous materials spills is typically the responsibility of local emergency response agencies. The San Francisco Fire Department includes over 60 specially trained Hazardous Materials Specialists and a Hazardous Materials Response Unit that is outfitted with equipment for hazardous materials identification, assessment, protection, control and containment, and decontamination.[1]

Because UPRR compliance with existing state and federal regulations for transport of hazardous materials would minimize the risk of accidental release from rail transport operations, no significant adverse impact related to the transport of hazardous materials and wastes has been identified, and no additional mitigation has been required.

With regard to the nearby petroleum tanks cited in this comment, it is assumed that the reference is to an existing Brisbane Terminal ("tank farm") facility located at 950 Tunnel Road in Brisbane, approximately 5,550 feet (a little more than one mile) from the southern boundary of Visitacion Valley Redevelopment Area Zone 1, just west of U.S. 101. The Brisbane Terminal site is outside the approximately 500-foot radius ("buffer zone") of the Project Area within which a summary listing of all known (recorded) and regulated hazardous materials storage or handling sites is provided in DEIR Table 11.1; i.e., is not considered to be near the Project Area. In response to this comment, the following information on this facility has been collected from a California Regional Water Quality Control Board (CRWQCB) on the facility (CRWQCB, Cleanup Activity Fact Sheet: SFPP, L.P., Brisbane Terminal, 950 Tunnel Avenue, Brisbane; October, 2007):

The facility is located in a light-industrial area of Brisbane and is bordered by Tunnel Avenue to the east and south, Union Pacific Railroad tracks to the west, and the Brisbane Landfill to the north.

The facility is a bulk petroleum storage and distribution terminal that provides aviation fuel to San Francisco airport as well as gasoline and diesel fuel to various retail stations. The facility was constructed in the 1960s and is currently owned and operated by SFPP, L.P.

[1]San Francisco Fire Department; *Fire Facts;* www.sfgov.org/site/fire, accessed May 25, 2007.

The eastern portion of the facility is located upon the former Brisbane Municipal Landfill while the western portion, where 21 aboveground storage tanks (ASTs) reside, is situated on a bedrock outcrop. Gasoline, diesel, and aviation fuels are brought to the facility via pipeline and are stored in the ASTs. The gasoline and diesel fuel stored in the ASTs is pumped into tanker trucks via five loading racks at the facility for distribution to Bay Area gasoline stations. Aviation fuel is piped directly from the facility to San Francisco Airport.

Groundwater sampling is currently being conducted at the site twice per year. According to CRWQCB, cleanup activities conducted in response to historic spills have generally been successful in reducing petroleum fuel and fuel additive concentrations in the groundwater.

An extensive summary of previous investigations and cleanup activities is available in a remedial action plan (RAP), dated June 29, 2007, and a Monitored Natural Attenuation (MNA) report dated December 15, 2006. Both reports are available at the Brisbane Library and online (see website below).

A screening-level risk assessment presented in the RAP found that current facility conditions are protective of human health and the environment. Groundwater monitoring data indicate that natural processes are reducing the concentrations of petroleum fuel and fuel additives in soil and groundwater beneath the facility. Therefore, the RAP proposes a MNA as the site-wide cleanup strategy. MNA relies on periodic sampling of effected media to demonstrate continued cleanup progress. The 2006 MNA report and the 2007 RAP report provide the lines of evidence to support this proposed approach.

Based on this CRWQCB-provided information, it has been determined that the Brisbane "tank farm" facility and associated transport activities do not represent a significant health and safety hazard for the proposed Project.

RC 3.04 (da Costa)

Land Use--compatibility of homes with rail yard and rail tracks--if we build homes next to a rail yard and next to trains passing, we need to address that.

Response: The EIR authors agree that the issue of compatibility between Visitacion Valley Redevelopment Program-facilitated new housing development in Zone 1 and existing and future rail activity along the multi-track Caltrain/Union Pacific railroad system that traverses the eastern edge of the Project Area is an important environmental concern. The potential for noise and groundborne vibration impacts of projected future increases to rail movements along this system on planned residential development in Zone 1 is addressed in DEIR chapter 13, Noise. In particular, the issue is addressed on DEIR pages 13-4 (sections 13.1.3, Existing Noise Environment, and 13.1.4, Noise Monitoring Results), 13-5 (long-term measurement location results for location LT-1, and subsection (b), Existing Caltrain Noise), 13-7 (Figure 13-2, Hourly Trends in Noise Levels at Location LT-1), 13-10 (Table 13.3, Summary of Long-Term and Short-Term Noise Measurements), 13-21 (Impact and Mitigation 13-2 for project-facilitated groundborne vibration impacts) and 13-22 and 13-23 (Impact and Mitigation 13-2: potential

exposure of new, project-facilitated noise-sensitive developments to ambient noise levels exceeding standards).

RC 4.01 (Landry) General--Redevelopment Agency priorities--state of black community--diminished to its worst condition ever; we don't want to see the City go bankrupt like Vallejo; economic hardship visible everywhere; scientists are saying that it's not a matter of if, but when an earthquake will happen; disaster hanging over our heads; "so, let's not take this lightly."

Response: Please see response to comment RC 3.01 above.

RC 5.01 (Evans) General--need for adequate community input--inadequate community input.

Response: Please see response to comment RC 3.01 above.

RC 6.01 (Commissioner Swig) Transportation and Circulation--need to clarify transportation impacts and mitigations--traffic piece confusing and in need of clarification; makes it sound like Manhattan at its worst rush hour disaster; there should be more clarification; hard time envisioning the massive gridlock that is reflective in the EIR; needs to be some clarification on this.

Response: In response to this and similar comments regarding the need to provide a clear summary of the various DEIR-identified transportation network mitigation needs for the three analysis scenarios--Existing Plus Project, 2025 Cumulative Plus Project, and 2025 Cumulative Plus Project with Planned Regional Transportation Improvements, a summary chart entitled "Visitacion Valley Redevelopment Program--Roadway System Impacts and Mitigation Summary" has been formulated and included in Appendix 4.5 (Supplemental Transportation Analysis Information) herein. The chart lists each study intersection, freeway segment and freeway ramp addressed in the DEIR traffic analysis, and summarizes associated impact and mitigation findings for each of the three analysis scenarios.

With regard to the various roadway system operational impact findings, "massive gridlock" is not projected; rather, the analysis concludes that under the Existing Plus Project scenario without mitigation, peak hour operational ("level of service" or LOS) conditions--i.e., the average delay per vehicle--at five intersections along Bayshore Boulevard--Bayshore/Blanken, Bayshore/Arleta/San Bruno, Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnydale--could potentially be increased in the AM peak hour from current durations of between 12 and 31 seconds per intersection to durations greater than 50 to 80 seconds--i.e., increases in delay of greater than 40 to 65 seconds at each of these five intersections.

Peak-hour operational (LOS) conditions under the Existing Plus Project scenario in the PM peak hour without mitigation would also be reduced due to the Project, with the Project creating a potentially significant increase in peak hour delays at two intersections--Bayshore/Arleta/San Bruno and Bayshore/Leland, from current durations of between approximately 25 and 28 seconds to durations greater than 80 seconds--i.e., increases in delay of greater than 22 to 25 seconds at each of these two intersections.

Implementation of DEIR-recommended mitigations--individual development Transportation Management Plans (TMPs) and elimination of the Project-proposed left-turn lane from southbound Bayshore into Zone 1 at Leland (Mitigations 8-1B and 8-1C) would reduce the degree of added delay, but not to less than significant levels.

The analysis also concludes that under the 2025 Cumulative with Project and Planned Regional Transportation Improvements scenario, peak hour operational (LOS) conditions would be similarly reduced due to the Project. The Project would contribute "significantly" to cumulative increases in AM peak hour operational (LOS) conditions at four intersections, including three intersections along Bayshore--Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnyvale--and the Tunnel/Blanken intersection. Without mitigation, AM peak hour delays at these intersections with or without the Project could increase to greater than 80 seconds at Leland and Sunnydale and to between 44 and 75 seconds at the other two intersections (current AM peak hour delays at these four intersections range form 12 and 31 seconds).

The Project would contribute "significantly" to cumulative increases in PM peak hour operation (LOS) conditions at two intersections, both along Bayshore--Bayshore/Arleta/San Bruno and Bayshore/Leland. Without mitigation, PM peak hour delays at these two intersections with or without the Project could increase to between 68 and 74 seconds (current PM peak hour delays at these two intersections are between approximately 25 and 28 seconds).

With implementation of the DEIR-proposed mitigations (signal timing and other design modifications, including possible through- and turning-lane restriping), the Project contribution to these projected cumulative future AM and PM peak hour delays could be reduced to a less-than-significant level; however, because these intersection design changes could have adverse effects on Muni transit operations and truck movements along Bayshore and would impact bike routes and pedestrian movements, they will need to be further explored. In this light, the DEIR has described the Project contribution to these projected future peak hour intersection delays as significant and unavoidable.

RC 6.02 (Commissioner Swig)

Alternatives--does the EIR recommend Alternative 2 as the project (referring to Draft EIR page 2-62, section 2.5.2, Conclusions: Environmentally Superior Alternative)?

Response: The DEIR does not recommend adoption of Alternative 2: Reduced Housing Development in Redevelopment; rather the DEIR simply indicates for CEQA compliance purposes that Alternative 2 is the "environmentally superior" alternative, meaning that among the range of six alternatives identified and evaluated, Alternative 2 in the aggregate appears to have the lowest degree of adverse environmental effects.[1] Given this

[1]The CEQA Guidelines (section 15126.6) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

DEIR conclusion, the CEQA-required written "findings" to be prepared after the EIR is certified (pursuant to CEQA section 15091, Findings) will need to include a brief explanation of the lead agency's (the Planning Department and Redevelopment Agency's) rationale that specific economic, legal, social, technological or other considerations make this or any of the other identified project alternatives infeasible.

RC 6.03 (Commissioner Swig) Alternatives--would a ranking of the various alternatives be appropriate in an EIR? Would like to know which alternatives are ranked number 2, 3, 4, 5 and 6, in terms of environmental impact.

Response: As indicated, during the public hearing, by Agency staff (S. Muraoka) in response to this comment, a ranking of alternatives from least to most environmentally superior is not required under CEQA (Guidelines section 15162.6, Consideration and Discussion of Alternatives), and would require a highly subjective "weighing" of importance among the various environmental topics evaluated in the EIR. However, Tables 17.2 (Alternatives Comparison to Proposed Project: Summary Overview) and 17.7 (Trip Generation Comparison--Project vs. Project Alternatives) on DEIR pages 17-7 through 17-9 provide a topic-by-topic summary comparison.

RC 6.04 (Commissioner Swig) Alternatives--how can Commissioners readily determine which alternatives would have the worst environmental impacts and which would have the least?--how would staff suggest that all of the various environmental considerations involved in considering each alternative be filtered effectively? How do we know for example that, arbitrarily, say Alternative 3 is slightly worse than the project while Alternative 5 by comparison might be significantly worse? How would staff suggest that the Commissioners consider the alternatives and understand which alternatives would have the worst environmental impacts and which would have the least? Looking for a ranking or a way to understand the comparative impacts of the alternatives more thoroughly.

Response: Please see response to related comments RC 6.02 and RC 6.03 herein.

RC 7.01 (Commission Vice President Breed) General--community outreach urged--want to make sure in moving forward that there is more community outreach, that we send letters to the zip codes that will be vastly affected by this plan; and isn't there a CAC that has been working with the Agency on the Visitacion Valley project?

Response: Please see response to comment RC 3.01 above. As described in that response, more community outreach will be conducted by the Agency prior to Redevelopment Plan approval. Per CRL Section 33349, the Agency will send a first class mailing containing the required notice of its public hearings to the last known assessee (the "property owner") of each parcel of land and to all tenants and business owners (occupants) within the Project Area. This notice will explain the purpose of the public hearing and contain other pertinent information such as the meeting dates, times and locations. The hearings of the Board of Supervisors are anticipated in early 2009. As also described, there is a Mayor-appointed CAC that has been working with

the Agency on the Visitacion Valley project, and the Planning Department and Redevelopment Agency maintain a 1,100-plus mailing list used to notice every CAC meeting and planning workshop. City staff will also use of the 94134 zip code as a potential additional outreach mailing for future workshops and public hearings.

RC 7.02 (Commission Vice President Breed)

General--need for adequate community outreach--has Agency staff sent notices to all of the zip codes that will be affected by this particular project; and have the notices been in different languages?

Response: See response to PC 7.01 above.

RC 8.01 (Commission President Covington)

General--need for adequate community outreach--in moving forward, must make sure that we are doing our due diligence in communicating the project to the community through their churches, organizations or other existing entities, and not forcing the community to come forward at the CAC or Commission level; must do what we can do to community what project will mean for the community because things will change.

Response: Pursuant to this and similar strong Commission directives, and associated San Francisco legislation, the Agency has been conducting and will continue to conduct an extensive program of community outreach for the proposed Visitacion Valley redevelopment program, as described in detail above in response to comments RC 3.01 and RC 7.01, above.

RC 9.01 (Commissioner Cheu)

General--need for adequate community outreach--we should clarify for the public and our radio listeners that public review may continue through July 27th; if people have comments, they can either speak before commission or, alternatively, they can submit them in writing.

Response: In response to this and similar strong Commissioner directives and associated San Francisco legislation, the Agency has been conducting and will continue to conduct an extensive program of community outreach for this project, as explained in detail in response to comment RC 3.01 above. And as Commissioner Cheu suggests, if people have comments, they can either speak at the upcoming public hearings before the commission described in response to RC 3.01 or, alternatively, can submit comments to the Commission or Agency staff by telephone or in writing:

3.	**Contact Person and**	Tom Evans, Lead Planner
	Phone Numbers:	San Francisco Redevelopment Agency Telephone: (415) 749-2539 FAX: (415) 749-2524
	E-Mail:	Tom.Evans@sfgov.org
	Street Address:	1 South Van Ness Avenue, Fifth Floor
	City/State/Zip:	San Francisco, California 94103

RC 10.01 (Commission

Organizations and Person Contacted--need to add CAC membership list in this section (Draft EIR page 19-1); also a couple of names listed under City

President Covington) and County of San Francisco have changed; have their successors been included in the process?

Response: The requested revisions to DEIR page 19-1 have been made in response to this comment. Please see the revised version of DEIR page 19-1 in section 3, Revisions to the Draft EIR, herein.

RC 10.02 (Commission President Covington) Visual Factors--visual simulations--are all depictions worst case scenarios?

Response: Yes, the simulations are intended to depict the maximum building envelopes permitted by the proposed Design for Development development controls and design guidelines. As stated on DEIR page 7-9:

"The simulations indicate the location, scale, and massing of possible Project Area buildings based on the urban design framework, building form recommendations and DCDG's described in the Design for Development. The simulations have been prepared using objective computer modeling techniques. The images are accurate within the constraints of available site and Design for Development information. The level of architectural detail that is depicted is minimal, however, and is not intended to reflect the specific architectural forms, materials, or detailing of future, as yet undesigned, individual development projects facilitated by the proposed Redevelopment Plan and Design for Development."

RC 10.03 (Commission President Covington) Alternatives--clarifications requested--what is meant by "reduced housing" alternative.

Response: The term "reduced housing alternative" is used in the DEIR in reference to DEIR-identified Alternative 2, Reduced Housing Development in Redevelopment Zone 1." Primarily as a means of reducing peak-period vehicular trip generation, this alternative would include a total of only 735 net new residential units in the Project Area as compared to a total of 1,585 net new residential units in the Project Area for the proposed Project. The result would be approximately 853 net fewer residential units in the Project Area. All other proposed development under the redevelopment program would remain the same for this Alternative 2 as for the proposed Project, which provides for up to 1,585 total residential units. See Table 17.1 on DEIR page 17-6 for a comparison of potential net new residential units between the "Reduced Housing" alternative (Alternative 2) and the proposed Project.

RC 10.04 (Commission President Covington) General--can we receive fact sheet of presentation before Planning Commission and what Planning Commission vote was?

Response: Two members of the public commented, and three members of the Planning Commission commented on the item at the June 26, 2008 Planning Commission public hearing. The comments made and the responses to the EIR authors to those comments are presented in this FEIR Response to Comments document under comment codes PC 1.01 through PC 6.01.

APPENDIX 4.3

RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR

The following appendices section includes a reiteration of those comments from section 3.2 (Responses to Comments Grouped by Topic) of this Final EIR document that were submitted in writing during and immediately after the Draft EIR public review period, and a reiteration of the associated responses of the EIR authors from section 3.2. This section includes copies of the twelve (12) letters, memoranda and e-mails received during the 45-day public review period with comments pertaining to CEQA or the EIR. Each letter, memorandum or email herein includes an assigned letter-number code (e.g., LR 1.01, LR 1.02, LR 1.03, LR 2.01, LR 2.02, etc.) posted in the right margin next to each comment pertaining to CEQA or the EIR. Each coded letter is then followed by the EIR authors' summary of each comment and the EIR authors' written response to each comment. Where warranted, some responses include reference to revisions to the Draft EIR which have been made in response to the comment and included in section 4 (Revisions to the Draft EIR) of this Final EIR document.

LR 1

"Karen Toth"
<KToth@dtsc.ca.gov>
07/08/2008 11:43 AM

To "Tom Evans" <Tom.Evans@SFGOV.ORG>
cc <mhashem@brownfieldpartners.net>, "Laura Kaweski" <LKaweski@dtsc.ca.gov>, "Virginia Lasky" <VLasky@dtsc.ca.gov>, <stevenh@sfbayleasing.com>
bcc
Subject Draft EIR Comments

History: This message has been replied to and forwarded.

Tom

Attached are our comments on the Draft EIR which is out for public comment. Do you need a formal letter for the file, or is electronic sufficient?

Karen

DTSC draft revised EIR comments clean.doc

LR 1

DTSC's Comments on the DEIR for Visitacion Valley Redevelopment Program:

1. Cultural:

1.1. DTSC reviewed the DEIR Cultural Resources section and found most of this section to be adequate. However, prior to proceeding with the in-depth historical and archaeological research described in Mitigation Measures 10-2 through 10-4, the project proponent should request a Sacred Land File Search from the Native American Heritage Commission (NAHC). The DEIR should include mitigations that require the project proponent to furnish project information to the list of tribal contacts supplied by the NAHC and other individuals or groups with interest in the project and invite them to participate in the California Environmental Quality Act (CEQA) process. Interested parties may express interest in participating in archaeological field studies, for example, as monitors or consultants during subsurface site project activities. Interested parties may also wish to participate in the development of a specific archaeological discovery plan to facilitate timely, legal, and culturally-appropriate action in the event that human remains and/or potentially-significant Native American archaeological resources are unexpectedly encountered during earth disturbing activities. **LR 1.01**

1.2. It is also suggested that the DEIR state the timing of the survey, analysis, and data recovery activities that the DEIR lists as mitigations in a Mitigation Monitoring and Reporting Plan developed after the public review period and incorporated by reference in the Final EIR. The lead agencies need to complete non-intrusive historic and archaeological surveys and be prepared to mobilize appropriate specialists well in advance of commencing intrusive building removal and remediation activities. **LR 1.02**

2. Hazards and Hazardous Materials:

2.1. DEIR page 11-6 (c) states that DTSC has not yet received a revised Draft Remedial Action Plan (RAP). OPEA suggests that a brief status statement be included to state that a pilot study for the groundwater in the DTSC project area is underway and that the Draft RAP can not be finalized until those results are available. Including this information will inform the reader as to why the RAP has not yet been finalized. **LR 1.03**

2.3. The following wording is recommended in the Hazard and Hazardous Materials section of the DEIR: **LR 1.04**

Page 11-9 (e), last par. The Remediation Planning should be elaborated to include the following: "Remediation planning will include the following plans and measures: utility clearance, security measures, waste management, a Health and Safety Plan, Soil Sampling Plan, treatment and excavation plans, dust control plan, air monitoring plan and Transportation Plan. These plans and measures would be in-place and undertaken to prevent the creation of significant hazard to the public and the environment. The

Health and Safety Plan and Transportation Plan include contingency/emergency information, in case of a foreseeable upset and accident."

2.4. On p 11-11, (h), DTSC recommends that the DEIR include the following statement: "If hazardous materials/wastes would be handled within a quarter mile of any existing or proposed school, notification to the schools will occur in accordance with Title 14, California Code of Regulations, Section 15186." . **LR 1.05**

2.5. On *p 11-27, 2nd to the last par, last sentence. Delete last sentence, "As described earlier, DTSC will require a RAP describing clean-up procedures in these circumstances.)* **LR 1.06**

2.6. DTSC recommends that the DEIR include possible truck routes for transporting contaminated soils for Zones 1 and 2 trucks within the discussion on pages 11-27 through 11-28. **LR 1.07**

3. Hydrological/Ground Water: **LR 1.08**

Section 11.2.6(d) Please insert the following at the end of the section, "*and, Storm Water Pollution Prevention Plan (SWPPP).*"

4. Land Use and Planning: **LR 1.09**

DTSC suggests that the DEIR include a discussion of possible land use covenants that may be applied to a contaminated property in the event cleanup to residential standards is not possible or remediation activity results in the need for continued operations and maintenance and controls. This would include determinations by the DTSC that specific land uses are prohibited and that land disturbance cannot occur without prior notification to the DTSC.

5. Transportation: **LR 1.10**

DTSC recommends that a traffic pattern analysis be considered to determine if traffic conditions during remediation activities could result in a potential impact (DEIR 8-39, 8.3.1).

The following comments are informational. DTSC feels that they would strengthen the document, but they are outside our area of responsibility.

6. Utilities and Service Systems: **LR 1.11**

6.1. DTSC has several comments related to the overall redevelopment project. Has the San Francisco Public Utilities Commission (SFPUC) demonstrated that the current conservation practices reduce water demand by increments that are consistent with the projections stated on page 15-4? Is there a supporting document for this statement?

6.2. An explanation of how the SFPUC letter provides assurance from the water supplier that there is sufficient water supply for the project is needed (page 15-7). **LR 1.12**

6.3. On page 15-8, it is stated that the sewer system is designed to carry both wastewater and storm water runoff and has more than enough capacity. However, the combined wastewater/storm water system is still overwhelmed, resulting in up to 10 inadequately treated discharge events per year. It appears that this statement implies that the project will only contribute wastewater while retaining/reusing storm water and that there is enough capacity for wastewater only. This conclusion does not appear to be well-supported. **LR 1.13**

6.4. On page 15-12, the Impacts and Mitigation Measures section only discusses dry weather flows and wastewater; however, the CEQA thresholds of significance in the Utilities section asks whether new (or expansion of existing) storm water drainage facilities may be necessary, and the question is not answered here. There should be verification in the DEIR that the wastewater system has adequate capacity (Refer to the Initial Study prepared for DEIR scoping process). **LR 1.14**

LR 1.01 (DTSC) Cultural and Historic Resources--mitigation--participation in mitigation activities by Native American Heritage Commission (NAHC) and other interested parties--prior to proceeding with Mitigations 10-2 through 10-4, project proponent should request Sacred Land File Search from the NAHC. DEIR should include mitigations that require project proponent to furnish project information to list of tribal contact supplied by NAHC and other individuals or groups with interest in project and invite them to participate in CEQA process. Interested parties may express interest in participating in archaeological field studies, for example, as monitors or consultants during subsurface activities. Interested parties may also wish to participate in development of specific archaeological discovery plan to facilitate timely, legal and culturally-appropriate action in the event that human remains and/or potentially significant Native American resources are unexpectedly encountered during earth disturbing activities.

Response: Standard City procedure requires archaeological consultant to request a Sacred Land File Search and the most recent roster of Native American contacts for San Francisco from the Native American Heritage Commission (NAHC) in commencing preparation of any City-required archaeological document. Initial contacts by letter to designated Native Americans are followed-up by at least two phone contacts. Mitigation Measures 10-2, 10-3 and, by implication, 10-3 require solicitation of the participation of a Native American Most Likely Descendant (MLD) in the event of the discovery of Native American Human remains, as also required by State Law (Public Resources Code Sect. 5097.98), and all reasonable efforts to be undertaken to develop an agreed-upon plan for the treatment of human remains and associated or unassociated burial objects.

LR 1.02 (DTSC) Cultural and Historic Resources--mitigation--timing should be stated--Mitigation Monitoring and Reporting plan--DEIR should state that timing of DEIR-listed mitigations, i.e., required survey, analysis and data recovery activities, will be developed after public review period in a Mitigation Monitoring and Reporting Plan and incorporated by reference in the Final EIR. The lead agencies need to complete non-intrusive historic and archaeological surveys and be prepared to mobilize appropriate specialists well in advance of commencing intrusive building removal and remedial activities.

Response: Comment acknowledged. See response to comment LR 1.01 above. The Mitigation Monitoring and Reporting Plan indicates the sequence in which the archaeological mitigation measures are to be implemented. In accordance with Mitigation Measures 10-2, 10-3, and 10-4 no project soils disturbing activities, such as demolition, excavation, hazardous waste remediation or archaeological field investigations are to occur prior to the preparation of the required archaeological document, including an archaeological testing plan and archaeological monitoring plan.

LR 1.03 (DTSC) Hazards and Hazardous Materials--draft Remedial Action Plan (RAP) cannot be finalized until results are available from pilot study now underway for the groundwater in the DTSC project area--DEIR page 11-6, parag. 2, states that

DTSC has not yet received a revised Draft RAP. OPEA suggests that a brief status statement be included to state that a pilot study for the groundwater in the DTSC project area is underway and that the Draft RAP cannot be finalized until those results are available; including this information here will inform reader as to why the RAP has not yet been finalized.

Response: The DTSC-recommended brief sentence regarding the pilot study for groundwater has been added to DEIR page 11-6, paragraph 2, which now states: *A pilot study for the groundwater in the DTSC project area is underway. The Draft RAP cannot be finalized until those results are available.* This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.04 (DTSC) Hazards and Hazardous Materials--anticipated future soil and groundwater remediation activities--additional wording recommended for page 11-9, section (e), as last paragraph--pertaining to Remediation Planning and the Health and Safety Plan and Transportation Plan (what they will include, etc.).

Response: The DTSC-recommended additional wording pertaining to Remediation Planning has been added to DEIR page 11-9, section (e), as the last paragraph, which now reads: *Remediation planning will include the following plans and measures: utility clearance, security measures, waste management, a Health and Safety Plan, a Soil Sampling Plan, treatment and excavation plans, a dust control plan, an air monitoring plan and a Transportation Plan. These plans and measures would be in-place and undertaken to prevent the creation of significant hazards to the public and the environment. The Health and Safety Plan and Transportation Plan will include contingency/emergency information, in case of a foreseeable upset and accident. Preparation of the Health and Safety Plan component will serve to protect workers during all remediation and construction activities. Following DTSC approval of the RAP, remediation and removal work would be conducted in accordance with applicable OSHA worker safety regulations. The handling, transport, and storage of any hazardous waste or potentially hazardous waste would be conducted in accordance with applicable laws and regulations.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document. Please also see response to comment LR 1.09 in section 2.2.3 (Land Use) herein.

LR 1.05 (DTSC) Hazards and Hazardous Materials--sensitive nearby land uses--additional wording recommended for insert on DEIR page 11-11, section (h), regarding notification requirements if hazardous materials/wastes are to be handled within one quarter mile of any existing or proposed school.

Response: The DTSC-recommended additional wording pertaining to notification requirements has been added to DEIR page 11-11, as section (h), which now reads: *(h) Sensitive Nearby Land Uses. Numerous preschools, elementary and middle schools, childcare centers, and senior centers are located within one mile of Redevelopment Zone 1. If hazardous materials/waste would be handled within a quarter mile of any existing or*

proposed school, notification to the schools would be required to occur in accordance with Title 14, California Code of Regulations, Section 15168.

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.06 (DTSC) Hazards and Hazardous Materials--potential impacts due to accidental releases--wording deletion recommended for DEIR page 11-27, second to last paragraph: delete last sentence.

Response: The DTSC-recommended deletion of the last sentence in the second to the last paragraph on DEIR page 11-27 has been done; the paragraph now reads: ***Potential Impacts Due to Accidental Release of Hazardous Materials or Wastes During Normal Transport Operations--Entire Project Area.*** *The proposed Project could result in the use and disposal of hazardous materials in the Project Area, which in turn could increase the potential for transportation-related accidents along the routes where these hazardous materials are transported. Transport routes would include internal new roads in Zone 1, Bayshore Boulevard, and U.S. 101 via the Bayshore Boulevard, Harney Avenue and Beatty Avenue/Alana Way interchanges. Transporters of hazardous materials and wastes are subject to local, state, and federal regulations, which would minimize the risk; however, the potential would always remain for an accidental release of hazardous materials or wastes, which could then result in a potential impact on public health or the environment.*

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.07 (DTSC) Hazards and Hazardous Materials--potential impacts due to accidental releases--DEIR pages 11-27/11-28--DEIR should include possible truck routes for transporting contaminated soils for Zones 1 and 2 trucks within the discussion on pages 11-27 through 11-28.

Response: A description of possible truck routes for transporting contaminated soils for Zones 1 and 2 has been added to the cited paragraph on DEIR page 11-27. The revised version of this DEIR paragraph is shown in italics in the response to comment LR 1.06 above.

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.08 (DTSC) Hazards and Hazardous Materials--hydrology and water quality--DEIR page 11-20, section 11.2.6(d): wording recommended for insertion at end of this section.

Response: The wording recommended by DTSC has been inserted at the end of section 11.2.6(d) on DEIR page 11-20, which now reads: *The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits and associated Storm Water Pollution Prevent Plan*

(SWPPP) requirements and regulates leaking underground storage tanks and other sources of groundwater contamination.

This revision is included in section 3, Revisions to the Draft EIR, of this Final EIR document.

LR 1.09 (DTSC) Land Use and Planning--contaminated property--DTSC suggests that DEIR include discussion of possible land use covenant that may be applied to a contaminated property in the event cleanup to residential standards is not possible and remediation activity results in the need for continued remediation action and controls; this would include DTSC determination that specific land uses are prohibited and land disturbance cannot occur without prior DTSC notification.

Response: Establishment of such a land use covenant in the event that clean-up to residential standards is not possible and continued remediation activity must be provided for is inherent in the impact statement 11-21 in DEIR chapter 11, Hazards and Hazardous Materials, for "Potential Impacts Due to Exposure to Existing Soil or Groundwater Contamination--Redevelopment Zone 1," which states:

"Implementation of future Project-facilitated development plans for Redevelopment Zone 1 would be dependent upon their clean-up according to DTSC protocols. Project-facilitated development activity within Zone 1 cannot proceed until required remediation actions previously described in subsection 11.1.2 herein have been completed to DTSC satisfaction.

Regarding the status of ongoing Zone 1 remediation program, the description in section 11.1.2, Historical Uses and Ongoing and Future Remediation Activities in Redevelopment Zone 1, on page 11-1 through 11-11 of the DEIR Hazards and Hazardous Materials chapter is adequate under CEQA in that it accurately represents the existing setting at the time the environmental analysis commenced (pursuant to CEQA Guidelines section 15125(a)). In response to this and similar comments regarding the latest status of the Zone 1 remediation program, Appendix 5.4 of this Final EIR, Remediation Status Update for Redevelopment Zone 1, includes the latest documentation (as of October 15, 2008) on the remediation program for the Redevelopment Zone 1 properties. Appendix 5.4 includes two components: (1) a September 2008 "Summary of Environmental Conditions and Planned Remediation of the Former Schlage Lock and Universal Paragon Corporation (UPC) Properties" prepared for the San Francisco Redevelopment Agency by Brownfield Partners, LLC; and (2) a September 8, 2008 memorandum to the San Francisco Redevelopment Agency from the Universal Paragon Corporation (UPC) describing the results of a legal settlement between UPC and the Ingersoll Rand Company regarding responsibility for remaining remediation needs.

In summary, the two documents: (1) explain that a May 28, 2008 legal settlement has transferred ownership of the 12-acre former Schlage property from Ingersoll Rand to UPC and transferred remediation and environmental

liability for the project to Brownfield Partners, remediation/technical contractors, who will undertake the regulatory administration and insurance negotiation process obligation for the remediation effort; and (2) outline the Brownfield Partners-planned remaining remediation activities for the UPC property and an adjacent portion of the former Southern Pacific (SP) Brisbane Rail Yard property, including the latest proposed remediation schedule, proposed remediation approach. The description indicates that the remediation approach includes demolition of the existing buildings, evaluation of the effectiveness of the existing soil vapor extraction and treatment system, further characterization of key areas of the site, preparation and submittal of a remediation Feasibility Study, Combined Remediation Action Plan (RAP) and other remediation documents for DTSC approval; obtaining approval for and implementing the soil and groundwater remediation approach, and performing operation, maintenance and monitoring (O&M) activities as necessary following implementation of active remediation. Presumedly, if the DTSC ultimately requires a land use covenant similar to what is suggested in this comment, the approved remediation program would provide for such a covenant.

LR 1.10 (DTSC) Hazards and Hazardous Materials/Transportation and Circulation--remediation period traffic pattern analysis recommended--DTSC recommends that a traffic pattern analysis be considered to determine if traffic conditions during remediation activities could result in a significant impact.

Response: DEIR on page DEIR page 11-21 states that the proposed remediation under consideration by DTSC will include measures to ensure safe transport and disposal of contaminated soil and groundwater. The proposed remediation program now being finalized by Brownfield Partners in consultation with the DTSC (see response above to comment LR 1.06, and Appendix 4.4, Remediation Status Update for Redevelopment Zone 1, at the back of this FEIR document) will be required by DTSC to include this traffic pattern analysis and will comply with the hazardous materials transport procedures of San Francisco and San Mateo County.

LR 1.11 (DTSC) Utilities and Service Systems--existing and future water demand--has SFPUC demonstrated that current conservation practices reduce water demands by increments consistent with projections stated on DEIR page 15-4? Is there a supporting document for this?

Response: The projected changes in Average Water Use listed in the DEIR were derived from information presented in Table 2 and Table 8B of the City's 2005 Urban Water Management Plan (UMWP). Table 8B presents estimated water demand by sector from 2005 through 2030, based on the conclusions reached by a study titled *City and County of San Francisco Retail Water Demands and Conservation Potential* (M. Hannaford, P.E. & Hydroconsult, Inc., November, 2004). This study identified the reductions in water use expected to occur over time in response to two influences: already adopted plumbing code provisions that mandate the use of water conserving fixtures and appliances, and implementation of SFPUC-sponsored conservation incentive programs that were determined to be socially

acceptable and economically achievable. The rate at which reductions were projected to occur was primarily based on assumptions regarding the rate at which existing fixtures and appliances would be replaced with newer, water saving models. The SFPUC found the results of this study to be reasonable and compelling, and so utilized them in development of the City-wide water demand projections presented in its adopted UWMP.

It is noted that some information listed under Total Water Use in the water demand data presented in the DEIR were transposed at the time of publication. Under both the ***2005 (current)*** and ***2030 (projected)*** headings, the value for System losses should be 7.3 mgd, while the value for Construction, docks & shipping should be 0.2 mgd. This error does not change the totals listed for this column under either heading.

LR 1.12 (DTSC) Utilities and Service Systems--impacts and mitigation measures--water supply adequacy assurance--an explanation is needed on DEIR page 15-7 regarding how the cited SFPUC letter provides assurance from the water supplier that there is sufficient water supply for the project.

Response: The cited SFPUC letter states the proposed redevelopment program would not result in a major expansion of the City's water utility system. In other words, the program would not cause demand to exceed available water supplies or transmission capacities within the year 2030 planning horizon. The Agency was able to make this assessment because the level of development envisioned by the program had been accounted for in growth projections made by the City Planning Department and incorporated into the UWMP. When these projections were combined with the declining per capita water demands discussed in the previous response, the UWMP concluded the City's total water use (excluding groundwater) would increase by less than one half of one percent over existing, 2005 levels. As a result, since the SFPUC already had the demonstrated capacity to deliver this volume of water to the City, and since it had an adopted contingency plan for implementation in the event of a prolonged drought, continued growth over the next two decades would require neither additional supplies nor major expansion of the existing transmission/distribution system. This conclusion allowed the SFPUC to provide an "assurance" of water service for the proposed redevelopment program.

LR 1.13 (DTSC) Utilities and Service Systems--impacts and mitigation measures--existing wastewater collection and treatment--conclusion on DEIR page 15-8 does not appear to be well-supported that the project will only contribute wastewater to an inadequate combined wastewater/storm water system, while retaining/reusing storm water and that there is enough capacity for wastewater only.

Response: The discussion in DEIR section 15.2 only addressed the ability of the City's sewer system to carry dry weather wastewater flows. The system's inability to accommodate wastewater plus high rates of storm water runoff was addressed in DEIR section 12.3, Hydrology and Water Quality Impact and Mitigation Measures, where project-related sewer "overflow" impacts were identified (Impact 12-1 on DEIR page 12-12) and mitigation measures

(Mitigations 12-1A and 12-1B on DEIR pages 12-14 through 12-14) were proposed. It is acknowledged that both wastewater and storm water runoff contribute to these overflows, but it is estimated that the proposed project's peak wastewater flow rate would equal less than 5 percent of its combined wastewater/storm water discharge during a design storm event, and less than one half of one percent of the Sunnydale Basin's total storm water runoff during the same storm.[1] This estimate clearly illustrates that peak runoff volumes are much larger than wastewater volumes, and that far greater system-wide reductions can be achieved with a reduction in storm water runoff than with an equivalent percentage reduction in wastewater flow. In addition, it is more economically efficient and technologically feasible to reduce storm water runoff than it is to reduce wastewater flows. As a result, when assessing its sewer system, the SFPUC determines wastewater capacity on the basis of the much lower dry weather (wastewater only) flow rate, and considers all wet weather capacity shortfalls to be the result of excess storm water runoff. As a result, when assessing its sewer system, the SFPUC determines wastewater capacity on the basis of the much lower dry weather (wastewater only) flow rate, and considers all wet weather capacity shortfalls to be the result of excess storm water runoff. Consequently, the DEIR determined the local sewer system has adequate capacity for the project's *wastewater* flows.

LR 1.14 (DTSC) Utilities and Service Systems--wastewater service--impacts and mitigations--DEIR only discusses dry weather flows and wastewater; however CEQA thresholds of significance refer to whether new (or expansion of existing) storm water facilities may be necessary; the question is not answered here; there should be verification in DEIR that wastewater system has adequate capacity (see Initial Study prepared for this EIR).

Response: As discussed in the response to comment LR 1.13 above, storm water runoff is the principal cause of sewer system overflows. It is acknowledged, however, that the projected 300(+) percent increase in Project Area wastewater flows would incrementally worsen the severity and/or the duration of existing overflows. Accordingly, in order to ensure the

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[1] Estimated existing wastewater flows within the project area: 49,708 gpd
Estimated increase in project area wastewater flows: 161,200 gpd
Total estimated project area wastewater flow: 210,908 gpd
Peak wastewater flow rate = 2.3 x avg. rate: 210,908 x 2.3 = 485,088 gpd = 0.75 cubic feet per second (cfs)

Total project area: 37.9 ac.
Estimated runoff coefficient for 16.3 ac. in Zone 1 = 0.66; for 21.6 ac. in Zone 2 = 0.77
Weighted runoff coefficient: [(16.3 x 0.66) + (21.6 x 0.77)] ÷ 37.9 = 0.72
Peak runoff rate for 1-year recurrence interval/60 minute duration storm: (37.9 ac.) x 0.68 x 0.4" rain/hour = 11.4 cfs
Peak wastewater flow as % of combined sewer discharge: 0.75 cfs ÷ (11.4 + 0.75) = 6.1 %

Total Sunnydale Basin = 717 ac; Estimated runoff coefficient = 0.70
Peak runoff rate for 1-year recurrence interval/60 minute duration storm = (717 ac.) x 0.7 x 0.4" rain/hour = 201 cfs
Project wastewater flow as % of total basin runoff = 0.75 cfs ÷ 201 = 0.37 %

potential wastewater impacts associated with the project are fully mitigated, it is recommended that the project be required to detain, at a minimum, a volume of storm water runoff equivalent to the peak wastewater increase. Details of the detention facility design, such as the appropriate wastewater peaking factor and the minimum storm intensity/return frequency for which runoff would need to be detained, would be specified by SFPUC and the Department of Public Works. In addition, it is further recommended this requirement only apply in the event the project is not required to implement the site design and retention/detention storage mitigation measures described in Mitigation Measure 12-1A, since the SFPUC has determined the storm water regulations now under consideration would include sufficient offset for increases in wastewater flows resulting from future development or change in use.

LR 2



Rajiv Bhatia/DPH/SFGOV
07/08/2008 01:16 PM

To stanley.muraoka@sfgov.org, Tom Evans/REDEV/SFGOV@SFGOV
cc Tom Rivard/DPH/SFGOV@SFGOV, Megan Wier/DPH/SFGOV@SFGOV, Megan Gaydos/DPH/SFGOV@SFGOV
bcc
Subject VV Redevelopment EIR

History: This message has been forwarded.

Hi Stan

Someone from my staff shared a notice for the VV Redevelopment Program EIR with me today.

We'd like to review sections and mitigations related to air quality, noise, hazardous materials, parks, and pedestrian safety, and am hoping that we can provide city staff comments to you after the public comment deadline. Because of competing priorities and my coming to learn about this late, we need about two extra weeks. Also, If possible, could you please forward one hardcopy of the DEIR to my office. **LR 2.01**

In future, it would be great if your office could put me on the distribution list for all CEQA notices so we can provide timely environmental health input and review.

Thanks

Rajiv

Rajiv Bhatia, MD, MPH.
Director, Occupational & Environmental Health,
San Francisco Department of Public Health
Assistant Clinical Professor of Medicine, UCSF
1390 Market Street, Suite 822
San Francisco, CA 94102
415-252-3982 (tel) 252-3818 (fax)
rajiv.bhatia@sfdph.org
www.sfdph.org/eh
www.sfdph.org/phes

"In a time of universal deceit, telling the truth is a revolutionary act." --George Orwell

LR 2.01 (SFDPH)

General--Request from San Francisco Department of Public Health for two additional weeks after July 8, 2008 to review DEIR sections related to air quality, noise, hazardous materials, parks and pedestrian safety.

Response: This FEIR Responses to Comments document includes full consideration and responses to the comments on the DEIR submitted by the San Francisco Department of Public Health; in particular, this FEIR includes responses to letter LR 12 submitted to the Department to the Agency on August 1, 2008. Please see responses herein to comments LR 12.01 through LR 12.20.

CITY OF BRISBANE

50 Park Place
Brisbane, California 94005-1310
(415) 508-2100
Fax (415) 467-4989

LR 3

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July 16, 2008

Tom Evans
San Francisco Redevelopment Agency
1 South Van Ness Avenue
San Francisco, CA 94104

Re: DEIR- Visitacion Valley Redevelopment Program

Dear Mr. Evans:

Thank you for the opportunity to review and comment on the above-referenced document. The City of Brisbane offers the following comments:

1. Section 3.2.1, Project Description. Acknowledge that regional access to the site is provided via US 101 from the Alana/Beatty and Monster Park off ramps; by US 101 from northbound Bayshore Boulevard (multiple on-ramp options); and by I280 via Geneva Avenue. **LR 3.01**
2. Section 3.13, Project Description. The DEIR is intended to function as a project EIR for the proposed redevelopment program within Zone 1 (Schlage Lock site). However, the proposed Visitacion Valley/Schlage Lock Design for Development lacks detail regarding the edge condition between San Francisco and Brisbane, specifically pertaining to grading, circulation, utilities, and surface drainage. It is the City of Brisbane's expectation that subsequent discretionary review (and related environmental documentation) to implement the Visitacion Valley/Schlage Lock Design for Development will address the interface in further detail, and such information will be available for the City of Brisbane's review and comment. Please confirm this is correct. If this DEIR represents the City's only opportunity to comment, we would request that additional edge condition details be provided for the City's review and comment prior to certification of the Final EIR, in order to verify that no adverse environmental impacts result. **LR 3.02**
3. Section 8, Transportation and Circulation.
   a. The DEIR should analyze LOS at the intersections of Bayshore Boulevard/Geneva Avenue (this is a Congestion Management Program intersection) and Tunnel Avenue/Beatty Road, which is expected to have similar impacts and mitigation requirements as the studied Alana/Beatty intersection. **LR 3.03**
   b. As noted in section 8.3.3 of the DEIR, 34% of additional trips are expected to enter and exit on to southbound Bayshore Boulevard. Therefore the Bayshore/Guadalupe Canyon Parkway and Bayshore/Old County Road/Tunnel Avenue intersections should be analyzed to determine potential impacts and any required mitigation.

c. Given that the US101 southbound on-ramp at Alana/Beatty is currently operating at LOS F, then the next most southern on-ramp (Sierra Point Parkway at Lagoon Way) should be analyzed in the traffic study. LR 3.05

d. Beatty Road and Tunnel Avenue are City of Brisbane streets listed as Urban Minor Arterials in the Federal Highway Performance Monitoring System Program as maintained by Caltrans for California. The City of Brisbane's General Plan Policy 38.1 requires that, "The level of service of all arterial streets within the city shall not be less than LOS "D" ...". Therefore the LOS F at Alana/Beatty (and the anticipated LOS F at Beatty/Tunnel) are not acceptable and require mitigation. LR 3.06

e. Mitigation 8-4 should be modified to specify that required improvements to the Alana Way/Beatty Ave intersection shall be subject to City of Brisbane review and approval.

f. Mitigation 8-6 requires a "project fair share contribution" for the Geneva Avenue onramp with Hwy 101 without any explanation as to the basis of determining the "fair share." The fair share contribution should be consistent with the ratios established in the Bi-County Transportation Study jointly funded by the San Francisco and San Mateo Counties' Transportation Authorities. LR 3.08

g. Mitigation 8-8 concludes that the addition of mainline capacity of Hwy 101 segments is infeasible. Elaborate on the basis for this conclusion. Additionally, the EIR should analyze whether investments in regional transit service (such as added service at the Bayshore Caltrain station, including feeder service, or the provision of shuttle service to the Balboa Park BART Station) could help alleviate the need to increase mainline freeway capacity.

h. Section 8.3.6 Impacts on Transit Operation. There is no analysis of whether existing and/or planned (and funded) Caltrain service at the Bayshore station will be adequate to accommodate Project-generated (and/or cumulative) transit demand, and this should be addressed. Current service at the Bayshore Caltrain station is limited to one train per hour in each direction, and it seems unlikely that cumulative transit demand at this station can be accommodated without an increase in service levels, which is currently unfunded. LR 3.10

i. Section 8.3.7 references a temporary pedestrian path to Caltrain as a component of the Design for Development. Clarify that such a path will require City of Brisbane review and approval if within Brisbane city limits as conceptually shown. LR 3.11

j. In regard to Bicycle Impacts (section 8.3.8), it appears that a substantial mode shift as referenced in Table 8.8 is attributable to bicycle usage, due in part to the site's proximity to designated Class II bike routes as referenced in the DEIR. However, the lack of bikeway improvements on the adjacent southerly segments of these bike routes (such as Tunnel Avenue and Bayshore Boulevard) could prove to be an impediment to achieving anticipated bicycle usage. It is recommended that the City work with the City of Brisbane to explore interim bikeway improvements on these routes southerly of the project site which would enhance connectivity and promote bicycle safety. LR 3.12

4. Pages 11-27/11-28, Hazards and Hazardous Materials. The City recommends that any Transportation Plan for hauling of hazardous wastes and/or grading cut/fill material on Brisbane streets be subject to City review and approval. LR 3.13

5. Page 12-5, Hydrology and Water Quality. See comment #2. The final drainage plan for the project should ensure that no stormwater is diverted to other municipalities without their knowledge and consent. **LR 3.14**
6. Page 12-12, Hydrology and Water Quality. While the DEIR concludes that potential runoff issues will be met by the planned construction of the new Sunnydale sewer tunnel, there does not appear to be a mitigation requiring the completion of the Sunnydale sewer tunnel prior to project implementation. Please clarify. **LR 3.15**
7. The City of Brisbane requests the opportunity to review and comment on the project Mitigation Monitoring and Reporting Program (MMRP) as it pertains to the implementation of mitigation measures either directly involving the City of Brisbane, or those which are regional in nature, such as the calculation and collection of "fair share" contributions. **LR 3.16**

Thanks again for the opportunity to review and comment on the DEIR. Please call me at 415.508.2120 should you have any questions regarding this letter, or contact City Engineer Randy Breault at 415.508.2130 should you have questions related to the technical comments pertaining to traffic and/or hydrology.

Sincerely,

John A. Swiecki, AICP
Principal Planner

c: Randy Breault, City Engineer

LR 3.01 (Brisbane)

Project Description--section 3.2.1, Regional and Local Setting--clarifications/revisions to DEIR language regarding regional access requested.

Response: Comment acknowledged. Section 3.2.1, Regional and Local Setting (DEIR page 3-2), has been revised to add this information and to be consistent with the description of project area regional access in section 8.1.1(a), Regional Access, in the DEIR Transportation chapter (DEIR page 8-2).

LR 3.02 (Brisbane)

Project Description--Brisbane/Zone 1 edge conditions--section 3.1.3, Intended Uses of EIR--DEIR intended to function as project EIR for Zone 1 development, but draft Design for Development lacks detail regarding Zone 1/Brisbane edge condition, esp. pertaining to grading, circulation, utilities, and surface drainage. Brisbane expects that subsequent discretionary review and related environmental documentation for the Design for Development will address this interface in further detail and make such information available to Brisbane. If this DEIR represents only opportunity for Brisbane to comment, this additional edge condition information should be provided prior to certification of FEIR.

Response: This DEIR does not represent the only opportunity for the City of Brisbane to comment regarding interjurisdictional issues pertaining to the interface between project Redevelopment Zone 1 (Zone 1) and the adjacent City of Brisbane "Baylands" area.

As noted in this comment, the DEIR is intended to serve as a project EIR for Redevelopment Zone 1 (Zone 1) which is bounded on its southern edge by the county line and Brisbane city limit. The "Baylands" area of the City of Brisbane is immediately south of Zone 1. The DEIR examines the site-specific and cumulative impacts of the proposed Redevelopment Plan, Design for Development, and associated General Plan and Planning Code provisions for this portion of the Project Area. The degree of specificity included in the DEIR for these project components corresponds to the level of specificity known when the DEIR was prepared. In particular, the DEIR describes the proposed Redevelopment Plan and Design for Development development controls and design guidelines for the southern edge of Zone 1 to the extent known at the time the DEIR was prepared (DEIR pages 3-21 through 3-27), including the proposed residential, mixed-use (residential-retail), and park land uses proposed on the southern edge and associated building form and building height characteristics, conceptual provisions for open space, public and semi-public uses, street layout, and other common improvement requirements to be imposed on future development, and other anticipated standards and procedures for development which apply to the southern edge. These project aspects are described and illustrated to the extent known when the DEIR was prepared on DEIR pages 3-14 through 3-27. Associated General Plan land designation and Planning Code designation changes are described and illustrated to the extent known when the DEIR was prepared on DEIR pages 3-27 through 3-35. Associated

growth assumptions for Zone 1 are described to the extent known when the DEIR was prepared on DEIR pages 3-35 through 3-37.

The DEIR has been circulated to the City of Brisbane for review and comment. Development planning for Zone 1 remains conceptual. More detailed site planning, infrastructure and other development specifications have not yet been formulated. As future development plans (applications) are received and reviewed for these areas, the City intends to properly notify and consult with City of Brisbane staff, including the City's planning and engineering staff. The City anticipates a similar interjurisdictional coordination effort by Brisbane staff as Baylands planning and development details evolve.

The Redevelopment Agency Commission has specifically advocated such interjurisdictional coordination. Since this comment was submitted, Redevelopment Agency planning staff has met with City of Brisbane planning staff to discuss the Visitacion Valley/Baylands planning coordination process.

LR 3.03 (Brisbane) Transportation and Circulation--intersection analysis--EIR should analyze LOS at Bayshore/Geneva intersection (a CMP intersection) and Tunnel/Beatty Road intersection.

Response: To address the question raised by this comment, a supplemental transportation analysis was conducted by the EIR transportation consultants, DMJM/AECOM, for the Bayshore/Geneva and Tunnel/Betty intersections under the Existing and Existing Plus Project scenario. The results of this analysis are summarized in the table below. The detailed level of service computation sheets completed to reach the conclusions below are included in Appendix 4.5, Supplemental Transportation Analysis Information, herein.

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		LOS	Delay	LOS	Delay
Existing Conditions					
Tunnel Avenue/ Beatty Road	OWSC[1]	A (wb)	9.8	B (wb)	11.0
Bayshore Boulevard/ Geneva Avenue	Signalized	C	23.4	C	27.2
Existing plus Project Conditions					
Tunnel Avenue/ Beatty Road	OWSC[1]	B (wb)	11.5	B (wb)	13.1
Bayshore Boulevard/ Geneva Avenue	Signalized	C	24.3	C	27.8

[1] OWSC = one-way stop controlled (stop sign); unsignalized.

As shown in the above table, both the intersection of Tunnel/Beatty and Bayshore/Geneva currently operate with acceptable conditions, and would continue to operate acceptably with the project.

However, as discussed in the DEIR, it is anticipated intersection operations would become significantly congested in the future, as a result of the substantial amount of new cumulative development proposed at Hunters Point, Executive Park, Bayview Waterfront (Candlestick Point, India Basin Shoreline, Hunters Point Shipyard), Brisbane Baylands, the Daly City Cow Palace site, and other projects throughout the area, in addition to the proposed Visitacion Valley redevelopment program.

To address these future cumulative operating conditions, major infrastructure improvements would be needed, such as the proposed extension of Geneva Avenue and the new U.S. 101 interchange, associated improvements to the Tunnel/Beatty and Bayshore/Geneva intersection as suggested in this comment, plus improvements to transit and other non-auto modes. As more fully explained in response to comment LR 11.06 herein, the required future changes necessary to these transportation network facilities, and associated priorities and "fair share" funding responsibilities, are currently being evaluated through the on-going, interjurisdictional Bi-County Transportation Study.

LR 3.04 (Brisbane) Transportation and Circulation--intersection analysis--EIR should analyze LOS at Bayshore/Guadalupe Canyon Parkway intersection and Bayshore/Old Country Road/Tunnel Avenue intersection.

Response: Given the location of the project site, only a small number of trips are expected to make use of Bayshore Boulevard south of Geneva Avenue. U.S. 101 provides more convenient access south of the county line via the ramps at Alana Way/Beatty Road or via the new Harney/Geneva interchange. In addition, as discussed in the response to comment LR 3.03, the project would only result in a minor change in delay (less than one second) at the intersection of Bayshore/Geneva. As such, it is anticipated that the effect of the project on intersections further south (such as at Guadalupe Canyon and Old County Road) would be even less.

LR 3.05 (Brisbane) Transportation and Circulation--US 101 onramps--EIR should analyze most southern (Sierra Point Parkway at Lagoon Way) US 101 onramps

Response: It is not expected that a substantial number of project-generated trips would use the U.S. 101 southbound on-ramp at Sierra Point Parkway/ Lagoon Way, as the Alana/Beatty interchange is closer and has more-direct access. Overall, it was estimated that only about 15 percent of project-generated traffic would access U.S. 101 southbound to travel from the project site to points south. Due to its distance from the project site and the relatively low demand volumes, this on-ramp was not included as a study location.

LR 3.06 (Brisbane) Transportation and Circulation--intersection analysis--projected LOS F at Alana/Beatty and anticipated LOS F at Beatty/Tunnel intersection are not acceptable under City of Brisbane's General Plan (requires that LOS shall not be less than D) and require mitigation

Response: As discussed in response to comment LR 3.03 above, the intersection of Tunnel/Beatty is anticipated to operate at LOS D or better

during the peak hours under the Existing and Existing Plus Project scenarios. It should be noted that under 2025 Cumulative conditions with the proposed extension of Geneva Avenue, this intersection would likely be eliminated (or its function reduced). A program for determining the overall future mitigation strategies, priorities and funding mechanisms for such cumulative transportation improvement needs in the area is currently being developed through the Bi-County Transportation Study process. All project-related and region-serving (cumulative) transportation improvement needs that are located in the City of Brisbane would be subject to review and approval by the City of Brisbane.

LR 3.07 (Brisbane) Transportation and Circulation--intersection analysis--Mitigation 8-4 (Alana Way/Beatty Ave. intersection)--add that required improvements shall be subject to City of Brisbane review.

Response: Comment noted. All project-related and region-serving transportation improvement needs that are located in the City of Brisbane would be subject to review and approval by the City.

LR 3.08 (Brisbane) Transportation and Circulation--onramp analysis--Mitigation 8-6 (US 101/Geneva Ave. onramp) does not explain basis of determining "fair share"--fair share should be consistent with jointly funded Bi-County Transportation Study ratios.

Response: The determination of future "fair share" contributions will be included as part of the project's conditions of approval, as dictated by the Redevelopment Agency and/or the Bi-County Transportation Study and related interjurisdictional funding programs. If the results of the ongoing Bi-County Transportation Study are available within the required timeframe for future Zone 1 development approvals, the Redevelopment Agency may choose to utilize those numbers.

LR 3.09 (Brisbane) Transportation and Circulation--freeway segment operation--Mitigation 8-8 for 2005 cumulative impacts on freeway operation with planned regional improvements concludes that providing additional mainline capacity on this US 101 segment is infeasible; elaborate on basis for this conclusion; also, analyze whether investments in regional transit (e.g., added Bayshore Caltrain station service, including feeder service, or Balboa Park BART station shuttle service) would help alleviate segment capacity need.

Response: The freeway network in the vicinity of the project site (namely U.S. 101) is currently built-out, with insufficient right-of-way to expand the freeway for additional mainline capacity without requiring an extensive reconfiguration of several freeway overpass, underpass, and ramp structures. Furthermore, additional mainline capacity in the immediate vicinity of the project may not substantially improve traffic flow, as bottlenecks would occur to the north and south of the segment. Although it may be possible to provide auxiliary lanes between sets of on- and off-ramps, the effect of these auxiliary facilities would be limited to improving the ramp merges and would not increase mainline capacity.

It is likely that planned improvements to regional intermodal transit service (Muni T-Third light rail line, SamTrans, BART and Caltrain) would help to accommodate some of the future growth in travel demand along the corridor. This could be further achieved by improving vehicular, local transit, pedestrian and bicycle access to stations (such as the potential reconfiguration of the Caltrain Bayshore Station to provide a direct connection to the Muni T-Third light rail line, or improved feeder bus service to the Balboa Park BART station).

LR 3.10 (Brisbane) Transportation and Circulation--transit operational impacts--section 8.3.6, Impacts on Transit Service, includes no analysis of whether existing or planned Caltrain service at Bayshore station will be adequate to accommodate project-generated and/or cumulative transit demand--should be addressed--current service limited--ability to accommodate cumulative increase in transit demand without increased service (not currently funded) seems unlikely.

Response: As shown in Table 8.8 of the DEIR (DEIR page 8-29), the project is projected to generate 433 transit trips in the AM peak hour (140 inbound, 293 outbound) and 440 trips in the PM peak hour (255 inbound, 185 outbound). Given the project trip distribution estimates indicated in Table 8.10 of the DEIR (DEIR page 8-29), the project would generate 145 South Bay trips in the AM peak hour (47 inbound, 98 outbound) and 147 South Bay trips in the PM peak hour (85 inbound, 62 outbound). Due to the relatively infrequent Caltrain service planned at the adjacent Bayshore Station (one train an hour), it was estimated that the majority of these project transit trips would use BART, with a smaller percentage using SamTrans.

Recent Caltrain ridership data from 2007 indicates that there is substantial existing capacity on the trains stopping at Bayshore Station, mostly due to the fact that the trains are limited-stop trains, which have longer journey times compared to Baby Bullet service. The table below summarizes the maximum loads for AM peak period southbound and PM peak period northbound trains at Bayshore Station.

Train	Arrives / Departs Bayshore Station	Maximum Load	
		Passengers	Station
208	6:34 AM	169	San Carlos
218	7:34 AM	190	San Carlos
228	8:34 AM	122	Belmont
263	5:13 PM	143	San Mateo
271	6:13 PM	187	Belmont
281	7:13 PM	108	Hayward Park

Source: Caltrain, 2007.

Given that the trains have a capacity of approximately 650 passengers, the data above indicates that there is substantial excess capacity on existing trains at Bayshore Station to handle additional transit demand.

Some percentage of transit riders may choose to take Caltrain for San Francisco trips, but given the comparatively poor frequency, limited number of stop locations, and distance between the Fourth/King terminal and major activity centers in the greater downtown area (Financial District, Union Square, Civic Center, and Chinatown), this number is expected to continue to be fairly low under the potential extension to Transbay Terminal scenario.

In the future, the combined planned developments at Brisbane Baylands, Executive Park and Bayview Waterfront (Candlestick, Hunters Point Shipyard and India Basin), in addition to the proposed project, would increase the cumulative demand for transit service in the area. In particular, there is anticipated to be an increase in Caltrain ridership at the Bayshore Station, primarily in the reverse peak direction (from these developments to job centers on the Peninsula and in the South Bay). Caltrain has previously discussed providing additional service by electrifying the line and increasing the frequency of the trains that stop at the Bayshore Station (currently, only one of six trains stop). In addition, planned improvements to Muni transit service to the corridor (more stops and more frequent service, etc.) are expected to encourage increased ridership.

As part of the ongoing Bi-County Transportation Study, a more detailed review of the area-wide transit ridership and capacity is currently being conducted, and will include an assessment of area-wide conditions and recommendations to improve future transit capacity levels.

LR 3.11 (Brisbane) Transportation and Circulation--pedestrian impacts--operation--D4D-proposed temporary pedestrian path to Caltrain station referenced in DEIR section 8.3.7, Pedestrian Impacts, should be clarified to indicate need for City of Brisbane review and approval if within Brisbane city limits as shown.

Response: Comment noted. All future pedestrian improvements that are located in the City of Brisbane would be subject to review and approval by the City.

LR 3.12 (Brisbane) Transportation and Circulation--bicycle impacts--section 8.3.8, Bicycle Impacts, appears to assume substantial mode shift to bicycle usage due partly to site convenience to designated Class II bike routes--lack of improvements to southern segments of these routes (e.g., Tunnel Ave. and Bayshore Blvd.) could impede bicycle usage--Cities should explore together interim bikeway improvements here (southerly of project site) to enhance bike connectivity and promote bike safety.

Response: As discussed in DEIR section 8.1.4, Bicycle Conditions, on DEIR page 8-17, there are several San Francisco bicycle routes in the vicinity of the project site, including bicycle lanes on Bayshore Boulevard, bicycle lanes on Tunnel Avenue, and bicycle routes on Alana Way, Harney Way, and Blanken Avenue. On typical weekdays, bicycle activity in the immediate area is light throughout the day, with bicyclists observed using the on-street bicycle facilities and other area-wide streets.

Based on the travel demand analysis conducted for the project, it was conservatively estimated that about 16 percent of the future trips would be by "other" modes that include walk, bicycling, taxi, and additional modes, a portion of which would be on bicycle for their primary modes.

In general, it is likely that most project bicycle trips would be destined to downtown (for work) or one of the nearby attractions within the greater Visitacion Valley and Bayview districts. Due to the relative paucity of bicycle attractions to points south (with the exception of the office developments at Sierra Point), it is anticipated that the current San Francisco bicycle facilities could accommodate these trips.

However, independent from this project, the City and County of San Francisco, the County of San Mateo, and the City of Brisbane should collaboratively explore means to improve bicycle facilities and access throughout the area.

LR 3.13 (Brisbane) Hazards and Hazardous Materials--Transportation Plan review--Brisbane requests that any Transportation Plan for hauling hazardous waters and/or grading cut/fill material on Brisbane streets be subject to Brisbane review and approval (DEIR pages 11-27 and 11-28).

Response: As indicated in response to comment LR 3.02 on FEIR p. 3-4, the Agency and Planning Department intend to continue to properly notify and consult with the City of Brisbane regarding discretionary planning activities that may significantly affect the City of Brisbane, including any Project Area-related proposed hazardous materials remediation transport plan involving Brisbane streets. Please also see response to related comment LR 1.10.

LR 3.14 (Brisbane) Hydrology and Water Quality--final drainage plan--re: DEIR page 12-5, project final drainage plan should ensure that no stormwater is diverted to other municipalities without consent.

Response: Section 1101.1.1 of the San Francisco Amendments to the California Plumbing Code requires that storm water runoff from all areas larger than 200 square feet must drain to the City sewer system or to a City storm drain system (there are no storm drain-only facilities in the project vicinity). Drainage from areas smaller than 200 square feet may be contained within a property's boundary, with no outlet, so long as it does not result in a nuisance (such as standing water that could breed mosquitoes). As these provisions make clear, discharge of runoff from the proposed redevelopment site into the City of Brisbane is already prohibited by the City's Plumbing Code, so the small amount of overland drainage that may now cross the boundary of the Schlage property into Brisbane would have to be contained and redirected on-site at the time of development.

LR 3.15 (Brisbane) Hydrology and Water Quality--Sunnydale sewer tunnel assumption--DEIR findings based on assumed construction of new Sunnydale sewer tunnel, but no mitigation in DEIR requiring completion of tunnel prior to project implementation; please clarify.

Response: The mitigating effects of the proposed Sunnydale sewer tunnel were noted as a potential offset to minor project-related impacts that *could* result if assumptions made in the DEIR about existing and proposed runoff conditions were incorrect. It is acknowledged the tunnel may never be built, or its construction could be substantially delayed. However, the discussion on DEIR page 12-12 indicates these speculative impacts would only result in "small increases in existing runoff rates." As a result, the increases themselves would be less than significant, and it is fully expected they would be completely offset by reductions in runoff within Zone 1, with or without the new sewer tunnel.

LR 3.16 (Brisbane) Mitigation Monitoring and Reporting Plan--City of Brisbane requests opportunity to review MMRP as it pertains to measures directly involving Brisbane or otherwise regional in nature, such as calculation of "fair share" contributions.

Response: Comment is noted. San Francisco Planning Department and Redevelopment Agency staff will continue to consult with City of Brisbane staff regarding substantive project-related interjurisdictional matters, including any proposed fair share mitigation responsibilities affecting the City of Brisbane. Please also see response herein to comment LR 11.06, which describes the currently ongoing interjurisdictional Bi-County Transportation Study effort.

LR 4

July 18, 2008

Mr. Tom Evans, Lead Planner
San Francisco Redevelopment Agency
1 South Van Ness Avenue, Fifth Floor
San Francisco, CA 94103

Re: Visitacion Valley Redevelopment Program

Dear Mr. Evans:

On Wednesday, July 16, 2008, the Landmarks Preservation Advisory Board (Board) held a public hearing and took public comment on the Draft Environmental Impact (DEIR) for the Visitacion Valley Redevelopment Program dated June 3, 2008. After discussion the Board arrived at the following comments on the DEIR:

- The Board suggested including the design guideline criteria developed for the Schlage Lock site as a mitigation measure in the EIR. **LR 4.01**
- Furthermore, the Board felt that the preservation alternative could be more detailed including how the buildings could be re-used and the overall analysis including how the alternative would relate to housing needs, population and overall use of the site in relation to the plan area. **LR 4.02**
- The Board recommended that the preservation alternative be more realistic; an alternative that can be implemented. **LR 4.03**
- The Board feels that under Aesthetics (pg. 17.4.2d) that preserving historic buildings can be a beneficial aesthetics affect. **LR 4.04**

The Landmarks Preservation Advisory Board appreciates the opportunity participate in the review of this environmental document.

Sincerely,

M. Bridget Maley, President
Landmarks Preservation Advisory Board

LR 4.01 (LPAB) Visual Factors--Schlage Lock design criteria--Landmarks Preservation Advisory Board (LPAB) suggests including the design guideline criteria developed for the Schlage Lock site as a mitigation in the EIR.

Response: The development controls and design criteria included in the Redevelopment Plan and Design for Development are included in the EIR as part of the "Project," and would go into effect upon City/Agency adoption of the Redevelopment Plan and Design for Development. Also, the additional mitigation needs identified in the DEIR by the EIR authors to address identified potentials for significant aesthetic and cultural and historic resource impacts have been incorporated into the latest version of the Design for Development.

LR 4.02 (LPAB) Alternatives--preservation alternative--LPAB feels that preservation alternative description could be more detailed, including how buildings could be re-used and how alternative would relate to housing needs, population and overall use of the plan area

Response: The level of detail in the DEIR discussion of "Alternative 4: Preservation and Re-Use of All Schlage Lock Plant 1 Buildings" has been governed by CEQA Guidelines section 15126.6(d) (Discussion and Consideration of Alternatives, which indicates that the EIR comparison of the impacts of the identified alternatives "is intended to be less detailed than the discussion of the impacts of the proposed project."[1] Following that guideline, the discussions in this chapter of the comparative impacts of the six identified alternatives to the proposed Project are intentionally less detailed than the discussions in EIR chapters 5 through 15 of the significant impacts of the proposed Project.

The DEIR description of this preservation alternative does indicate on DEIR page 17-16 how the buildings could be re-used (as a community center), consistent with the previous suggestion of the LPAB), and does indicate on DEIR page 17-17 that, in comparison to the proposed Project, this preservation alternative would have "a reduced *beneficial effect"* in assisting San Francisco in achieving: (a) increased housing opportunity in the Visitacion Valley neighborhood; (b) a better citywide balance between employed residents and jobs; (c) more housing concentration near commercial uses, transit, and other services; and (d) associated decreases in the current in-commuting trend." Also, Table 17.1 on DEIR page 17-6 in the Alternatives chapter indicates that the preservation alternative would accommodate up to approximately 1,385 net additional residential units, versus 1,586 net additional residential units for the proposed Project, the same amount of retail space as the proposed Project, and would accommodate approximately 189,550 square feet of additional cultural/ institutional/educational floor space in comparison to the proposed Project.

[1]CEQA Guidelines section 15126.6(d) states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

However, reiterating what is explained on DEIR page 17-17 with regard to this building preservation and re-use alternative, according to DTSC,[1] this alternative could impede hazardous materials remediation because the Schlage Lock Plant 1 buildings, which would be preserved under the alternative, could have contaminated soils underneath them; any such soils would be more difficult to access and remediate.

LR 4.03 (LPAB) Alternatives--preservation alternative--LPAB recommends that preservation alternative be more realistic and implementable.

Response: The comment is in reference to DEIR identified "Alternative 4: Preservation and Re-Use of All Schlage Lock Plant 1 Buildings." The description of Alternative 1 in the DEIR is as intended to be exactly as suggested by the S. F. Landmarks Preservation Advisory Board (LPAB), which provided valuable ongoing input and assistance to the EIR authors towards preparation of the DEIR Cultural and Historical Resources chapter of the DEIR (DEIR chapter 10). The adaptive use suggested by the LPAB for Buildings B and C, a community center, was derived from input received during the extensive series of community workshops conducted for the program. The financial viability of such an alternative use has not been evaluated as part of the EIR. Other uses or combinations of uses that may have more economic viability than a community center could certainly also be considered in the future, after the EIR is certified, with no need for additional CEQA analysis, provided that their environmental implications are not substantially greater than described in the DEIR for the proposed Project.

CEQA Guidelines section 15126.6(b), Consideration and Discussion of Alternatives, states "the discussions of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project"...[in this case, effects on historic resources]..."even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

LR 4.04 (LPAB) Alternatives--preservation alternative--aesthetics--DEIR section 17.4.2(d) on p. 17-17 should indicate that preservation of historic buildings can have a beneficial aesthetics effect.

Response: Comment acknowledged. Table 17.2, Alternatives Comparison to the Proposed Project: Summary Overview, does indicate that Alternative 4, the Additional Building Preservation Alternative, would have reduced aesthetic impacts in comparison to the proposed Project, but this conclusion was not repeated in the section 17.4.2(d) text. In response to this comment, the text in this section on DEIR page 3-47 has been revised to indicate a comparatively "beneficial aesthetics effect" (see revised version of DEIR page 3-47 in section 4, Revisions to the Draft EIR).

[1]Barbara J. Cook, P.E., Chief, Northern California Coastal Cleanup Operations Branch, State Department of Toxic Substances Control (DTSC); written communication, April 11, 2008.

LR 5

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

July 18, 2008

RECEIVED
SFRA
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1-1942-244
RECORDS DEPT.

Tom Evans
San Francisco Redevelopment Agency
1 South Van Ness Avenue, 5th Floor
San Francisco, CA 94103

Subject: Visitacion Valley Redevelopment Program
SCH#: 2007022049

Dear Tom Evans:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 17, 2008, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. LR 5.01

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2007022049
Project Title Visitacion Valley Redevelopment Program
Lead Agency San Francisco Redevelopment Agency

Type EIR Draft EIR

Description NOTE: Co-Lead Agencies: San Francisco Redevelopment Agency & City and County of San Francisco.

Adoption and implementation of a redevelopment program for an approximately 46-acre project area extending on both sides of Bayshore Boulevard roughly between Sunnydale Avenue and Blanken Avenue in San Francisco's Visitacion Valley neighborhood. Intended to facilitate re-use of the vacant Schlage Lock property and revitalize other properties.

Lead Agency Contact

Name Tom Evans
Agency San Francisco Redevelopment Agency
Phone (415) 749-2539 **Fax**
email Tom.Evans@sfgov.org
Address 1 South Van Ness Avenue, 5th Floor
City San Francisco **State** CA **Zip** 94103

Project Location

County San Francisco
City San Francisco
Region
Lat / Long 37° 42' 16" N / 122° 24' 19" W
Cross Streets Bayshore Boulevard and Leland Avenue
Parcel No. Various
Township **Range** **Section** **Base**

Proximity to:

Highways 280, US 101
Airports
Railways Caltrain, UPRR
Waterways San Francisco Bay
Schools SF, Daly City, Brisbane
Land Use Mixed use residential, retail, commercial, cultural/educational, open space, and vacant
Zoning/General Plan: Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

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

Date Received 06/03/2008 **Start of Review** 06/03/2008 **End of Review** 07/17/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

LR 5.01 (OPR)

General--State Clearinghouse has submitted DEIR to selected state agencies for review, review period has closed, and lead agency has complied with State Clearinghouse review requirements.

Response: Comment from OPR verifying CEQA compliance noted; no further written response is necessary.

LR 6

RMorine@aol.com
07/21/2008 11:51 AM

To Tom.Evans@SFGOV.ORG
cc
bcc
Subject DEIR comments

Tom

Attached and below are a few comments regarding the DEIR. Mostly minor. Overall, its a very solid document that seems to cover all the bases. Lets hope it moves quickly through the approval process.

Russel

.....

Comments: D.EIR Visitacion Valley /Schlage Lock Survey Area
Russel Morine

Section 3.6.8
Econ Revitalization:
4th bullet point *"the village center"* and 3rd bullet point on next page *"central shopping area"* ...Use of terms inconsistent but are describing the same area. I suggest using the term *"Leland / Bayshore Shopping District"* **LR 6.01**

The number of "parks" should not be mandated at 3. As stated before, the feasibility of building a "park" above the Caltrain tunnel has not been verified. **LR 6.02**

Fig 3.6 **LR 6.03**
Beatty rd mislabeled?

Fig 3.8
RR Row has no height designation (maybe I'm reading it wrong) **LR 6.04**

Map 3.12
RTO? What are the parking ratios(might be addressed in another document) **LR 6.05**

Page 3-38 bullet #5
Library bullet point : The site is 10,000 square feet the building is 8,700 square feet (see below) **LR 6.06**

Cumulative impacts
Fig 5.1 Consider adding the Sunnydale / HopeSF proposal the map. **LR 6.07**

Section 6.1.3
Stated VV median household income is incorrect. Explain how this number was determined because based upon 2000 census (based upon VV Census tracts?) The actual number is much **LR 6.08**

closer to the citywide median.

Also, VV has a significantly higher average household density. If these figures are used to project future population trends, the result would be higher then the 6,000 figure presented in this document. Will this increase the need for public services? LR 6.09

Mitigation 7-1 p7-19 ....
Explain where in the D4D where this will be addressed. LR 6.10

Section 14.5.1
The square footage of the site for the new library is approximately 10,000 sq ft but the building itself is in the 8,700 sq ft range. LR 6.11

Section 14.5.4 states the current concept for the new library "took into account the future revitalization of the Project Area". However, the current size and concept for the new library was projected well before the population figures for the Schlage site had been calculated. *The point here is that the current library is based upon erroneous population figures that underestimate the population increase associated with the development of the Schlage site. I do not expect the library will be redesigned to address this, but the EIR should not make statements that can be used to undermine future efforts to increase the capacity of the library if the need should arise.* LR 6.12

In general, the entire section on traffic impacts is very confusing. Include maps to illustrate how conditions will change after the project is developed. LR 6.13

One mitigation measure that could reduce peak traffic is onsite / walking distance job generators. Consider including this as a traffic reducing mitigation measure. LR 6.14

Mitigation 9-1 Air Quality
No mention of post demo air quality issues resulting from inactive parcels after demo (clean but awaiting construction). Add language that addresses interim dust control measure. *This may be addressed in another document, but I have not seen it as of yet.* LR 6.15

Mitigation 10-2, 10-3, 10-4
Any pre history/ archeological / historic related "discover' notification should also include concurrent notification of designated members of the community. LR 6.16

Get fantasy football with free live scoring. Sign up for FanHouse Fantasy Football today.

LR 6.01 (Morine) Project Description--need for consistent terminology--in section 3.6.8, terms "the village center" and "central shopping area," both referring to the same area are inconsistent; suggest using term "Leland/Bayshore Shopping District"

Response: In DEIR section 3.6.8, the terms "the village center" and "central shopping area" on pages 3-19 and 3-20, respectively, are direct quotes from the January 2008 Preliminary Report. In response to this comment, both terms have been revised in the DEIR to read "central shopping district." See these revisions to DEIR pages 3-19 and 3-20 in section 3 herein, Revisions to the Draft EIR. Similar revisions have been made to the Report to the Board on the Visitacion Valley Redevelopment Plan Adoption (see DEIR page 3-40 for a description of this document).

LR 6.02 (Morine) Project Description--parks--number of parks should not be mandated at three--referring to DEIR page 3-21, *Public Open Space*, first bullet; and feasibility of building a park above the Caltrain tunnel has not been verified

Response: The number of parks indicated for assistance on page 3-21 is directly quoted from the City/Agency-prepared January 2008 Preliminary Report and January 2008 Design for Development. The DEIR project description narrative on this page 3-21 is simply reiterating what these two documents specifically propose. These comments regarding project area park provisions will be considered by the Redevelopment Agency and Planning Department as the proposed Redevelopment Plan and Design for Development are finalized.

LR 6.03 (Morine) Project Description--Figure 3.6--Beatty Road mislabeled?

Response: Comment acknowledged. The map on Figure 3.6 is directly reproduced from the January 2008 draft Design for Development. The "Beatty Rd" label has been eliminated in the final version of the Design for Development in response to this comment. A revised version of DEIR Figure 3.6 (DEIR page 3-22) with this correction is included in section 3 herein, Revisions to the Draft EIR.

LR 6.04 (Morine) Project Description--Figure 3.8--contrary to what figure indicates, railroad ROW has no height restriction.

Response: Comment acknowledged. Figure 3.7 has been revised in response to this comment to indicate no height restriction on the railroad right-of-way.

LR 6.05 (Morine) Project Description/Transportation and Circulation--Figure 3.12--what are parking ratios for Residential Transit Oriented (RTO) district (might be addressed in another document)?

Response: For residential developments in RTO districts, parking up to three cars for each four dwelling units is permitted. Parking up to one car for each dwelling unit may be provided as a conditional use, but parking above one

car for each dwelling unit is not permitted (see Section 151.1 of the *San Francisco Planning Code*).

As indicated in section 3.9.2(a) on DEIR page 3-34, the newly-formed RTO district would have "a reduced parking requirement in recognition of transit proximity." In Zone 1, the Design for Development will establish site-specific development controls, including parking requirements. As indicated in DEIR section 8.3.9 on DEIR page 8-67, the Design for Development proposes that "all added residential units within the Project Area would be allowed to provide up to one off-street parking space for each unit." In addition, on-street parking spaces would be provided throughout Zone 1. No minimum parking requirement is proposed.

LR 6.06 (Morine) Project Description--library characteristics--fifth bullet on DEIR page 3-38: library site is 10,000 square feet and library building is 8,700 square feet (see comment 6.11.

Response: The Redevelopment Plan and Design for Development intentionally indicate a conservatively high estimated size for the planned new branch library of 10,000 square feet. More recent design program information indicates that the final design floor area will be 8,500 to 8,700 square feet as the commenter indicates. This 1,300-1,500 square-foot floor area difference does not substantively affect any of the DEIR impact or mitigation conclusions pertaining to library services (DEIR section 14.5.4, Increased Demand for Library Services).

LR 6.07 (Morine) Land Use--Figure 5.1 (Substantive Development Sites in Project Vicinity)--consider adding Sunnydale/Hope SF proposal to map.

Response: As stated on DEIR page 5-3, paragraph 5, CEQA Guidelines section 15130 (Discussion of Cumulative Impacts) authorizes the lead agency to limit cumulative analysis of probable future projects to those which are planned or have an application made at the time the NOP is released. Accordingly, Table 5.1 lists recently approved and pending substantive development projects in the southeast area of the City shortly after the NOP release date for this EIR (the NOP was released on January 13, 2007). The Sunnydale/Hope SF development prospect did not meet this listing criteria; the development prospect is not a recently approved or pending project (no application has been submitted) and information on the prospect is speculative and insufficient for its consideration as a foreseeable project under CEQA. The San Francisco Housing Agency in partnership with the San Francisco Mayor's Office of Housing has issued a Request for Qualifications (RFQ) seeking an interested developer for this site, and it is generally understood that the current goal is to replace existing with new housing on-site at approximately a one-to-one ratio with additional market rate and affordable units.

LR 6.08 (Morine) Population and Housing--project area population and housing--Visitacion Valley median household income--in DEIR section 6.1.3, stated Visitacion Valley median household income is incorrect; explain how this number was

determined based on 2000 Census; actual number is closer to citywide median.

Response: The median income information in DEIR section 6.1.3 has been removed from the document since it has no relevance to a physical environmental effect. CEQA Guidelines section 15064(e) notes that an economic or social factor by itself would not be considered an environmental effect.

Median income and other demographic information on the Project Area are described in chapter XVI of the Report to the Board on Visitacion Valley Redevelopment Plan Adoption prepared for the Redevelopment Agency by Seifel Consulting, and available for review at the offices of the San Francisco Redevelopment Agency, 1 South Van Ness Avenue, Fifth Floor, San Francisco, CA 94103, contact: Tom Evans, Lead Planner (telephone 415-749-2539).

LR 6.09 (Morine) Population and Housing--project area population and housing--housing density; Visitacion Valley has significantly higher average household density than indicated in DEIR section 6.1.3; if these figures are used to project future population trends, this would result in a higher figure than the 6,000 population figure presented in this document (Table 6.4). Will this increase the need for public services?

Response: The Project Area population density figure described in section 6.1.3 is for the existing setting. Population based impact findings in the DEIR were based on the projected "with project" household size average described in DEIR section 6.3.3, Impacts and Mitigation Measures. As explained by the DEIR Table 6.3 footnotes (DEIR page 6-6), the estimates in Table 6.3 of projected population with the project, which were used in DEIR chapters 14, Public Services, and 15, Utilities and Service Systems, to evaluate project impacts, assume an average household size in the Project Area of 3.72 persons in 2025, as suggested by the Redevelopment Agency and Planning Department for new units constructed in the Project Area between now and 2025. The 3.72 persons per household figure estimate is intentionally high, based on the "family" housing emphasis of the proposed redevelopment program and may result in conservative over-estimates in the DEIR of project population-related environmental effects.

LR 6.10 (Morine) Visual Factors--Mitigation 7-1 (Building Scale Compatibility impacts)--(mitigation calls for adding additional building bulk and/or building articulation controls to D4D)--where in D4D will this be addressed?

Response: After certification of the EIR, many of the EIR-identified mitigations, including Mitigation 7-1, will be implemented by incorporating them into the project (i.e., the Design for Development) as stipulated conditions of approving the project, pursuant to CEQA Guidelines section 15126.4(a)(2) which states that "In the case of the adoption of a plan, ...mitigation measures can be incorporated into the plan...."

LR 6.11 (Morine)

Public Services--library services--square footage of site for new library is approx. 10,000; square footage of building itself is approx. 8,700 (DEIR page 14-16, second paragraph).

Response: Comment acknowledged. Early formulation of anticipated Project Area growth numbers for EIR purposes conservatively estimated the replacement library branch size at 10,000 square feet to be "safe." When subsequent more detailed planning for the new branch specified an 8,500 to 8,700 library floor area, the EIR authors elected to retain the original 10,000 square foot number in the interest of efficiency; it was determined that the 1,300 to 1,500 square-foot difference in library floor area would have no substantive effect on the DEIR impact and mitigation findings.

LR 6.12 (Morine)

Public Services--library services--impacts and mitigations--increased demand for library services--current library based on erroneous population figures for Schlage Lock site; population underestimated; library not expected to be redesigned because of this, but EIR should not make erroneous statements that can be used to undermine future efforts to increase library capacity.

Response: Please see responses to related Comments PC 1.03 and LR 6.11 above, and similar comment LR 6.09 in subsection 3.2.4, Population and Housing comments, herein.

LR 6.13 (Morine)

Transportation and Circulation--need to clarify transportation impacts and mitigations-- entire section very confusing; need to include maps to illustrate how conditions will change after project is developed.

Response: In response to this and similar comments regarding the need to provide a clear summary of the various DEIR-identified transportation network mitigation needs for the three analysis scenarios--Existing Plus Project, 2025 Cumulative Plus Project, and 2025 Cumulative Plus Project with Planned Regional Transportation Improvements, a summary chart entitled "Visitacion Valley Redevelopment Program--Roadway System Impacts and Mitigation Summary" has been formulated and included in Appendix 4.5 (Supplemental Transportation Analysis Information) herein. The chart lists each study intersection, freeway segment and freeway ramp addressed in the DEIR traffic analysis, and summarizes associated impact and mitigation findings for each of the three analysis scenarios.

With regard to the various roadway system operational impact findings, "massive gridlock" is not projected; rather, the analysis concludes that under the Existing Plus Project scenario without mitigation, peak hour operational ("level of service" or LOS) conditions--i.e., the average delay per vehicle--at five intersections along Bayshore Boulevard--Bayshore/Blanken, Bayshore/Arleta/San Bruno, Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnydale--could potentially be increased in the AM peak hour without mitigation from current durations of between 12 and 31 seconds per intersection to durations greater than 50 to 80 seconds--i.e., increases in delay of greater than 40 to 65 seconds at each of these five intersections.

Peak-hour operational (LOS) conditions under the Existing Project scenario in the PM peak hour without mitigation would also be reduced due to the Project, with the Project creating a potentially significant increase in peak hour delays at two intersections--Bayshore/Arleta/San Bruno and Bayshore/Leland, from current durations of between approximately 25 and 28 seconds to durations greater than 80 seconds--i.e., increases in delay of greater than 22 to 25 seconds. Implementation of DEIR-recommended mitigations--individual development Transportation Management Plans (TMPs) and elimination of the Project-proposed left-turn lane from southbound Bayshore into Zone 1 at Leland (Mitigations 8-1B and 8-1C) would reduce the degree of added delay, but not to less than significant levels.

The analysis also concludes that under the 2025 Cumulative with Project and Planned Regional Transportation Improvements scenario, peak hour operational (LOS) conditions would be similarly reduced due to the Project. The Project would contribute "significantly" to cumulative increases in AM peak hour operational (LOS) conditions at four intersections, including three intersections along Bayshore--Bayshore/Leland, Bayshore/Visitacion, and Bayshore/Sunnyvale--and the Tunnel/Blanken intersection. Without mitigation, AM peak hour delays at these intersections with or without the Project could increase to greater than 80 seconds at Leland and Sunnydale and to between 44 and 75 seconds at the other two intersections (current AM peak hour delays at these four intersections range from 12 to 31 seconds).

The Project would contribute "significantly" to cumulative increases in PM peak hour operation (LOS) conditions at two intersections, both along Bayshore--Bayshore/Arleta/San Bruno and Bayshore/Leland. Without mitigation, PM peak hour delays at these two intersections with or without the Project could increase to between 68 and 74 seconds (current PM peak hour delays at these two intersections are between approximately 25 and 28 seconds).

With implementation of the DEIR-proposed mitigations (signal timing and other design modifications, including possible through- and turning-lane restriping), the Project contribution to these projected cumulative future AM and PM peak hour delays could be reduced to a less-than-significant level; however, because these intersection design changes could have adverse effects on Muni transit operations along Bayshore, they will need to be further explored. In this light, the DEIR has described the Project contribution to these projected future peak hour intersection delays as significant and unavoidable.

LR 6.14 (Morine)

Transportation and Circulation--mitigation--one measure that could reduce peak traffic is onsite walking distance job generators; consider including this as a traffic-reducing mitigation measure.

Response: The Design for Development (Zone 1) development program already includes an emphasis on mixed use. As shown in Table 3.1 on DEIR page 3-36, buildout of Zone 1 under the Design for Development would result in approximately 1,253 residential units plus 105,000 square feet of

commercial (primarily retail) development. Further increasing the amount of job-producing uses in Zone 1 could increase the mode share for pedestrian and bicycle travel as compared to total travel demand, but would also increase the net vehicle trips generated by the project, since these uses would also attract workers from outside Zone 1 and would attract visitors as well. Any increase in external trip making would also increase the project's contribution to impacts on offsite intersections and freeway facilities in the vicinity. It may also be difficult to regulate Zone 1 job-generating uses such as offices to only hire employees living within walking distance of Zone 1. While smaller-scale versions of such a concept--i.e., live-work units--have been implemented in many projects, it would be difficult to implement a similar relationship for large job generators that often require a diverse array of job positions.

LR 6.15 (Morine) Air Quality--mitigation--Mitigation 9-1 (Remediation- and Construction-Related Air Quality Impacts)--no mention of post-demo air quality issues resulting from inactive parcels after demo--add language addressing interim dust control.

Response: The following has been added to Mitigation Measure 9-1A on Page 9-17 in response to this comment: *"Apply (non-toxic) soil stabilizers to demolition areas after completion of demolition activities."*

LR 6.16 (Morine) Cultural and Historical Resources--mitigation--for Mitigations 10-2, 10-3 and 10-4, and discovery notification procedure should include notification of designated members of the community.

Response: Comment acknowledged. This revision has been added to each of these mitigations. Please see these revision to DEIR pages 10-27, 10-32 and 10-35 in section 3, Revisions to the Draft EIR, herein.

LR 7

anne seeman
<sguanne@yahoo.com>
07/21/2008 01:32 PM
Please respond to
sguanne@yahoo.com

To Tom.Evans@sfgov.org
cc
bcc
Subject Re: Schlage draft EIR

Monday, July 21, 2008

Hi Tom,

As a supporter of development at Schlage, I still find the traffic issues problematic and not satisfactorily mitigated. I am referring to the "F" rating given to our major intersections, on page 8-53. **LR 7.01**

The Geneva extension is vital, but what is the timeline for that compared with the development at Schlage? Also, I would like to see the traffic impacts on both San Bruno Avenue to Alemany, and Bayshore Boulevard to Chavez studied. These are the alternate routes we take when the freeway is jammed, and even when Arleta Avenue is backed up. **LR 7.02** **LR 7.03**

Public transportation really needs to become much faster, in order to encourage ridership. The T line should have either an express or make fewer stops, maybe by running on even and odd alternating routes. Free fast passes for residents at the Schlage site are worth trying, as well as more express buslines. **LR 7.04**

I am the mother of a child with asthma, thus I am not enthusiastic about an increase in idling engines on residential streets. I realize geography limits the possibilities for alternate routes in and out of the neighborhood, but with all the development coming our way, we really need stronger measures to mitigate the inevitable problems. **LR 7.05**

I request analysis of the impacts of the proposed regional serving retail in the Candlestick and Baylands developments, on the southeast sector of the city including Visitacion Valley. Though this is not planned for Schlage itself, I would like to see comparison of traffic impacts, and air quality, with and without such establishments. **LR 7.06**

Given the impacts on traffic, we need further discussion on density. Maybe a compromise with the developer is possible. **LR 7.07**

Sincerely,
Anne Seeman
523 Campbell Avenue
San Francisco, CA
94134

LR 7.01 (Seeman) Transportation and Circulation--mitigation--traffic issues problematic and not satisfactorily mitigated--referring to the LOS "F" rating given to major intersections on DEIR page 8-53.

Response: Given the right-of-way and other geometric constraints at these intersections (such as the signal timing and right-of-way requirements for the T-Third light rail line), mitigating the future conditions at these intersections to acceptable operations (i.e., LOS D or better) is not feasible. However, a portion of the intersections would improve with implementation of the anticipated regional roadway changes described in the DEIR [see DEIR pages 8-45, 8-46 (Figure 8.4: Anticipated 2025 Roadway Network Improvements) and 8-57], including the extension of Geneva Avenue and the new US 101 interchange. It should be noted that as conditions worsen for vehicular traffic, it is likely that residents' travel behavior will adapt to take increasing advantage of the various transit facilities in the vicinity of the project, including the T-Third Street light-rail line and Caltrain.

LR 7.02 (Seeman) Transportation and Circulation--need for Geneva Extension--need for Geneva Extension is vital; what is timeline for extension compared with the development of Schlage?

Response: As discussed in the DEIR assessment of future 2025 Cumulative and 2025 Cumulative Planned Regional Improvement scenarios (see DEIR pages 8-45, 8-46, and 8-57 through 8-62), there are several anticipated future transportation infrastructure projects in the vicinity that would improve intersection operating conditions and help offset the anticipated increase in vehicular traffic volumes from the nearby major development projects, including the proposed Geneva Avenue extension. A separate programming environmental review and clearance procedure is underway by the City of Brisbane for the roadway extension and the associated Brisbane Baylands Specific Plan Phase 1 and 2 project. Although the timeline for implementation has not yet been finalized, it is likely that the extension would be required to be constructed prior to substantial buildout of Brisbane Baylands. The Redevelopment Agency and Planning Department in conjunction with the project Zone 1 developer will work with the City of Brisbane in support of the new roadway, as appropriate. It should be noted, however, that this new facility would not be required specifically for the proposed Visitacion Valley redevelopment program, but rather would be needed to accommodate anticipated cumulative development in the southeast San Francisco/north Brisbane/east Daly City area.

LR 7.03 (Seeman) Transportation and Circulation--roadway system analysis scope--would like to see traffic impacts on both San Bruno Avenue to Alemany and Bayshore Boulevard to Chavez studied. These are alternative routes used by neighborhood when freeway is jammed even when Arleta Avenue is backed up.

Response: Based on output from the San Francisco Transportation Authority's travel demand model, the travel characteristics of existing residents in the area, and anticipated future land use patterns, it was

projected that the majority of the vehicles generated by the Visitacion Valley project would utilize Bayshore Boulevard north, U.S. 101 and, to a lesser extent (only a small portion of project-generated trips), Third Street, to travel to and from locations to the north of the project site. In general, project-related traffic tends to disperse at further distances from the site, as there are a multitude of possible roadways for vehicles to use to reach their ultimate destination. Overall, it was anticipated that the 12 "study" intersections, two freeway sections, and four freeway onramps selected for analysis in the DEIR are those most likely to be affected by the proposed project (redevelopment program)--i.e., represent the locations that would experience the highest percentage of project trips. At other locations further afield, the effects of the project would be less.

LR 7.04 (Seeman) Transportation and Circulation--transit--in order to encourage ridership, public transportation needs to become much faster; T-line should have either an express service or make fewer stops, maybe by running on even and odd alternating routes; free passes for Schlage site residences and more express bus lines are worth trying.

Response: As part of their ongoing Transit Effectiveness Project (TEP), the San Francisco Municipal Transit Agency (SFMTA) is reviewing the operations of all transit service throughout San Francisco and making recommendations for near-term service and operations improvements. The main goal of this effort is to enhance the operational efficiency of all lines, and to focus major service on a select number of major corridors like the T-Third light rail line. Throughout this effort, SFMTA will consider all means to improve service, including ideas such as express service, reducing stops, and alternating routes.

Prior to implementation of any of these added service measures, a detailed study would need to be done to evaluate the potential benefits of introducing such service, and what specific operational changes would be warranted (the T-Third Street is currently interlined with the K-Ingleside). Such an analysis should also need to include consideration of the potential loss or reduction in service to certain stops that would impact passengers currently using the line.

It should also be noted that quick access to Downtown is currently provided by the Muni 9BX (San Bruno Express) line, which begins and ends its "local" service portion at the Bayshore Boulevard/Arleta Avenue stop. This line would provide new project residents with a quick downtown-bound service.

As discussed in the DEIR under Mitigation 8-1C, the Zone 1 development sponsor would be required to draft a Transportation Management Plan (TMP), involving a comprehensive set of elements aimed to reduce the travel demand generated by the project and encourage the use of alternative travel modes. One possible element of this plan would be the provision of reduced-fee transit passes to Zone 1 residents.

LR 7.05 (Seeman) Air Quality--idling engine emissions--increase in idling engines on residential streets a concern (esp. for children with asthma); although geography limits

alternative route possibilities, need to look at stronger measures to mitigate inevitable problems given all of the anticipated development coming our way.

Response: The DEIR discusses problem pollutants and their general health effects on DEIR pages 9-3 to 9-7.

Carbon monoxide, which is a localized pollutant, was analyzed using available air quality models and compared to state and federal ambient air quality standards. Impacts were found to be less than significant (see DEIR section 9.9.3, page 9-20).

Other problem air pollutants are ozone and particulate matter. Both of these pollutants have been shown to be correlated with adverse heath effects. The Bay Area Air Quality Management District, like other air districts across the state, have recommended that project impact significance not be based on a specific change in projected concentration, but be based on a mass emission. This analysis and effect are discussed under Impact 9-2 of the DEIR; the discussion concludes that the project would have a significant impact for both ozone and PM_{10}.

Mitigation Measure 9-2 addresses the reduction of these vehicular emissions generated by the project.

LR 7.06 (Seeman) Transportation and Circulation/Air Quality-- with and without Candlestick and Baylands projects requested--would like to see analysis of comparative southwest City sector traffic an air impacts (including Visitacion Valley) with and without the proposed regional serving retail in Candlestick and Baylands developments.

Response: Each major development project in San Francisco is required to prepare a transportation assessment that evaluates the transportation impacts specific to that project. Detailed assessments of transportation/ circulation and air quality conditions associated with various components of the Bayview Waterfront (including Candlestick) and Baylands projects are included within the scope of their environmental impact reports, which are currently in process.

LR 7.07 (Seeman) Transportation and Circulation--mitigation--given identified traffic impacts, further discussion on density needed, including possible compromise with developer.

Response: The comment is noted; however, the Zone 1 density level described in the Design for Development and analyzed in the DEIR was carefully formulated by the Planning Department and Redevelopment Agency following an extensive community workshop and Visitacion Valley CAC process. Nevertheless, the Planning Department and Redevelopment Department are not precluded from proposing a reduced development intensity for Zone 1. In that light, the Alternatives chapter of the DEIR (chapter 17) includes a description and summary evaluation of the environmental implications, including traffic, of "Alternative 2: Reduced Housing Development in Zone 1" (see DEIR pages 17-2, 17-6, 17-7 through

17-9, and 17-12 through 17-14). Alternative 2 includes 735 residential units, 850 fewer than what is proposed in the Design for Development (1,585 units).

LR 8

FMa6764860@aol.com
07/21/2008 03:22 PM

To Tom.Evans@sfgov.org
cc
bcc
Subject Vis Valley EIR comments

History: This message has been forwarded.

Tom Evans
Lead Planner
San Francisco Redevelopment Agency
1 South Van Ness
San Francisco, CA 94103

July 21, 2008

RE: Visitacion Valley Draft Environmental Impact Report

Dear Tom,

Obviously, the enormous traffic impacts generated by the proposed development in the Visitacion Valley Redevelopment Area, particularly along Bayshore Boulevard, dominate the draft EIR. It would be of interest to have a further study about the impacts and possible mitigation measures for the surrounding streets that connect to Bayshore, such as Arleta, Raymond, Leland, Visitacion, Rutland, San Bruno, etc. Already traffic is backed up on some of these streets at morning rush hour for several blocks. LR 8.01

Also, lately there has been discussion about situating a grocery store on the corner of Leland and Bayshore in the new Schlage Lock development. I realize that this is purely conjecture at this stage, but there are concerns that a grocery store at that corner rather than the historically preferred southern site at Sunnydale Avenue would be problematic in terms of traffic, queuing and parking to say nothing of aesthetics, particularly, at the entry to the new development and adjacent to the "Central Park". It would be beneficial to have a traffic analysis of these 2 alternatives to determine, at least in terms of traffic, the better location for the grocery store. Given the congestion anticipated along Bayshore, it would seem preferable to draw traffic away from the most crowded intersections. LR 8.02

I will reiterate what I said at the Planning Commission meeting that, given the negative traffic impacts along Bayshore Boulevard with the Schlage Lock development and the anticipated developments at Bayview/Hunters Point, Candlestick Park, Brisbane Baylands and Daly City that the Geneva Extension must be built as soon as possible to alleviate some of the traffic impacts on our already congested roadways. Land use and transportation go hand in hand. The aforementioned areas cannot absorb the land use changes proposed without proper transportation infrastructure. LR 8.03

Furthermore, while promoting a policy of "Transit First", the City still proposes to eliminate the 56 Rutland bus line, which would connect the new development at Executive Park and surrounding Visitacion Valley neighborhood to Schlage Lock. Consequently, there will be more traffic generated by those who will be forced to drive to the new shopping opportunities at Schlage Lock. What will be the impact of not having the 56 not in service - not under existing conditions, but projected into the future when development has taken place? LR 8.04 Also, San Francisco's plan to build regional serving retail and an entertainment center at Candlestick Park does not support a "Transit First" policy and should be considered as a negative impact in the EIR. LR 8.05

The strong west to east winds are problematic in the Valley in terms of public "comfort". I know that the winds cannot be stopped, but it would be beneficial to find a means to design the site so that the wind force could be mitigated in some way. LR 8.06

Finally, on page 3-21 under "*Public Open Space* , Facilitate community efforts to extend the Leland-McLaren Park greenway through the Concept Plan Sub-area (Zone 1) to the Caltrain Station." SHOULD READ: **Facilitate the Visitacion Valley Greenway Project's efforts to extend the Visitacion Valley Greenway from Leland-McLaren Park through the Concept Plan Sub-area (Zone 1) to the Caltrain Station."** LR 8.07

I have strayed somewhat from a proper adherence to facts and not opinion in terms of my response to the EIR, but I want to be on record with some of my concerns. In most other neighborhoods, the proposed traffic impacts would be intolerable, but there are other public benefits to be weighed, such as neighborhood serving retail that we have long awaited. I would hope that there would be a meaningful continuing dialogue with our community to assure that all measures will be taken to insure the best possible outcome for our neighborhood.

I look forward to working with you to revitalize and beautify our neighborhood.
Thank you.

Fran Martin
186 Arleta Avenue
San Francisco. CA 94134

****

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LR 8.01 (Martin)

Transportation and Circulation--further study of local streets needed--further study of impacts and mitigation measures for surrounding streets that connect to Bayshore (e.g., Arleta, Raymond, Leland, Visitacion, Rutland, San Bruno, etc.)--traffic is already backed up on some of these streets for several blocks at morning rush hour

Response: The project Design for Development would create "new" westbound approaches at the intersections of Bayshore Boulevard with Leland, Visitacion and Sunnydale Avenues. While some Zone 1-generated trips would proceed through these intersections into the existing Visitacion Valley neighborhood, given the typical travel patterns during the AM and PM peak periods, most of these Zone 1 trips are expected to turn right or left onto Bayshore Boulevard. As discussed in DEIR section 8.1.1(d) on DEIR page 8-9, the eastbound approaches at these east/west cross-streets can experience queued conditions during peak commute periods. The project would likely contribute to some minor queuing on the eastbound approaches at these intersections, which was accounted for in the traffic analysis.

LR 8.02 (Martin)

Transportation and Circulation/Visual Factors--alternative grocery store locations--would be beneficial to analyze traffic implications of two possible alternative grocery store locations: location at corner of Leland/Bayshore in Schlage Lock development rather than historically preferred southern site at Sunnydale Ave. would be problematic in terms of traffic, queuing, parking and aesthetics, particularly at the entry to the new development and adjacent to the "Central Pak"; would be beneficial to have traffic analysis of these two alternative locations to determine, at least in terms of traffic, the better location for the grocery store. Given anticipated congestion along Bayshore, would seem preferable to draw traffic away from most crowded intersections.

Response: As indicated on DEIR page 3-37, the DEIR growth projections for Zone 1 under the proposed Redevelopment Plan and Design for Development assume that "a new 50,000-square-foot grocery store with housing above would be developed at the northeast corner of Bayshore Boulevard and Sunnydale Avenue.

The trip generation, origin/destination patterns, and modal split of the project's proposed grocery store would be minimally affected by its location within the development. Shifting the location of the grocery store to a location near the Central Park or closer to the intersection of Bayshore/Leland would result in grocery-related trips to utilize different project driveways. However, since this change would also necessitate a corresponding shift in location of other project elements (e.g., relocating additional residential units to the former grocery store site), the overall impact to project traffic volumes at the study intersections would be minimal.

LR 8.03 (Martin)

Transportation and Circulation--need for Geneva Extension--reiterating comments to Planning Commission, given project plus cumulative (anticipated Schlage Lock, Bayview/Hunters' Point, Candlestick, Brisbane Baylands, and Daly City), Geneva Extension must be built as soon as possible; land use and transportation go hand-in-hand; these areas cannot

absorb the land use changes proposed without proper transportation infrastructure.

Response: The proposed Geneva Avenue Extension is being analyzed in whole as part of an on-going Brisbane Baylands Specific Plan Phase 1 and 2 planning and environmental review process currently being conducted by the City of Brisbane. The extension and interchange prioritization and interjurisdictional "fair share" funding responsibilities are also being evaluated in the Bi-County Transportation Study context of overall cumulative roadway and transit system improvement needs in the area (see response to comment LR 11.06). These two analyses will assist in the determination of the configuration of the extension and other regional roadway improvements (such as the new Geneva Avenue/Harney Way interchange with U.S. 101) and what portion of the design and construction costs are attributable to the various development proposals throughout the vicinity.

LR 8.04 (Martin) Transportation and Circulation--transit--"Transit First" policy--impact of eliminating 56 Rutland Muni bus line--City proposes to eliminate 56 Rutland bus line, which would connect new development at Executive Park and surrounding Vis Valley neighborhood to Schlage Lock; this will result in more traffic generated by those forced to drive to new shopping opportunities at Schlage Lock. What will be impact of not having 56 line under project future cumulative development scenario?

Response: The 56-Rutland bus line currently operates with 30 minute headways between 7:00 and 9:00 PM, and has relatively low ridership. MTA staff has reviewed the first set of Muni's ongoing Transit Effectiveness Project (TEP--operational review) recommendations and recommended that the 56-Rutland line be retained in a shortened route (i.e., eliminating coverage east of Bayshore Boulevard to Little Hollywood and Executive Park) using "van"-like shuttles. Since the TEP only covers short-term improvements to Muni service and operations, it is expected that as new development occurs within the area, Muni will further review the future transit service needs in the area and make additional changes and improvements. It should be noted that Executive Park currently operates a shuttle to bring employees to BART, Caltrain and the T-Third light rail. As part of the on-going revisioning process of Executive Park, an expansion of the shuttle system to provide direct access to Visitacion Valley Redevelopment Program Zone 1 (the Schlage Lock site) is being explored.

LR 8.05 (Martin) Transportation and Circulation--transit--"Transit First" policy--City's plan to build region-serving retail and an entertainment center at Candlestick Park does not support "Transit First" policy and should be considered as a negative impact in the EIR.

Response: The potential regional retail and entertainment center development at Bayview Waterfront (including Candlestick Park) is not related to the proposed Visitacion Valley Redevelopment Program, and is undergoing its own environmental review process. However, it should be noted that the Bayview Waterfront Project (including the Candlestick Point and Hunters Point Shipyard developments) would likely involve substantial

changes to transit service in the area in order to accommodate that increase in residents. Possible transit service improvements associated with that development that are currently being considered include a Downtown Express service connecting the development with Downtown and a new BRT service on Harney Way, connecting the proposed retail and entertainment center to the Balboa Park BART/Muni Metro station (currently, this is envisioned as an additional extension of the TEP-proposed 28L extension east to Balboa Park BART and Mission Street).

LR 8.06 (Martin)

Air Quality--wind--strong west to east winds are problematic in the Valley; would be beneficial to find a means to design site so that wind force could be mitigated in some way.

Response: The windy nature of the site is noted on page 9-2 of the DEIR. The initial study for the proposed project noted that while wind evaluations are required in certain areas of the city, the Project Area is not within these areas. The initial study concluded that the project would result in the development of many new buildings, but none of the proposed structures would be tall enough to create a significant impact on ground level comfort conditions.

LR 8.07 (Martin)

Project Description--"Public Open Space" section on DEIR page 3-21--edit suggested: current statement "Facilitate community efforts to extend the Leland-McLaren Park greenway through the Concept Plan Sub-area (Zone 1) to the Caltrain Station" should read "Facilitate the Visitacion Valley Greenway Project's efforts to extend the Visitacion Valley Greenway from Leland-McLaren Park through the Concept Plan Sub-area (Zone 1) to the Caltrain station."

Response: The "Public Open Space" language cited in this comment on DEIR page 3-21 was correctly quoted from Table VI-4 on page VI-10 of the January 9, 2008 Visitacion Valley Redevelopment Plan Adoption Preliminary Report. The language revisions suggested in this comment have been incorporated by the Redevelopment Agency and City in finalizing the Redevelopment Plan documents and the Design for Development. See corresponding revision to DEIR page 3-21 in section 3 (Revisions to the Draft EIR) which incorporates this suggested change.

SFMTA | Municipal Transportation Agency

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BY

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Jerry Lee | Director
Bruce Oka | Director
Nathaniel P. Ford, Sr. | Executive Director/CEO

MEMORANDUM

TO: Thomas Evans, S.F. Redevelopment Agency
Community & Economic Development

FROM: Sam Fielding
Rana Ahmadi

THROUGH: Jerry Robbins JR

SUBJECT: Comments on the Visitacion Valley Redevelopment Program Draft EIR, Transportation and Circulation Section

DATE: July 21, 2008

We have reviewed the report entitled: "Visitacion Valley Redevelopment Program Draft Environmental Impact Report," dated June 3, 2008 prepared by the San Francisco Redevelopment Agency and the San Francisco Planning Department and have the following comments:

As noted in the DEIR, the proposed mitigations for this project will not significantly improve the transportation impacts, including traffic, transit, and bicycle circulation for the existing plus project and cumulative (year 2025) conditions. According to the report, the impact of the project on the existing plus project intersection level of service conditions will be significant at the following intersections:

- Bayshore Boulevard/Blanken Avenue
- Bayshore Boulevard/Arleta Avenue/San Bruno Avenue
- Bayshore Boulevard/Leland Avenue
- Bayshore Boulevard/Visitacion Avenue
- Bayshore Boulevard/Sunnydale Avenue
- Blanken Avenue/Tunnel Avenue

The project impact on the 2025 cumulative intersection level of service conditions would be significant at the following intersections:

- Blanken Avenue/Tunnel Avenue
- Bayshore Boulevard/Blanken Avenue
- Bayshore Boulevard/Arleta Avenue/San Bruno Avenue
- Bayshore Boulevard/Leland Avenue
- Bayshore Boulevard/Visitacion Avenue
- Bayshore Boulevard/Sunnydale Avenue
- Alana Way/Beatty Avenue
- Harney Way/Alana Way

The significant negative traffic impacts identified at these intersections due to the proposed project will delay transit circulation on Bayshore Boulevard and would therefore create significant impact on transit operations.

Regarding the proposed mitigation measures for the intersection of Bayshore Boulevard/Blanken Avenue and Blanken Avenue/Tunnel Avenue we have the following request:

Bayshore Boulevard/Blanken Avenue

Please provide MTA with the results of a turning movement template analysis for the Bayshore Boulevard/Blanken Avenue intersection with the proposed westbound left turn pocket on Blanken Avenue at Bayshore Boulevard. Analysis should include all turning movements into and exiting Blanken Avenue at Bayshore Boulevard to determine the proposed geometry of the left turn pocket. **LR 9.01**

Blanken Avenue/Tunnel Avenue

The proposed mitigation measure is to convert the existing all-way STOP intersection to a signalized intersection at this location. Please provide a level of service (LOS) and queuing analysis for the proposed mitigation measure to convert the existing all-way STOP to a signalized intersection. We would like to see a model of how this signal operates at this intersection and if it will be coordinated with the existing signal at Bayshore Boulevard/Blanken Avenue. What will be the signal cycle lengths for each intersection? What is the LOS with the proposed signal at Blanken Avenue/Tunnel Avenue? Will there be vehicle queuing between a signalized Blanken Avenue/Tunnel Avenue and Bayshore Boulevard/Blanken Avenue? **LR 9.02**

Ancillary Funds for Transportation and Traffic Improvements

As mitigation for the anticipated increased transit use on the Bayshore Boulevard corridor as a result of the proposed project, Visitacion Vally project development funds should be specifically identified for contribution to the construction of the T-Third Metro Streetcar line planned extension from the existing final stop at Bayshore/Sunnydale to the Caltrain Bayshore Station. **LR 9.03**

In addition, the project should assume responsibility to contribute its fair-share to the funding of the bi-county transportation projects being currently studied by the Transportation Authority. The funding mechanism for these improvements has not been finalized. The fair-share contribution would be based on the degree of impacts created by all proposed projects in the area and other source of available funding. These improvements including the Geneva Avenue extension are noted in the DEIR. **LR 9.04**

The project should ensure that additional funds from the Visitacion Valley Community Facilities and Infrastructure Fee, identified in Section 319.1 of the Planning Code, are identified and allocated for pedestrian and streetscape improvements, as noted in the DEIR. **LR 9.05**

LR 9.01 (MTA)

Transportation and Circulation--proposed intersection mitigations--Bayshore Boulevard/Blanken Avenue intersection--analysis data requested for MTA review--provide results of turning movement template analysis with proposed westbound left turn pocket on Blanken Avenue at Bayshore; analysis should include all turning movements into and exiting Blanken at Bayshore to determine geometry of proposed left turn pocket.

Response: To address the concerns raised by MTA, a truck turning analysis was conducted by the EIR transportation consultant for vehicles making the northbound right-turn from Bayshore Boulevard to Blanken Avenue with the proposed restriping of the westbound approach to provide an additional turn pocket. Diagrams depicting the results of this truck turning movement analysis are included in Appendix 4.5, Supplemental Transportation Analysis Information, of this Final EIR document.

Based on this evaluation, it was determined that trucks longer than 45-feet could not make the northbound right turn at this intersection from the rightmost through lane, but would be able to do so from the left through lane. Although this movement could result in minor conflicts between these longer trucks and regular street traffic, it would not negate the effectiveness of the proposed mitigation measure.

LR 9.02 (MTA)

Transportation and Circulation--proposed intersection mitigations--Blanken Avenue/Tunnel Avenue intersection--analysis data requested for MTA review--provide level of service (LOS) and queuing analysis for proposed conversion of intersection from all-way stop (existing) to signalized. Model of how this signal operates requested. Will it be coordinated with existing signal at Bayshore/Blanken? What will signal cycle lengths be for each intersection? What is LOS with proposed signal at Blanken/Tunnel? Will there be vehicle queuing between signalized Blanken/Tunnel and Bayshore/Blanken intersections?

Response: A proposed lane configuration and signal timing plan for this intersection, both with and without the anticipated regional transportation improvements, has been developed by the EIR transportation consultant in response to this comment. The proposed lane configuration diagram and associated signal timing plan is included in Appendix 4.5, Supplemental Transportation Analysis Information, of this Final EIR document.

Because of the large difference in travel patterns as a result of the anticipated regional transportation improvements, particularly, the Geneva Extension and the new Harney Way/U.S. 101 Interchange, a slightly different timing/phasing plan and lane configuration were assumed in the DEIR for 2025 Cumulative with Regional Transportation Improvements scenario.

On-street parking would be removed on all approaches, and each approach would be restriped to accommodate two lanes approaching the intersection and one receiving lane leaving the intersection. The signal would be actuated-coordinated and would operate on a 110-second cycle, consistent with the adjacent intersections at Bayshore Boulevard/Tunnel Avenue and

Bayshore Boulevard/Blanken Avenue. The coordinated movements would be the eastbound right and northbound left and through movements, which would occur concurrently. All other lanes/movements would be actuated with no recall.

The intersection would be offset so as to maximize the coordination from the northbound left at Tunnel Avenue/Blanken Avenue to the westbound left at Bayshore Boulevard/Blanken Avenue and from the northbound right at Bayshore Boulevard/Blanken Avenue to the eastbound right at Tunnel Avenue/Blanken Avenue. This also ensures that queuing on the eastbound approach at Tunnel Avenue/Blanken Avenue is kept to a minimum and does not extend into Bayshore Boulevard/Blanken Avenue.

Peak Hour	Existing plus Project Conditions		Cumulative Conditions			
			Without Transp. Improvements		With Transp. Improvements	
	LOS	Delay	LOS	Delay	LOS	Delay
AM Peak Hour	D	36.2	**F**	**>80.0**	C	34.1
PM Peak Hour	C	31.0	**F**	**>80.0**	D	36.1

As shown in the table above, after the proposed signalization and restriping, the intersection would operate at acceptable levels of service under Existing plus Project Conditions, but would fail in Cumulative Conditions without Transportation Improvements. However, it would operate at acceptable levels of service under the 2025 Cumulative Conditions with Regional Transportation Improvements scenario.

The queuing analysis is summarized in the table below.

Lane Group	Storage Capacity	Existing plus Project Conditions		Cumulative Conditions			
				Without Transp. Improvements		With Transp. Improvements	
		AM	PM	AM	PM	AM	PM
NBL	310'	86'	168'	**>1000'**	**878'**	47'	42'
NBTR	310'	114'	88'	**325'**	**358'**	176'	140'
SBL	230'	87'	131'	115'	218'	135'	226'
SBTR	270'	146'	83'	217'	117'	199'	46'
EBLT	200'	75'	51'	62'	136'	130'	81'
EBR	100'	23'	28'	74'	**150'**	14'	15'
WBL or WBLT	210'	21'	17'	**272'**	**248'**	129'	**219'**
WBTR or WBR	210'	155'	198'	**432'**	**370'**	51'	38'

Source: DMJM Harris, 2008.
Bold indicates a 95th percentile queue length that exceeds the available storage capacity.

As shown in the above table, after the proposed signalization and restriping, there would be sufficient storage capacity on all lane groups to handle the 95th percentile queues for the Existing Plus Project Conditions scenario. The

95th percentile queues for the 2025 Cumulative Conditions without Regional Transportation Improvements scenario would exceed the available storage capacity for several lane groups, including the northbound left lane. Under the 2025 Cumulative Conditions with Regional Transportation Improvements scenario, there would be sufficient storage capacity in all lane groups to handle the 95th percentile queues, with the exception of the westbound shared left-through lane. Given that it exceeds the storage capacity by only nine feet--i.e., less than one car-length--and 95 percent of all queues would be shorter, this is not expected to cause significant problems for side street traffic on Wheeler Avenue.

LR 9.03 (MTA)

Transportation and Circulation--transit impact mitigation--ancillary funds for transportation and traffic improvements--Visitacion Valley project development funds should be specifically identified for contribution to construction of planned T-Third Metro line from existing final stop at Bayshore/Sunnydale to Caltrain Bayshore Station.

Response: DEIR page 8-62 indicates that "the various Muni bus lines serving the Project Area currently operate at substantially less capacity during both the weekday AM and PM peak hours," and "The additional Project-generated transit trips would therefore not be expected to significantly impact peak period transit capacity." Nevertheless, there are various infrastructure funding mechanisms applicable to the Project Area that may provide funds for allocation to transit improvements. As explained previously in section 2.2.2 herein in response to comment LR 11.06, City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to all future development in Project Area Zone 1. In addition, as a condition of future development approvals in Zone 1, the Agency intends to enter into Owner Participation Agreements (OPAs) with Zone 1 developers that would establish local transportation system improvement requirements. In addition, following standard San Francisco DPW practice, establishment of a Public Improvements Agreement (PIA) will be required as a condition of future Project Area subdivision map approvals. Funds collected through these mechanisms may be used to improve traffic, transit, pedestrian, and bicycle circulation in the area. One specific improvement project for which these funds may be used is the potential extension of the T-Third light rail line; however, at this time, the full list of improvement projects has not been identified.

LR 9.04 (MTA)

Transportation and Circulation--mitigation funding--bi-county transportation projects--project should assume responsibility to contribute its fair-share to funding of bi-county transportation projects currently being studied by MTA. Funding mechanism for these improvements has not been finalized. Fair-share contribution would be based on degree of impacts created by all proposed projects in area and other sources of available funding. These improvements, including Geneva Extension, are noted in the DEIR.

Response: Comment noted. The Redevelopment Agency and Planning Department, in concurrence with the Zone 1 development sponsor, are committed to contributing the appropriate fair share to the regional mitigation

program. Please see response to related comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein.

LR 9.05 (MTA)

Transportation and Circulation--mitigation funding--pedestrian and streetscape improvements--project should ensure that additional funds from Visitacion Valley Community Facilities and Infrastructure Fee (identified in Planning Code section 319.1) are identified and allocated for pedestrian and streetscape improvements, as noted in the DEIR.

Response: Comment noted. The fees collected pursuant to Planning Code section 319 will be used for the purposes outlined in the ordinance. This measure is included in the EIR-related Mitigation Monitoring and Reporting Plan (MMRP) that has been formulated by the Redevelopment Agency and Planning Department.

LR 10

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JMBM | Jeffer Mangels Butler & Marmaro LLP

David P. Cincotta
Direct: (415) 984-9687
Fax: (800) 365-1372
DCincotta@jmbm.com

Two Embarcadero Center, 5th Floor
San Francisco, California 94111-3824
(415) 398-8080 (415) 398-5584 Fax
www.jmbm.com

July 21, 2008

Tom Evans, Lead Planner
San Francisco Redevelopment Agency
1 South Van Ness Avenue, Fifth Floor
San Francisco, California 94103

Re: Comments on Draft Environmental Impact Report for Visitacion Valley Redevelopment Program

Dear Mr. Evans:

On behalf of Universal Paragon Corporation ("UPC"), we have prepared the following comments on the Draft Environmental Impact Report ("DEIR"). We believe the comments are self-explanatory but if you have any questions regarding the comments or the concerns of UPC in the DEIR then please do not hesitate to contact us. We have organized the comments by category as they are presented in the DEIR.

Chapter 9. Air Quality

On page 9-25, the DEIR states that "there are currently no published thresholds of significance for measuring the impact of global climate change...". While technically this is correct new Guidelines for California Environmental Quality Act ("CEQA") review were published by the State of California's Office of Policy and Research on June 19. 2008. Please confirm that the analysis contained in the DEIR is consistent with these latest guidelines. LR 10.01

Chapter 10. Cultural and Historic Resources

On pages 10-20 and 10-21, there is a discussion of the categories of significant resources -specifically Category A and Category B resources from the San Francisco Preservation Bulletin 16. While it states clearly that there are no Category A resources, it then lists several "Contributors" on page 10-21.It is unclear to which category these resources belong as some of them are listed as Category B resources earlier and others are not referenced at all previously. Please clarify. LR 10.02

Mitigation Measure 10-1 identifies measures, such as Salvage, Commemoration and Contribution to a Historic Preservation Fund (page 10-25), which do not mitigate any significant environmental impact. In fact, the Contribution is only suggested on a case-by-case LR 10.03

basis when other measures to reduce the significance of an impact cannot be implemented. As a result, it appears that such measures may be more appropriately designated as Improvement Measures instead of Mitigation Measures. It is also unclear as to the duty to address such measures as there are references throughout this chapter to both the Project Sponsor, which is the San Francisco Redevelopment Agency ("SFRA") and individual project applicants. Please clarify. LR 10.04

Mitigation Measure 10-2 requires the Project Sponsor to retain the services of a qualified archaeological consultant to perform certain reports, testing and monitoring.. It is unclear as to when the SFRA will hire such consultant and when the required reports will be completed. To prevent delays in the remediation activities, may we suggest that such measures occur as soon as possible and further this requirement should be clarified as to when the other testing and monitoring activities will be performed. LR 10.05

Chapter 12. Hydrology and Water Quality

The DEIR identifies a potentially significant water quality impact [Impact12-1] due to increased storm water runoff. However, on page 12-12, the DEIR actually states that the proposed project and design features described in the Design for Development actually **reduces** the runoff coefficient from 0.88 to 0.83 an approximately 9% reduction from the existing condition. LR 10.06

Furthermore, Mitigation Measure 12-1 requires retention storage facilities and other pervious surfaces as compliance with **hypothetical** anticipated regulations from the San Francisco Public Utilities Commission ("SFPUC") in order to achieve at least 80% total annual runoff. It also requires a minimum of 25% of the surface to be pervious and this requirement is based on only an example "for illustrative purposes only" See Footnote 2 on Page 12-13. These measures are included to mitigate an impact that is **not** clearly demonstrated – in fact, the contrary is indicated – to comply with regulations that have not been adopted. This is highly speculative and inappropriate to include in the DEIR. Moreover, due to the contamination condition at the Zone 1 site, the remediation program that has been approved by the remediation insurance carrier and is being prepared in consultation with the Department of Toxic Substance Control ("DTSC") will not permit water retention facilities, if such facilities require significant changes in the existing grading plan and excavation program. [It should be noted that the guidelines cited in Footnote 4 on Page12-13, were not prepared for a brownfield site such as the Zone 1 site.] This mitigation measure should be eliminated. If the SFRA would like to consider goals and objectives for other sustainable improvement measures, there are other more appropriate documents that could address these improvement measures, and they should be appropriately described as goals and not required mitigation measures. LR 10.07 LR 10.08

UPC is prepared to consider sustainable design features, such as retention and detention facilities and pervious surfaces in its development as may be possible and are consistent with the existing contaminated conditions on the site and the approved remediation LR 10.09

plan that is ultimately approved by DTSC. However, it is totally inappropriate to include such a speculative mitigation measure for an impact that is not clearly demonstrated.

LR 10.10

Chapter 17. Alternatives to the Proposed Project

UPC is requesting that the Draft Environmental Impact Report be expanded to include a new alternative – an Increased Housing Alternative in Redevelopment Zone 1.

As you know, UPC just recently acquired the Ingersoll Rand/Schlage Lock site and combined it with its own property. Since that acquisition, we have begun to assemble development costs and prepare *pro formas* for the potential development. Our preliminary estimates suggest that a higher density may be required in order to make the project financially feasible. UPC has not made any final determinations in the potential size of its development and can not do so without considerable study with the SFRA about other costs, such as infrastructure costs, costs to create affordable housing, and other sustainable design feature costs. So, UPC is not asking that the Proposed Project be modified. However, in order to allow for a range of alternative developments to be considered over the next year while we are negotiating an Owner Participation Agreement, we believe an increased housing alternative should be studied for its potential environmental impacts. The increased housing alternative proposed is as follows and we have put it in the format of Table 17.1 of the DEIR:

	Residential units	Retail (S.F.)	Other Commercial (S.F.)[1]	Cultural/Instit./ Educ. (S.F.)[2]
Proposed Project	1,585	131,500	(39,377)	25,000
Alternative:				
7. Increased Housing in Redevelopment Zone 1	1,848	143,500	(39,377)	25,000

[1] "Other Commercial" includes medical/dental offices; offices; and production, distribution, and repair uses (including auto-related).

[2] "Cultural/Institutional/Educational" includes community centers and libraries.

This proposal actually increases the proposed project only slightly by increasing the residential units on Zone 1 to approximately 1513 dwelling units from 1250 dwelling units; increasing the retail commercial square footage to 117,000 from 105,000 square feet with no other changes to other commercial square footage and the cultural, institutional and educational square footage. As this DEIR is also intended to serve as a project EIR for the proposed development of Zone 1 we believe the DEIR should be able to adequately analyze this slight increase in a possible alternative..

Sincerely,

DAVID P. CINCOTTA, Of Counsel to
Jeffer, Mangels, Butler & Marmaro LLP

cc: Denn Hu
Steven Hanson
Jonathan Scharfman

LR 10.01 (Cincotta)

Air Quality--greenhouse gases impacts--DEIR consistency with latest CEQA Guidelines on global climate change--DEIR page 9-25 states that "there are currently no published thresholds of significance for measuring the impact of global climate change..." Please confirm that DEIR global climate change analysis is consistent with new Guidelines for CEQA published by OPR on June 19, 2008.

Response: The DEIR includes an evaluation of project greenhouse gas (GHG) emission and climate change impacts which is consistent with CEQA and other related state regulatory provisions and guidelines in effect at the time the Notice of Preparation for this EIR was published (the Notice of Preparation of a Draft EIR for the Visitacion Valley Redevelopment Program was published and distributed on January 31, 2007). The discussion of Project GHG emission and global climate change impacts presented on DEIR page 9-6 through 9-8 [subsection (j), Greenhouse Gases and Global Climate Change], 9-13 through 9-14 (section 9.2.3, Statewide Actions, and section 9.24, Local Actions), and 9-25 through 9-27 (Greenhouse Gases Impacts), is fully consistent with state requirements and normal CEQA practice on GHG and global climate change impact assessment as of January 31, 2007. In particular, the DEIR discussion identifies, and is responsive to, the Governor's Executive Order S-3-05 statement of GHG emissions reduction target dates, and Assembly Bill 32, the California Global Warming Solutions Act of 2006. The DEIR discussion includes reference to the list of GHG reduction measures compiled by the State Attorney Generals Office as of March 1, 2008.

Since January 31, 2007, state Senate Bill 97 was enacted to amend the CEQA statute to clearly establish that the effects of GHG emissions are an appropriate subject for CEQA analysis and directed OPR to develop guidelines by July 1, 2009, for State Resources Agency adoption by January 1, 2010, "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." Also subsequent to publication of the January 31, 2007 NOP, OPR released a June 2008 CEQA and Climate Change Technical Advisory[1] that provides additional interim "informal guidance" regarding the steps lead agencies should take to address climate change in their CEQA documents.

The Advisory indicates that lead agencies should determine whether greenhouse gases may be generated by a proposed project, and if so, quantify or estimate the GHG emissions by type and source. Second, the Advisory indicates that lead agency must assess whether those emissions are individually or cumulatively significant. When assessing whether a project's effects on climate change are "cumulatively considerable" even though its GHG contribution may be individually limited, the Advisory

[1]California Governor's Office of Planning and Research, *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*; June 19, 2008. (CEQA Climate Change Technical Advisory, June 2008)

indicates that the lead agency must consider the impact of the project when viewed in connection with the effects of past, current, and probable future projects. Finally, if the lead agency determines that the GHG emissions from the project as proposed are potentially significant, the Advisory indicates that it must identify and implement measures to avoid, reduce, or otherwise mitigate the impacts of those emissions.[1]

Also, in response to SB 97 and the June 2008 CEQA Advisory, San Francisco has taken the following additional climate change related actions since publication of the January 2007 DEIR:

(1) The City has issued a November 2008 update to its Standard CEQA Climate Change language describing these new statewide actions and the associated new City climate change control actions listed below;

(2) The City has adopted a new Greenhouse Gas Reduction Ordinance (May 2008) amending the San Francisco Environmental Code to establish City greenhouse gas emissions 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.

(3) On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched their "GoSolarSF" program for 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.

(4) On August 4, 2008, Mayor Gavin Newsom signed into law San Francisco's Green Building Ordinance for newly constructed residential and

[1]State of California, Governor's Office of Planning and Research, *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review* (CEQA TA), June 19, 2008; page 1

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.

These new City requirements will apply to future Project Area development.

Although the GHG impact discussion on page 9-25 of the DEIR was prepared and published prior to the availability of OPR's June 2008 "CEQA and Climate Change" Technical Advisory and the latest San Francisco climate change control actions listed above, the DEIR language is generally consistent with the June 2008 CEQA Advisory--i.e., the DEIR discussion includes quantification of project-related GHG emissions resulting from the project-facilitated net development increase in Zones 1 and 2 in appropriate carbon dioxide equivalents (the "common practice" GHG emissions quantification unit) not including anticipated project GHG reduction measures incorporated into the proposed Zone 1 development (LEED provisions, etc.), as well as quantification of estimated project-related GHG emissions from project-related off-site electricity generation and solid waste disposal, and discusses these quantified totals in the context of cumulative regional and global GHG increases. The DEIR discussion also concludes that the project incorporates many of the GHG emissions reduction measures identified by the State Attorney General's Office as of March 2008 (infill development, good transit access, urban landscaping, energy efficiency standards, construction demolition debris recovery, etc.). The discussion ultimately concludes, based on a full discussion of such evidence, that the proposed Project would not emit a substantial (significant) amount of GHG emissions nor contribute significantly to global climate change.

LR 10.02 (Cincotta) Cultural and Historic Resources--categories of significant resources--DEIR lists several "contributors" on page 10-21, but not clear regarding to which categories of significant resources, Category A or B from SF Preservation Bulletin 16, these resources (contributors) belong; please clarify.

Response: The text on DEIR page 10-20 clearly states that there are no Category A structures in the Project Area. Moreover, all contributors described on DEIR page 10-21 are Category B structures. Schlage Building A (the Old Office Building) was identified in the 1976 Architectural Survey, while all other contributors are over 50 years of age and proposed for demolition. (See page 6 of SF Preservation Bulletin 16 -- "Properties More than 50 Years Old Proposed for Demolition or Major Alteration" fall into Category B.).

LR 10.03 (Cincotta) Cultural and Historic Resources--mitigation--some identified "mitigations" may be more appropriately labeled "improvements"--Mitigation 10-1 (DEIR page 10-25) identifies measures (salvage, commemoration, contribution to historic preservation fund) which it acknowledges do not mitigate any significant impact; such measures may be more appropriately designated as Improvement Measures instead of Mitigation Measures.

Response: The EIR historic resources consultants regularly include mitigation measures that, if implemented, reduce this impact, but do not fully mitigate the impact of a demolition to a level of less than significance. Such CEQA-related mitigation measures are not commonly referred to as "improvement measures" in CEQA documents, as suggested. There is no CEQA provision that suggests such measures are not "mitigation."

LR 10.04 (Cincotta) Cultural and Historical Resources--mitigation--mitigation responsibility needs clarification--request for clarification regarding which mitigation measures are Redevelopment Agency responsibility and which are individual developer responsibility.

Response: The Redevelopment Agency and Planning Department are proposing the plan for which this EIR was prepared. As such the mitigation measures are addressed to the Redevelopment Agency and Planning Department. However, since there is a developer for the Schlage Lock already on board, it is assumed that the Redevelopment Agency and Planning Department will require the developer to implement such measures as a condition of approval for any future development activity, including demolition permits.

The Mitigation Monitoring and Reporting Plan clarifies the relative responsibilities of the SFRA and project developer in the implementation of the requirements of the archaeological mitigation measures.

As a side note, UPC has already issued a Request for Proposal (RFP) and selected a consultant to prepare a scope of services to implement the DEIR-required historic resource mitigation measures (archaeology is not mentioned in the RFP).

LR 10.05 (Cincotta) Cultural and Historical Resources--mitigation--Mitigation 10-2--clarifications regarding responsibility and timing requested--mitigation requires project sponsor to retain services of a qualified consultant to perform certain reports, testing and monitoring; "unclear as to when SFRA will hire such a consultant and when required reports will be completed; suggest that such measures be done as soon as possible to prevent delays; request clarification as to when other testing and monitoring will be performed."

Response: See response to LR 1.02.

LR 10.06 (Cincotta) Hydrology and Water Quality--possible DEIR inconsistency regarding runoff--under Impact 12-1, DEIR identifies potential water quality impact due to increased storm water runoff; however, DEIR page 12-12 states that project and design features in D4D would actually reduce runoff coefficient.

Response: Existing combined sewer overflows are primarily caused by excess storm water runoff that enters the system, so all properties within the Sunnydale Basin contribute to overflows that adversely affect water quality in SF Bay. As such, this effect represents an existing cumulative impact that can be addressed either globally through construction of facilities such as the Harney Way box/storage culvert, or incrementally through the creation of

retention/ detention storage on individual properties. San Francisco continues to invest in global infrastructure improvements (such as the proposed Sunnydale sewer tunnel), but in order to further reduce overflows and protect Bay water quality, emphasis is now shifting to controlling inflow to the system. In general, this can be most efficiently and effectively accomplished at the time of new development or redevelopment. Accordingly, even if the SFPUC does not adopt and implement the proposed storm water regulations outlined in the DEIR, the project should be required to mitigate its existing contribution to sewer system overflows, utilizing site design and runoff control best management practices designed to achieve specific goals identified by SFPUC and DPW. In addition, San Francisco's new Green Building Ordinance, signed into law on August 4, 2008, includes new storm water reduction targets and requirements for individual development projects.

LR 10.07 (Cincotta)

Hydrology and Water Quality--mitigation--proposed retention facility measure should be eliminated--Mitigation 12-1 calls for retention and other measures to achieve at least 80 percent total annual runoff and 25 percent of surface to be pervious--these measures are included to mitigate an impact that is not clearly demonstrated--to comply with regulations that have not been adopted--highly speculative and inappropriate to include in DEIR; also, remediation program for Zone 1 that has been approved by insurance carrier and is being prepared in consultation with DTSC will not permit water retention facilities if such facilities require significant changes in existing grading plan and excavation program; guidelines cited in footnote were not prepared for a brownfield site such as Zone 1; this mitigation should be eliminated.

Response: The cited mitigation measure was proposed not simply to comply with the SFPUC's anticipated regulatory changes, but also to bring the largest (Zone 1) portion of the redevelopment project area into compliance with existing federal requirements governing the quality of storm water runoff. These requirements are applied not only to *new* development but also to *redevelopment* projects. The mitigation measure's recommended capture and treatment of 80 percent of total annual storm water runoff prior to discharge is consistent with best management practices applied throughout the Bay Area and California to meet water quality goals.

The pervious surfaces within all building setbacks do not necessarily lead to increased groundwater infiltration, but can simply serve to slow rain water transport into the City's wastewater system. Nevertheless, the DEIR Mitigation 12-1 recommended 25 percent pervious setback requirement would serve to further protect water quality, not by providing additional treatment, but by decreasing the total volume of runoff during heavy rains. Although the SFPUC has not finalized the regulations needed to achieve this goal, this project still has the responsibility to address its expected contribution to a cumulative, City-wide direct discharge impact.

It is additionally noted that, although preliminary calculations presented in the DEIR indicated that Zone 1, as currently designed, would reduce peak storm water discharges from the project site, the project would significantly increase

existing wastewater flows. Since storm runoff and wastewater are carried by a common system, the increase in wastewater would largely offset any reductions in runoff achieved by the site's redevelopment. This projected balancing of flows highlights the need to further reduce Zone 1's total volume of storm water runoff, through measures such as the recommended 25 percent pervious setback requirement, as part of City-wide efforts to reduce direct wastewater discharges.

LR 10.08 (Cincotta) Hazards and Hazardous Materials--mitigation--other mitigation approaches are more appropriate--there are other more appropriate documents that Redevelopment Agency should consider for identification of sustainable mitigation measures, and such measures should be described as goals rather than required mitigation measures.

Response: There are many examples of best management storm water practices that have implemented on brownfield sites, including locally. In the event that retention/detention measures described in the Mitigation Measure are not appropriate for the specific conditions found in Zone 1, the project sponsors would be required to identify alternative measures that achieve equivalent levels of runoff reduction and treatment for approval by SFPUC and the Department of Public Works.

Please also see response to comment LR 1.09 in previous section 2.2.3, Land Use.

LR 10.09 (Cincotta) Hazards and Hazardous Materials--mitigation--UPC prepared to consider mitigations which are consistent with conditions and with the remediation plan ultimately approved by DTSC--other mitigation approaches more appropriate--UPC prepared to consider sustainable design features, such as retention and detention facilities and pervious surfaces in its development as may be possible and are consistent with DTSC-approved remediation plan; however, totally inappropriate for DEIR to include such a speculative mitigation measure for an impact that has not been clearly demonstrated.

Response: Please see response to comment LR 1.09 in previous section 2.2.3, Land Use.

LR 10.10 (Cincotta) Alternatives to the Proposed Action--DEIR expansion to address new increased housing and retail in Zone 1 requested--UPC is requesting that DEIR be expanded to include new alternative: Increased Housing Alternative in Redevelopment Zone 1; UPC has recently acquired Ingersoll Rand/ Schlage site; preliminary cost estimates suggest a higher density may be required in order to make project financially feasible--proposed increased housing alternative numbers: 1,848 units (versus 1,585 for proposed project) and 143,500 square feet of retail (versus 131,500 for proposed project), with no change in amount of "other commercial" eliminated and "cultural/ institutional/educational" added; proposed added alternative would increase proposed project only slightly. As DEIR is intended to serve as project EIR for Zone 1, DEIR should be able to adequately analyze this slight increase as a possible alternative.

Response: The project description that has been described and thoroughly analyzed in the DEIR, including the various land use (residential, retail, etc.) intensity totals and layout, represents the specific redevelopment program and associated Design for Development that was carefully formulated by the Planning Department and Redevelopment Agency following an extensive community workshop and Citizens Advisory Committee (CAC) process and in close consultation with the affected property owners, including Universal Paragon Corporation.

CEQA Guidelines section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, subsection (a), states that the specific purpose of, and limitation on, the consideration and discussion of alternatives to the proposed Project in a Draft EIR is to "describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the objectives of the project but would avoid or substantially lessen many of the significant effects of the project..." [underline added for emphasis]. CEQA Guidelines section 15126.6, subsections (b) and (c), repeat this concept, stating that the range of potential alternatives to the proposed project shall include those "which are capable of avoiding or substantially lessening any significant effects of the project"; and subsection (f) on the "Rule of Reason," reinforces this CEQA-intended emphasis in the alternatives discussion on reducing impacts, stating that "the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" [underline added for emphasis]. It is therefore common CEQA practice in San Francisco and elsewhere to confine the DEIR identification and evaluation of alternatives to the proposed Project to those that would result in an avoidance or lessening of key identified key impacts of concern--i.e., to "mitigating" alternatives. The widely used *CEQA Deskbook, A Step-by-Step Guide on How to Comply with The California Environmental Quality Act, Second Edition*, by Bass et al., states "the discussion of alternatives must focus on those alternatives that are capable of avoiding or substantially lessening the significant effects of the project" (page 108) and "...the alternatives must be limited to ones that substantially lessen at least one or the significant effects of the project" (page 109) [underline added for emphasis]. The added more intensive development alternative suggested in this comment does not meet this criteria.

To introduce the new alternative suggested in this comment at this time in the CEQA process--i.e., after the DEIR has undergone public review but prior to certification--that represents a more intensive development program (a 16.6 percent increase in Zone 1 residential intensity and 9.1 increase in Zone 1 retail intensity), would serve no environmental impact mitigation purpose, as explained above, and would require more detailed re-analysis of comparative key impacts including land use, visual factors, transportation and circulation, air quality, hazards, noise and public services, which would add considerable time to the CEQA process. The added, more intensive development alternative would in the opinion of the EIR authors represent a substantial change in the EIR environmental information, after public notice has been given on the availability of the Draft EIR for public review, but before

certification, that has not been subject to meaningful public comment. In the opinion of the EIR authors, this additional DEIR information would therefore require recirculation of the DEIR pursuant to CEQA Guidelines section 15088.5.

As explained in DEIR section 3.13, Intended Uses of the EIR, on DEIR page 3-41, this EIR has been prepared for use by the Board of Supervisors, Redevelopment Agency and Planning Commission in their consideration of future, individual public and private development projects proposed within the Project Area boundaries. Certification of the EIR as presently constituted does not preclude Universal Paragon from submitting a future development application which includes the development changes described in this comment. As explained in DEIR section 3.13, such a future application would be examined in the context of the baseline documentation contained in the certified EIR to determine whether additional more focused environmental documentation would be required.

LR 11

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 622-5491
FAX (510) 286-5559
TTY 711

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July 21, 2008

SF101166
SF-101-0.77
SCH#2007022049

Mr. Tom Evans
San Francisco Redevelopment Agency
1 Van Ness Avenue, 5th Floor
San Francisco, CA 94103

Dear Mr. Evans:

Visitacion Valley Redevelopment Program – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Visitacion Valley Redevelopment Program. The following comments are based on the Draft Environmental Impact Report (DEIR). As co-lead agencies, the San Francisco Redevelopment Agency and the San Francisco Planning Department are responsible for all project mitigation, including any needed improvements to State highways. The Visitacion Valley Redevelopment Program's fair share contribution, financing, scheduling, implementation responsibilities and lead agencies monitoring should be fully discussed in project-specific traffic impact studies and the DEIR. The project's Mitigation Monitoring and Reporting Plan should be included in the DEIR. Scheduling of project phases and required improvements should be clearly identified to ensure that residual impacts (those remaining after mitigation is applied) should be clearly identified. Any required roadway improvements should be completed prior to issuance of project occupancy permits. An encroachment permit is required when the project involves work in the State's right-of-way (ROW). The Department will not issue an encroachment permit until our concerns are adequately addressed. Therefore, we strongly recommend that the lead agencies ensure resolution of the Department's California Environmental Quality Act (CEQA) concerns prior to submittal of the encroachment permit application.

LR 11.01
LR 11.02
LR 11.03
LR 11.04
LR 11.05

General Plan Transportation Element

The Governor's Office of Planning and Research *2003 General Plan Guidelines* recommend estimating costs of needed improvements as well as identifying viable funding sources correlated to the pace of improvements. However, the DEIR does not refer to any General Plan policies requiring developers to offset their impacts to the transportation system by paying traffic impact fees or constructing required improvements. Policies requiring mitigation of project-related traffic impacts should be included in Section 4.1.5, *Transportation Element*, of the DEIR.

LR 11.06

LR 11

Highway Operations

Under the baseline and cumulative scenarios, 2025 was used as the benchmark year to assess future impacts. However, from Section 3.6.3 *Redevelopment Plan Parameters*, it states, "implement redevelopment actions in the Project Area for a period of 30 years from Plan adoption." For the Anticipated Time Limits outlined page 3-12, project activities would be carried out until 2038 with the assumption that the Plan will be adopted in 2008. As a result, the 2025 baseline and cumulative scenarios would not adequately reflect project impacts for developments between years 2025 to 2038. LR 11.07

Given the massive scale of cumulative new development proposed in the project vicinity, every effort should be made to ensure that traffic analysis assumptions and methodologies are consistent with other studies in the project vicinity to facilitate review by affected agencies including the City and County of San Francisco, San Mateo County, the City of Brisbane, the City/County Association of Governments of San Mateo (C/CAG) and the Metropolitan Transportation Commission (MTC). Local and regional planning agencies should coordinate traffic analysis and mitigation to the maximum extent possible, due to the level of coordination required to ensure that transportation infrastructure keeps pace with demand. Furthermore, scheduling and costs associated with planned improvements affecting State ROW as well as viable funding sources correlated to the pace of improvements should be indentified. LR 11.08 LR 11.09

On page 5-4, Table 5.1 should be expanded to include a more comprehensive representation of pending and approved projects in the vicinity of Visitacion Valley Redevelopment Area. The table should include: identification of Lead Agencies, the size/units of each project, trip generation for AM, PM and daily trips, and the anticipated timeline for implementation. LR 11.10

Is the Bayview Waterfront project different than the Candlestick Point project plus the Hunters Point Shipyard Phase 2 project? If the project characteristics are different, please include the Bayview Waterfront project in the 2007 SFCTA Model on page 8-26, Section 8.3.2 *Project Travel Demand.* LR 11.11

Please also include a list of smaller projects (pending and/or approved) within the surrounding area. LR 11.12

The initial and follow-up analysis related to the Transportation Management Plan should include data collection from nearby US-101 intersections as well as local roads. Specifically, the same type of data collection and analysis that is recommended for local roads should be applied to US-101/Bayshore Boulevard /Third Street ramps and US-101 ramps at Alana Way, Beatty Avenue and Harney Road. LR 11.13

In Section 8.1.1 *Existing Roadway Network*, page 8-11 and Section 8.3.5 *Roadway System Impacts* on pages 8-48 to 8-49, please provide analysis for off-ramps and assess the potential queues onto the freeway mainline. LR 11.14

Furthermore, the assumptions and methodology applied to the Existing, Baseline condition and Cumulative conditions model should be consistent with those applied to traffic studies for the nearby projects listed on pages 8-26 and 8-27 of the DEIR. LR 11.15

LR 11

For Mitigation 8-2, on page 8-39, where "there are no feasible mitigation measures that could be implemented to reduce the Project's LOS impacts to less than significant levels" project phases should not be approved until adequate mitigation can be developed, funded and implemented, and the project should be required to pay its fair share toward mitigating traffic-related impacts. LR 11.16

For Mitigation 8-2 and Mitigation 8-4 on pages 8-39 and 8-50 respectively, why is a mechanism for "fair share contribution" for traffic mitigation suggested for project-specific impacts to local roads, but not for impacts to US-101? LR 11.17

For Mitigation 8-4, on page 8-50, the existing pocket length (road length) on northbound Harney Way (Northbound US-101 off-ramp) at Alana Way/Thomas Mellon Drive intersection left turn to southbound Alana Way is 2,805 feet, less than the 3,900 feet required for 156 passenger cars queuing length for the "2025 Cumulative AM Conditions" scenario. Please provide additional mitigation for this impact. LR 11.18

For Mitigation 8-5 on page 8-52, while land acquisition, substantial costs and jurisdictional issues certainly complicate project mitigation, these issues are regularly resolved to implement mitigation for freeways; they do not absolve the lead agency from CEQA's mitigation requirements. The project should be required to pay its fair share toward mitigating traffic-related impacts. The DEIR should address project-specific traffic impacts and mitigation requirements consistently, regardless of whether the project impacts freeways or local roads. LR 11.19

On page 8-54, under Mitigation 8-6, the claim that "these projected 2025 cumulative freeway on-ramp operating condition impacts are anticipated to be resolved by the construction of the proposed new ramps at Geneva Avenue, a planned regional transportation improvement measure." appears to conflict with the Executive Summary on pages 2-24 and 2-25, which states that, "Because funding for these improvements has not been identified, they have not been assumed as part of the 2025 Cumulative scenario described in this EIR under Impacts 8-4 through 8-6." Please clarify which improvements have been assumed, scheduling of same, and identify the Visitacion Valley Redevelopment Program's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring for impact 8-6. LR 11.20

For Mitigation 8-7, on page 8-59, please provide alternative mitigations aside from modifying the signal timing phase (i.e. additional lanes). LR 11.21

Sufficient mitigation needs to be identified for Impact 8-8 on page 8-60. Project phases should not be approved until adequate mitigation can be developed, funded and implemented, and the project should be required to pay its fair share toward mitigating traffic-related impacts. LR 11.22

Please also consider other Transportation Operations System and Intelligent Transportation System mitigation options where applicable. LR 11.23

In the Technical Appendix, under the "Existing plus Project Conditions" scenarios analyses, the AM and PM Peak volumes for Intersection #9000 Alana Way/Beatty Avenue were used at Intersection #10000 Alana Way/Harney Way/Thomas Mellon Drive and vice-versa . LR 11.24

LR 11

Growth-inducing Impacts

On page 16-3, the statement that, "The primary growth-inducing impacts of the Project would be confined within the boundaries of the Project Area" should be supported by data and analysis. Certain roadway improvements necessitated by the project would occur outside of the project boundaries. LR 11.25

Community Planning

The proposed plan is expected to deteriorate the Level of Services (LOS) at seven intersections during the AM and PM peak. These impacted intersections are projected to deteriorate from LOS B to LOS F which would have negative spill-over effects onto State roads and facilities. As noted from the report, US-101 between Interstate 280 (I-280) and Third Street/Bayshore Boulevard, and US-101 between Sierra Point Parkway and Interstate 380 (I-380) are projected to deteriorate from LOS D to LOS E. LR 11.26

To reduce the potential impacts on State roads and facilities, consider improving pedestrian access and path of travel by:

- Improving pedestrian connectivity to MUNI T-Light Rail stations along Bayshore Boulevard. (Arleta Station and Sunnydale Station).
- Enhancing crosswalk treatments with special paving, lighting, etc. to enhance pedestrian safety and comfort.
- Widening crosswalks and sidewalk width; shortening crosswalk distance at intersections by means of bulb-outs.
- Improving crosswalks at all intersections with American with Disabilities Act compliant ramps and pedestrian countdown signal-heads that are audible for people with visually impairments.
- Adopting Travel Demand Management (TDM) policies for developments (i.e. lower parking ratio, provide car-sharing programs and transit subsidies, etc.) to encourage usage of nearby public transit lines.

Visual Impacts

Due to the close vicinity of the Visitacion Valley Redevelopment Area from US-101, what are the potential nighttime light and glare impacts? LR 11.27

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: LR 11.28

http://www.dot.ca.gov/hq/traffops/developscrv/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.

LR 11

Mitigation Monitoring

The CEQA, Public Resources Code Section 21081.6 and 21081.7, requires the Department to establish mitigation monitoring submittal guidelines for public agencies. The guidelines affect agencies that have approved development projects and are required under CEQA to provide the Department reports on transportation related mitigation monitoring measures. Please see the Department's *"Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation"* at the following website for more information: LR 11.29

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html

The Mitigation Monitoring Submittal Guidelines discuss the scope, purpose and legal requirements for mitigation monitoring reporting and submittal, specify the generic content for reports, and explain procedures for timing, certification and submittal of reports. Please complete and sign a Certification Checklist form for each approved development project that includes transportation related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed. LR 11.30

Please send signed Certification Checklist forms and supporting attachments to the address at the top of this letterhead, marked ATTN: Yatman Kwan, Mail Stop #10D. For supporting attachments, the CEQA lead agency, at its discretion, may also submit the entire mitigation monitoring program report for each project with the required transportation information highlighted. When the District has approved the submittal and signed the Certification Checklist form, a copy of the form will be supplied to your agency.

Should you have any questions regarding this letter, please call or email Yatman Kwan of my staff at (510) 622-1670 or Yatman_Kwan@dot.ca.gov.

Sincerely,

Lisa Carboni

LISA CARBONI
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse, San Francisco Planning Department

LR 11.01 (Caltrans)

Transportation and Circulation--mitigation responsibility--as co-lead agencies, San Francisco Redevelopment Agency and San Francisco Planning Department are responsible for all project mitigation, including any needed improvements to State Highways.

Response: Comment noted. The Redevelopment Agency and Planning Department will to work in conjunction with the Zone 1 developer(s) to propose, evaluate, assess, and develop mitigation implementation measures. Please see more detailed explanation of this required mitigation implementation process in response to Caltrans comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein, and to Caltrans comments LR 11.17 and LR 11.19 which follow below.

LR 11.02 (Caltrans)

Transportation and Circulation--mitigation implementation and monitoring responsibility--Visitacion Valley Redevelopment Program's fair share contribution, financing, scheduling implementation responsibilities and monitoring lead agencies should be fully discussed in project-specific traffic studies and the DEIR. Project's MMRP should be included in DEIR.

Response: The project Zone 1 development sponsor will be responsible for mitigating direct project-related impacts, and to contribute the appropriate fair share to the mitigation of future regional (interjurisdictional) impacts. Calculations of the project's fair share contribution to the regional transportation improvements will be subject to the on-going Bi-County Transportation Study effort, which will not be completed by the time the FEIR is adopted.

Following standard CEQA and San Francisco environmental review procedure, a Mitigation Implementation Monitoring and Reporting Plan (MMRP), (pursuant to CEQA section 15097) is being prepared by the Redevelopment Agency and Planning Department, the joint lead agencies, for Planning Commission and Redevelopment Commission approval concurrently with certification of the Final EIR (pursuant to CEQA section 15090) and/or with approval of associated written CEQA findings (pursuant to CEQA section 15091).

The Visitacion Valley Redevelopment Program EIR is the first of a number of anticipated and pending development projects in the City's southeast planning area and vicinity. A full and detailed comprehensive analysis of all of the cumulative effects of all of these projects is beyond the scope of this EIR.

CEQA section 15130, Discussion of Cumulative Impacts, subsection (b), indicates that the discussion of cumulative impacts in an EIR "need not provide as great detail as provided for the effects attributable to the project alone." "The discussion should be governed by the standards of practicality and reasonableness."

CEQA Guidelines section 15130, Discussion of Cumulative Impacts, subsection (b)(5) stipulates that an EIR should include a "reasonable analysis" of the cumulative impacts of relevant projects and shall "examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative impacts."

A project's contribution to significant cumulative impact will be rendered less than cumulatively significant if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines section 15130(a)(3)). No feasible physical mitigation for the subject Caltrans roadway system components has been identified by the lead agency or Caltrans. No subregional or regional fair share cumulative mitigation program has been officially established by Caltrans in coordination with the local jurisdictions in this area--i.e., San Francisco DPW, the City of Brisbane, the City of Daly City, CCAG of San Mateo County, etc.--that can be cited in this EIR as a means to implement or fund fair share mitigation measures designed to alleviate cumulative impacts of this nature.

Please also see response to Caltrans comment LR 11.06 in section 2.2.2 (Project Relationship to Local and Regional Plans) herein, and to Caltrans comments LR 11.17 and LR 11.19 that follow below. These responses describe the current interjurisdictional Bi-County Transportation Study program, and explain that Project Area developer fair share contribution to future approved interjurisdictional fair share funding programs will be required.

LR 11.03 (Caltrans) Transportation and Circulation--mitigation implementation phasing and scheduling--residential impacts--scheduling of project phases and required improvements should be clearly identified to ensure that residual impacts (those that remain after mitigation is applied) are clearly identified.

Response: Comment noted. See response to comment LR 11.02 above. The project Zone 1 development sponsor, in conjunction with the Redevelopment Agency, Planning Department and other San Francisco departments, will collaborate to develop an appropriate project mitigation implementation and monitoring program that will be included as part of the project approvals.

LR 11.04 (Caltrans) Transportation and Circulation--mitigation implementation phasing and scheduling--any required roadway improvements should be completed prior to issuance of project occupancy permits.

Response: As indicated in response to comment LR 11.02 above, a project Mitigation Implementation Monitoring and Reporting Plan (MMRP) is being formulated by the Redevelopment Agency and Planning Department. The

MMRP may include mitigation implementation and monitoring linked to specific project approvals and/or building or occupancy permits.

LR 11.05 (Caltrans)

Transportation and Circulation--mitigation implementation--encroachment permit requirement--an encroachment permit is required when a project involves work in the State's right-of-way (ROW). Caltrans will not issue an encroachment permit until its concerns are adequately addressed; therefore Caltrans strongly urge the lead agencies to ensure resolution of Caltrans CEQA concerns prior to submittal of an encroachment permit application.

Response: Comment noted. As evaluated, the proposed project does not propose improvements to any Caltrans freeway mainline or ramp facility. If, in the future, it is decided that improvements would be necessary, the project sponsor and the appropriate City agencies would work with Caltrans on any and all permitting requirements.

LR 11.06 (Caltrans)

Project Consistency with Local and Regional Plans/Transportation and Circulation--General Plan Transportation Element--UPR's 2003 General Plan Guidelines recommend estimating the cost of needed improvements as well as identifying viable funding sources correlated to the pace of improvements. However, DEIR does not refer to any General Plan policies requiring developers to offset their impacts to the transportation system by paying traffic impact fees or constructing required improvements. Policies requiring mitigation of project-related traffic impacts should be included in DEIR section 4.1.5, Transportation Element.

Response: DEIR section 4.1.5, Transportation Element, includes all San Francisco-adopted General Plan transportation policies pertinent to consideration of the physical impacts of the project.

In DEIR chapter 8, Transportation and Circulation, section 8.25, Visitacion Valley Community Facilities and Infrastructure Fee and Fund, describes how City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to future residential development in Project Area Zone 1 and at the nearby Executive Park development to mitigate impacts on public infrastructure in Visitacion Valley. In addition, as part of the Redevelopment Agency/Planning Department proposed Design for Development implementation program, the Agency intends to, as a condition of future development approvals in Zone 1, enter into Owner Participation Agreements (OPAs) with developers that, among other fair share infrastructure mitigation implementation requirements, will establish developer local transportation system improvement requirements, some of which may be "in kind" developer roadway, transit and pedestrian/bicycle system improvements, and some which may involve fair share developer contributions to broader local and regional transportation system improvement needs. It is the Agency's intent that all transportation-related fair share developer contribution needs identified in this EIR will be incorporated into the OPA(s).

In addition, following standard San Francisco Department of Public Works (DPW) practice, the final Design for Development will include implementation provisions which require as a condition of subdivision map approval(s) establishment of a Public Improvements Agreement (PIA) between the

developer and the DPW which will include infrastructure bonding amount specifics to be computed by the DPW.

The task of formulating an interjurisdictional transportation improvement prioritization and funding plan for all of the developing areas on both sides of the San Francisco/San Mateo County line, including the Bayview Hunters Point and Candlestick development programs, India Basin Shoreline/Area C Redevelopment program, Executive Park Neighborhood Plan, Visitacion Valley Redevelopment Program, and Brisbane Baylands Specific Plan and Daly City Cow Palace site development plan, goes well beyond the reasonable scope of an individual 30-acre, Visitacion Valley Redevelopment Program EIR. In recognition of the broader, interjurisdictional nature of future transportation needs and planning approaches for this area, the San Francisco County Transportation Authority (SFCTA) in partnership with several jurisdictions and agencies from both sides of San Francisco/San Mateo County line,[1] including the City of Brisbane, the San Francisco Planning Department, the San Francisco Redevelopment Agency, San Francisco MTA, the San Mateo County Transportation Authority and Caltrans, is now undertaking *The Bi-County Transportation Study,* a high-level interjurisdictional transportation improvement planning, prioritizing, and funding effort. The specific intent of the effort is to create a financing plan for the area's highest-priority transportation improvement needs, including contributions from federal, state, regional, local and private sector sources. *The Bi-County Transportation Study* is specifically intended to develop an implementation plan, including priorities, schedule, designs, public/private funding and implementation strategy to provide for the transportation improvements needed to accommodate these anticipated cumulative developments. The stated objectives of the study are to:

- identify a multimodal package of transportation improvements that address identified cumulative and local needs,

- develop cost estimates for top-priority major transportation infrastructure projects, needed transit services, and local circulation and access projects, and

- establish a funding and implementation strategy for these projects that considers appropriate level of contributions from public and private sources.

Specific identified region-serving transportation improvement needs to be considered in the study include the Bayshore Intermodal Station and station area, Caltrain Oakdale station, Bayview transportation improvements, Geneva Avenue extension project, Harney Way re-build project, Muni Third

[1]The full list of participants includes CCAG of San Mateo County, the San Francisco Mayor's Office of Economic and Workforce Development, City of Brisbane, City of Daly City, San Francisco Planning Department, San Francisco Redevelopment Agency, San Francisco Municipal Transportation Agency, San Francisco Department of Public Works, San Mateo County Transportation Authority, San Mateo County Transit District (SamTrans), Peninsula Corridor Joint Powers Authority (Caltrain) and Caltrans.

Street Light Rail line and Bus Rapid Transit line connections to the Bayshore station, the Geneva-Candlestick U.S. 101 interchange re-configuration, pedestrian and bicycle connectivity at the Bayshore station, Caltrain service plans and bus feeder service needs in the Brisbane Baylands and Visitacion Valley areas, and Transportation Demand Management efforts and policies for the area.

The cumulative transportation impact mitigation needs identified in the Visitacion Valley Redevelopment Program EIR, and anticipated future EIRs for the Executive Park Neighborhood Plan, Brisbane Baylands Specific Plan, Candlestick Point development, India Basin Shoreline Project, Hunters Point Shipyard Phase 2 Project,[1] and Daly City Cow Palace site development project, will also be considered in formulating the Bi-County Transportation Study recommendations.

In addition to this interjurisdictional programming and funding effort, the City and County of San Francisco is currently using State Proposition C funds[2] for transit planning activity in the Bayshore intermodal transit station vicinity, including Muni T light rail, Muni BRT, SamTrans transit service improvements, and new facilities for pedestrian and bicycle access to the intermodal station.

Also, the City of Brisbane has completed and submitted a Project Study Report (PSR)[3] to Caltrans for the proposed extension, widening and realignment of Geneva Avenue in Brisbane; and in a coordinated effort with the San Francisco DPW, has also submitted a PSR to Caltrans for construction of the Geneva/Harney Way/U.S. 101 interchange, with three alternative approaches (alignments and configurations) for the Geneva/ Harvey interchange also described, including an alignment underneath U.S. 101, and an overpass interchange component in both cloverleaf and diamond interchange configurations.

LR 11.07 (Caltrans) Transportation and Circulation--2025 benchmark year questioned--under baseline and cumulative scenarios, 2025 was used as benchmark year to assess future impacts; DEIR section 3.6.3, Redevelopment Plan Parameters, states that implementation of redevelopment actions will occur over a period of 30 years--i.e., project activities would be carried out until 2038 (assuming

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[1]The Candlestick Point, India Basin Shoreline and Hunters Point Shipyard Phase 2 Project are listed and discussed in the DEIR as three separate projects (see DEIR Table 5.1) but are being treated by the Planning Department and Redevelopment Agency as one "project" ("the Bayview Waterfront Project") for CEQA purposes and are currently being address on one Bayview Waterfront Project EIR. An NOP for the Bayview Waterfront Project EIR was released by the Planning Department and Redevelopment Agency on August 31, 2007.

[2]Under Proposition C, a percentage of sales tax collected in the jurisdiction is returned from the State for transportation-related programs and projects, including street rehabilitation and reconstruction, congestion management and planning, transit improvements, etc.

[3]A Project Study Report, defining and justifying a proposed regional transportation improvement project's scope, cost and schedule, is required before a project may be included in the State Transportation Improvement Program (STIP).

plan adoption in 2008); therefore, baseline and cumulative scenario would not adequately reflect project impacts for development between 2025 and 2038.

Response: It is anticipated that development of the proposed project could be completed by year 2025. In addition, this year was the future horizon year of the version of the San Francisco County Transportation Authority travel demand model that was used for the evaluation. With a further out horizon year (such as 2038), the amount of background growth would be higher, which would effectively reduce the project's contribution to the growth in vehicles from existing conditions, and therefore also its fair share contributions.

LR 11.08 (Caltrans) Transportation and Circulation--need for consistency among numerous project vicinity traffic analysis assumptions and methodologies to facilitate review by affected agencies including San Francisco, San Mateo County, Brisbane, C/CAG and MTC. Local and regional planning agencies should coordinate traffic analysis and mitigation to maximum extent possible, due to level of coordination required to ensure transportation infrastructure keeps pace with demand.

Response: Comment noted. All transportation studies undertaken for CEQA purposes in San Francisco utilize the same San Francisco County Transportation Authority countywide travel demand forecasting model (SFCTA Model) to develop travel forecasts for anticipated cumulative new development. Also, the City and County of San Francisco, SFCTA, City of Brisbane, San Mateo County Transportation Authority and Caltrans are currently coordinating to prepare the Bi-County Transportation Study (see response to comment LR 11.06 in previous section 2.2.2 (Project Relationship to Local and Regional Plans) herein. The purpose of this interjurisdictional effort is to develop a consistent set of regional roadway and transit improvements, priorities and funding responsibilities that will serve to guide the future improvement program for this area.

LR 11.09 (Caltrans) Transportation and Circulation--for planned improvements affecting State ROW, scheduling, costs and viable funding sources correlated to the pace of improvements should be identified.

Response: The project is not proposing to implement (either as part of the project or due to a mitigation measure) any changes to Caltrans freeway mainlines or ramps. The potential extension of Geneva Avenue and the potential new interchange with U.S. 101 are currently undergoing their own planning and environmental review process related to the Brisbane Baylands development program. Presumedly, this planning and environmental review process will include working with Caltrans regarding the required right-of-way, schedule, costs, and funding issues.

LR 11.10 (Caltrans) Transportation and Circulation--cumulative development pending in project vicinity--Table 5.1 (Cumulative Development Pending in Project Vicinity) on DEIR page 5.4 (Land Use section) should be expanded to provide a more comprehensive representation of pending and approved projects in the

vicinity. Table should include for each project: lead agency identification, size/units, AM, PM and daily trip generation, and anticipated implementation timeline.

Response: More detailed information regarding the land use program, travel demand estimates, and timelines is not currently available for all regional cumulative projects listed in the DEIR. For the purposes of the Visitacion Valley Redevelopment Program EIR analysis, it was reasonably anticipated that these projects would all be constructed by the 2025 horizon year, and the travel demand estimates were based on output from the San Francisco County Transportation Authority's regional travel demand model for 2025. Separate environmental review processes are or will be undertaken for each of these individual projects, at which time the environmental review lead agency, timeline, and associated travel demand assumptions will be publicized.

LR 11.11 (Caltrans) Transportation and Circulation--cumulative development pending in project vicinity--in Table 5.1, is Bayview Waterfront project different from Candlestick Point project plus Hunters Point Shipyard Phase 2 project? If project characteristics are different, please include the Bayview Waterfront project in the 2007 SFCTA Model on DEIR Transportation and Circulation chapter page 8-26, section 8.3.2, Project Travel Demand.

Response: The Candlestick Point, India Basin Shoreline, and Hunters Point Shipyard Phase 2 (aka, Bayview Waterfront project) are listed as three separate projects in Table 5.1, but are being treated as one "project" for CEQA purposes and will be addressed in one EIR. The Notice of Preparation (NOP) of an Environmental Impact Report for the Bayview Waterfront Project, issued by the Redevelopment Agency and Planning Department on August 31, 2007, indicated that *"Overall, the Bayview Waterfront Project would include new plans for the Candlestick Point, Hunters Point Shipyard, and the India Basin Shoreline areas of San Francisco. The Project encompasses an approximately 780-acre area east of US 101 in the southeast area of the City and occupies the waterfront area from India Basin to approximately Candlestick Point. The plan consists of a new stadium for the San Francisco 49ers and a mixed-use community with residential, retail, office/research & development/industrial, civic and community uses, and parks and recreational open space."*

As indicated in DEIR section 8.3.2, Projected Travel demand, subsection (a) Methodology/Approach, the San Francisco County Transportation Authority (SFCTA) countywide travel demand forecasting model (SFCTA Model) was used in the DEIR analysis to develop travel forecasts for the analyzed 2025 Project plus Cumulative Scenarios. The SFCTA Model divides San Francisco into 766 transportation analysis zones (TAZs) and also includes zones outside San Francisco for which data is obtained from the Metropolitan Transportation Commission (MTC). The SFCTA Model travel demand estimates incorporate land use and socio-economic growth forecasts for the year 2025 for San Francisco and the remaining eight Bay Area counties, including San Mateo County. The San Francisco projections are based on

existing zoning and approved development plans, including the anticipated extent of redevelopment of existing areas. In preparing this EIR, it was specifically determined that the existing SFCTA Model outputs did not include several specific substantial developments currently pending in the vicinity. The model was therefore rerun to add these several specific pending developments, consistent with project information known in November 2007.

Table 5.1 on DEIR page 5-4, the subject of this comment, lists those several specific pending developments that were added to the 2025 model run; they are also listed on DEIR page 8-26. The development specifics for these projects were not listed in DEIR Table 5.1 on page 5-4 or in the DEIR page 8-26 summary listing. The specifics known at that time that were incorporated into the DEIR 2025 cumulative model run are as shown on the expanded cumulative development table on the following page herein. The table on the next page expands upon DEIR Table 5.1, and includes the same project reference numbers and corresponds with the same cumulative project location map, DEIR Figure 5.1. The development specifics in this expanded table were reflected in the DEIR 2025 model run and accurate as of November 2007 and therefore comply with CEQA cumulative projects listing requirements (CEQA section 15130).

The details of these projects, including the number of residential units, number of commercial and office square feet, number of hotel rooms, etc., have continued to evolve upward or downward since November 2007, and may continue to evolve, as the various project design details are refined. For example, the Brisbane Baylands project characteristics assumed in the DEIR were based on the land owner's proposal for a Specific Area Plan submitted to the City of Brisbane in February 2006. Subsequently, in the summer of 2008, the City of Brisbane published a set of community-formulated land use alternatives for the Baylands Specific Plan, and expects to select a community-preferred alternative for full CEQA analysis. The land use alternatives now under discussion by the City of Brisbane include more open space and less development than was described in the land owner's February 2006 proposal.

Similarly the City and project sponsor for the Bayview Waterfront Project (including the Candlestick and Hunters Point Shipyard Phase 2 developments) have made recent revisions to the land use characteristics of that project from those identified in the DEIR. The original proposal in the Conceptual Framework Plan called for 8,500 housing units between the Candlestick and Hunters Point Shipyard developments. When the NOP for the Bayview Waterfront Project was published on August 21, 2007, the project included 9,000 housing units, but mentioned the potential for up to 10,000 units. The land use program inputted into the Visitacion Valley DEIR cumulative conditions modeling work assumed 9,500 units (6,500 at Candlestick Point and 3,000 at Hunters Point Shipyard). The Urban Design Plan for the project published on September 25, 2008 listed a total of 10,000 housing units. The October 25, 2008 Financial Plan discussed a total of 10,500 residential units.

SUBSTANTIVE CUMULATIVE DEVELOPMENT PENDING IN SOUTHEAST AREA--NOVEMBER 2007 (see DEIR Figure 5.1)

DEIR Fig. 5.1 Reference	Location/Project	Residents (Units)	Commercial (sq. ft.) (a)	Office (sq. ft.)	Hotel and Extended-Stay (sq. ft.) (b)	Other (sq. ft.)
1	**Executive Park**					
	Yerby	500	8,500 neighborhood serving			1,500 community space
	UPC	1,100	2,500 neighborhood serving			2,500 community space
	Total	1,600	11,000			4,000
2	**Visitacion Valley**					
	Schlage	1,250	47,000 supermarket			15,000 community education
			46,400 neighborhood serving			
			11,600 restaurant			
	Subtotal	*1,250*	*105,000*			
	Leland Ave	85				10,000 library
	Bayshore Blvd	250	21,200 community serving			
			5,300 restaurant			
	Subtotal	*250*	*26,500*			
	Total	1,585	131,500			25,000
3	**Candlestick Point**					
	Lennar	6,500	150,000 big-box	150,000	100,000 (b)	12,000 seat arena
			210,000 retail/rest/entertainment			69,000 seat stadium
	Total	6,500	360,000	150,000	100,000	81,000 seats
4	**India Basin Shoreline**					
	East India Basin	1,100				
	Total	1,100				
5	**Hunters Point Shipyard**					
	Phase 2	3,000	150,000 community serving			1,600,000 R&D
	Total	3,000	150,000			1,600,000
6	**Brisbane Baylands**					
	Phase 1		300,000 big-box	1,400,000	800,000	600,000 R&D
			325,000 community serving		700,000 (business)	400,000 convention/trade
			25,000 restaurant			250,000 light industrial
			200,000 auto dealers			
	Subtotal		*850,000*	*1,400,000*	*1,500,000*	*1,250,000*
	Phase 2		930,000 mixed commercial	1,390,000		1,015,000
	Total		1,780,000	2,790,000	1,500,000	2,265,000
7	**Daly City**					
	Cow Palace	1,000	225,000 community serving			
	Total	1,000	225,000			
	TOTALS	**14,785**	**2,657,500**	**2,940,000**	**1,600,000**	**3,975,000**
						81,000 seat arena + stadium

SOURCE: Derived by EIR transportation consultant, DMJM-Korve Engineering, from current San Francisco/San Mateo Bi-County Modeling Effort; November 1, 2007.

Notes:

(a) Retail square footage includes some combination of retail, restaurant and entertainment (cinema, etc.) uses
(b) Candlestick Point: 200 hotel rooms at an estimated 500 sq. ft. per room
(c) Development projections listed in this table are subject to change during the community planning process.
(d) The Bayview Waterfront project includes Candlestick Point, Hunters Point Shipyard Phase 2, and India Basin.

The India Basin Shoreline area project is now being covered in the same Bayview Waterfront EIR. The development program assumed for this project in the Visitacion Valley DEIR totaled 1,100 housing units. Planning staff are now discussing a zoning program that could significantly lower this housing total, and potentially include more commercial use. Such changes do not substantially affect the SFCTA 2025 model-based DEIR project plus cumulative impact and mitigation findings--i.e., do not substantially change the 2025 cumulative roadway and freeway impact and mitigation findings (Impacts 8-4 through 8-8 on DEIR pages 8-44 through 8-62).

The impacts of the final proposals for these three projects and their alternatives will be reviewed for their full range of cumulative impacts in the Draft EIR for the Bayview Waterfront Project to be published in 2009.

LR 11.12 (Caltrans) Transportation and Circulation--cumulative development ending in project vicinity--Table 5.1--please also include list of smaller projects (pending or approved) within surrounding area.

Response: The General Plan/maximum zoning capacity/redevelopment intensification assumptions reflected in the DEIR-applied SFCTA 2025 Model data are conservatively high and inherently account for smaller pending and approved projects causing related transportation impacts within the surrounding area. The 2025 Model includes baseline growth from known projects and anticipated infill development on "soft sites" (properties considered under-utilized) with the potential for new construction, as determined by a Land Use Allocation Model.

LR 11.13 (Caltrans) Transportation and Circulation--Transportation Management Plan initial and follow-up analysis--DEIR page 8-26--initial and follow-up analysis related to Transportation Management Plan should include data collection from nearby US 101 intersections as well as local roads; same type of data collection and analysis that is recommended for local roads should be applied to US 101/Bayshore/Third Street ramps and US 101 ramps at Alana Way, Beatty Avenue, and Harney Road.

Response: A queuing analysis was conducted by the EIR transportation consultants, DMJM/AECOM, using the Synchro plus SimTraffic 7 software package published by Trafficware for the following three intersections which are directly downstream of area off-ramps:

1. Alana Way/Harney Way/Thomas Mellon Drive (U.S. 101 NB Off-Ramp at Harney Way);

2. Bayshore Boulevard/Hester Avenue (U.S. 101 SB Off-Ramp at Bayshore Boulevard/Third Street); and,

3. Alana Way/Beatty Road (U.S. 101 SB Off-Ramp at Alana Way/Beatty Road).

The results of the queuing analysis for the weekday AM and PM peak hours are summarized in the table below.

Ramp	Storage (ft)	95th Percentile Queue at Downstream Intersection (ft)			
		Existing Conditions		Existing plus Project Conditions	
		AM	PM	AM	PM
U.S. 101 NB Off-Ramp at Harney Wy.	>1000	4	0	8	0
U.S. 101 SB Off-Ramp at Third St./Bayshore Blvd.	>1000	140	215	193	487
U.S. 101 SB Off-Ramp at Alana Wy./Beatty Rd.	1000	74	42	74	47

Ramp	Storage (ft)	95th Percentile Queue at Downstream Intersection (ft)			
		2025 Cumulative Conditions		2025 Cumulative plus Project Conditions	
		AM	PM	AM	PM
U.S. 101 NB Off-Ramp at Harney Wy.	>1000	10	21	17	53
U.S. 101 SB Off-Ramp at Third St./Bayshore Blvd.	>1000	237	279	351	682
U.S. 101 SB Off-Ramp at Alana Wy./Beatty Rd.	1000	83	52	83	52

As shown in the above tables, the project would increase queues at these downstream locations, but these increased queues are not expected to exceed the available storage capacity. Given these expected queue lengths, the project would not result in queues that would stretch to the beginning of the off-ramps, disrupting mainline flows.

It should be noted that under normal conditions, most project-generated traffic is not expected to use the off-ramps at Alana Way/Beatty Road, due to the need to "backtrack" via Tunnel Avenue and Blanken Avenue in order to access the site. While there would be some congestion on southbound Bayshore Boulevard in the vicinity of the project during the peak hours, there would likely still be time savings by using the Bayshore Boulevard/Third Street off-ramp at Hester Avenue as opposed to the Alana Way/Beatty Road off-ramp. Assuming, however, that a small percentage of the project-generated trips do use this "backdoor" to access the site, given the queue lengths in Existing Conditions and Cumulative Conditions and the substantial storage capacity available on the off-ramp, this project-generated traffic is not expected to cause off-ramp queues to stretch into the mainline traffic flow.

LR 11.14 (Caltrans) Transportation and Circulation--additional offramp and freeway mainline analysis requested--in DEIR section 8.1.1, Existing Roadway Network, pages

8-11, and section 8.3.5, Roadway System Impacts, on pages 8-48 and 8-49, provide analysis of offramps and assess potential queues onto freeway mainline.

Response: Please refer to the response to comment LR 11.13 for a discussion of project impacts to off-ramp queuing. As discussed, the project would not cause any queue spillbacks that would affect off-ramps and the freeway mainline.

LR 11.15 (Caltrans) Transportation and Circulation--need for consistency among numerous project vicinity traffic impact analyses--assumptions and methodologies applied to the Existing, Baseline and Cumulative conditions model should be consistent with those applied to traffic studies for other nearby projects listed on DEIR pages 8-26 and 8-27.

Response: Given that each of the various development proposals in the southeast San Francisco/north Brisbane/west Daly City area continue to evolve and change, it would be difficult to ensure that the EIR traffic analysis conducted for each proposal is strictly consistent with respect to cumulative development and other assumptions. As stipulated by CEQA Guidelines section 15125(a), the assumptions used in the Visitacion Valley Redevelopment Program DEIR transportation analysis are consistent with the land use programs and proposal details known at the time the NOP for the EIR was published. All studies within the City and County of San Francisco are also conducted under the methodology and guidance of the San Francisco Planning Department and utilize output from the San Francisco County Transportation Authority's travel demand model. As such, the underlying methodology and approach of these various projects are reasonably consistent. Please refer to the response to comment LR 11.11 for further discussion.

LR 11.16 (Caltrans) Transportation and Circulation--mitigation--mitigation for freeway segment operational impacts--under Mitigation 8-2 on DEIR p age 8-39, where DEIR states "...no feasible mitigation measures...," project future phases should not be approved until adequate mitigation can be developed, funded and implemented, and the project should be required to pay its fair share toward mitigating traffic-related impacts.

Response: All projects in the area will be required to contribute their fair share to mitigate any direct project, or cumulative contribution impacts. The ongoing, interjurisdictional Bi-County Transportation Study is currently developing a series of regional improvement measures and a methodology for prioritizing, scheduling and establishing fair share funding responsibilities. In general, the freeway segments would worsen without development of the project.

LR 11.17 (Caltrans) Transportation and Circulation--mitigation--fair share contribution suggested for local road impacts but not for US 101 impacts--Mitigations 8-2 and 8-4 suggest "fair share contribution" for mitigation of project local and road impacts, but not for impacts on US 101.

Response: The commenter asks why "a mechanism for 'fair share contribution' for traffic mitigation is suggested for project-specific impacts on local roads" "but not for impacts to US 101." The reference in this response to Mitigation 8-4 is apparently a typo, and should be Mitigation 8-5.

The reference in this comment to the DEIR mitigation of "project-specific impacts on local roads" apparently pertains to Mitigation 8-4 for 2025 Cumulative Impacts on Intersection Operation (the project contributes significantly to cumulative impacts on two local intersections--Bayshore Boulevard/Tunnel Avenue and Alana Way/Beatty Avenue), which states: "since the Project would have significant contributions to the future impacts at these two locations, establish a mechanism for Project fair share contribution to the implementation of these mitigation measures."

The reference in the comment to "impacts to US 101" appears to pertain to DEIR-identified Impact and Mitigation 8-2 for Existing Plus Project Impacts on Freeway Segments (DEIR page 8-39), and Impact and Mitigation 8-5 for 2025 Cumulative Impacts on Freeway Segment Operation (DEIR page 8-50). The Project contributes significantly to 2025 cumulative impacts on two freeway segments: U.S. 101 northbound between I-280 and Third Street/Bayshore Boulevard, and U.S. 101 northbound between Sierra Point Parkway and I-380. Mitigation 8-2 stated: "Due to freeway geometry and space constraints at these two locations, there are no feasible mitigation measures that could be implemented to reduce the Project's LOS impacts to less-than-significant levels." Mitigation 8-5 stated, "to improve the affected freeway segment conditions, additional mainline capacity would be needed, which would require land acquisition and involve substantial costs and mitigation issues. Mitigation of this impact is therefore infeasible..."

As explained in DEIR chapter 8, Transportation and Circulation, section 8.2.5, entitled "Visitacion Valley Community Facilities and Infrastructure Fee and Fund," City Planning Code section 319 has established a Visitacion Valley Community Facilities and Infrastructure Fee and Fund that would apply to future residential development in Project Area Zone 1 and in the nearby Executive Park development to mitigate the impacts of this development on public infrastructure in Visitacion Valley. In addition, as indicated in section 2.2.2 of this FEIR document in response to Caltrans comment LR 11.06, as a condition of future development approvals in Zone 1, the Agency intends to enter into Owner Participation Agreements (OPA) with developers that, among other fair share infrastructure mitigation implementation requirements, will establish developer transportation system improvement requirements, some of which may involve fair share contributions to broader, local and regional transportation needs. It is the Agency's intent that all transportation-related fair share developer contribution needs identified in the EIR will be incorporated into the OPA(s).

Regarding the mitigation of Project contribution to significant 2025 cumulative impacts on U.S. 101 freeway segments, the projected poor 2025 cumulative

conditions on these affected freeway segments could only be improved by creating additional mainline capacity, which would require substantial additional right-of-way acquisition, substantial freeway reconstruction, and associated substantial costs, and would require an associated interjurisdictional transportation improvement planning, prioritization and fair share funding formulation effort, that exceed the reasonable scope of the Project and reasonable control of the lead agency. Mitigation of this Project-related contribution to 2025 cumulative freeway congestion impacts to a less-than-significant level is therefore considered to be infeasible and the Project-related contribution to this cumulative freeway segment congestion represents a *significant unavoidable impact.*

More specific reasons for this DEIR infeasibility conclusion include:

- freeway mainline widening to provide acceptable operational conditions would require acquisition of substantial additional right-of-way, and substantial and infeasible reconstruction of the affected freeway links and associated existing over- and under-crossings, the costs of which far exceed the reasonable capability and responsibility of the Project, and for which no interjurisdictional fair share funding mechanism has been established;

- the co-lead agency (Planning Department and Redevelopment Agency) does not have jurisdiction over the affected freeway right-of-way; the necessary right-of-way acquisition would necessarily involve Caltrans use of its eminent domain powers;

- expansion of portions of the affected freeway segment rights-of-way is constrained by existing topography,

- acquisition of portions of the necessary additional freeway mainline and associated under- and over-crossing right-of-way, and subsequent construction of the necessary freeway mainline widening and associated under- and overcrossings, could not be achieved without the displacement of existing households and businesses and demolition of existing residential and commercial structures.

Mitigations 8-2 and 8-5 do state that implementation of individual project Transportation Management Plans (TMPs) as called for under Mitigation 8-1C would decrease the degree of project contribution to freeway segment operational impacts, but not to less-than-significant levels.

The EIR authors are unaware of any Caltrans-formulated or interjurisdiction-formulated improvement (widening) projects and associated funding programs for the affected U.S. 101 freeway segments towards which Project Area developers could be required to make a fair share contribution. The ongoing Bi-County Transportation Study is currently investigating inter-regional cumulative transportation network improvement needs and priorities, and is intended to identify an associated interjurisdictional fair share

calculation procedure, as explained in section 2.2.2 herein in response to Caltrans comment LR 11.06. The Planning Department and Redevelopment Agency will continue to participate in this Bi-County Transportation Study; will continue to advocate and cooperate with others in similar interjurisdictional study, planning and fair share funding efforts; and will continue to advocate alternative travel modes, including measures to incentivize increased Muni and Caltrain transit ridership in the area, establish freeway onramp metering in the area, establish HOV lanes in the area, etc.

In response to this comment, the following associated mitigation language has been added to page 3-21 of DEIR chapter 3, Project Description, and section 6.4.3 of the Redevelopment Plan:

"Require Project Area developer fair share contribution to off-site regional roadway system funding needs that have been identified at the time, as part of future OPA and/or other public improvement agreements between the Agency and developer, if and when feasible mitigation and/or improvement fair-share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, have been formulated through interjurisdictional study and cooperation, including the current interjurisdictional Bi-County Transportation Study effort. This requirement shall apply as a condition of approval for any Project Area residential development of 20 units or more, perhaps as part of the Visitacion Valley Community Facilities and Infrastructure Fee and Fund fair share mitigation requirement set forth in the Planning Code section 319."

LR 11.18 (Caltrans)

Transportation and Circulation--mitigation of 2025 cumulative impacts on intersection operation--effects on US 101 offramp--Mitigation 8-4, DEIR page 8-50, the existing pocket length on northbound Harney Way (northbound US 101 offramp) at Alana Way/Thomas Mellon Drive intersection left turn to southbound Alana Way (2,805 feet) is less than queuing length required for 156 cars (3,900 feet) for "2025 Cumulative AM Conditions" scenario; please provide additional mitigations for this impact.

Response: Intersection level of service operating conditions were developed using the Traffix software, the approved analysis software for this purpose in San Francisco. Although this software can be used to accurately forecast intersection delays and levels of service, since it looks at each intersection in isolation, it cannot be used for the evaluation of queuing conditions. As such, a separate comprehensive queuing analysis was conducted for this intersection, which showed that the queues would not affect freeway mainline conditions. For a discussion of that analysis, please refer to the response herein to comment LR 11.13.

LR 11.19 (Caltrans)

Transportation and Circulation--mitigation--2025 cumulative impacts on freeway segment operation--mitigation costs and complications do not absolve lead agency--Mitigation 8-5 (DEIR page 8-52) "significant unavoidable impact conclusion," associated land acquisition, substantial costs, and jurisdictional issues are complicated but are regularly resolved to implement mitigation for freeways and do not absolve lead agency from

CEQA's mitigation requirements; project should be required to pay its fair share toward mitigation of traffic-related impacts; DEIR should address project traffic impacts and mitigation requirements consistently, regardless of whether impacts involve freeways or local roads.

Response: The Bi-County Transportation Study is currently in process, sponsored by the SFCTA, San Francisco DPW, San Francisco Planning Department, San Francisco Redevelopment Agency, City of Brisbane and the San Mateo County Transportation Authority (see response to comment LR 11.06 in previous section 2.2.2, Project Relationship to Local and Regional Plans). One of the major goals of this effort is to develop a future interjurisdictional mitigation and improvement program, including a methodology for determining prioritization, scheduling and fair share funding contributions from all area-wide projects. As explained above in response to Caltrans comment LR 11.17, since any widening of U.S. 101 would require substantial additional right-of-way acquisition, substantial freeway structure reconstruction, substantial reconstruction of existing over- and under-crossing structures, and associated substantial funding and interjurisdictional agreements that are outside the project's control, freeway widening cannot be considered feasible mitigation in the context of the Visitacion Valley Redevelopment Program EIR. Also, as explained in response to Caltrans comment LR 11.17 above, if and when feasible mitigations and associated fair share funding measures for cumulative regional roadway system impacts, including freeway segment impacts, are formulated and adopted through the interjurisdictional Bi-County Transportation Study effort, associated Project Area developer fair share contribution to these identified funding needs will be required.

LR 11.20 (Caltrans)

Transportation and Circulation--mitigation--2025 cumulative impacts on freeway on-ramp operation--DEIR inconsistency--clarification requested--Mitigation 8-6 (DEIR page 8-54) states that anticipated 2025 cumulative freeway on-ramp impacts are expected to be resolved by construction of proposed new ramps at Geneva Avenue, "a planned regional transportation improvement measure;" statement appears to be in conflict with Executive Summary on DEIR pages 2-24 and 2-25 which states that, because funding for these improvements has not been identified, they have not been assumed as part of 2025 cumulative scenario described in this EIR under Impacts 8-4 through 8-6; please clarify which improvements have been assumed and their scheduling, and identify fair share contribution from Visitacion Valley Redevelopment Program, including financing, scheduling, implementation responsibilities and lead agency monitoring for Impact 8-6.

Response: The future 2025 Cumulative conditions included all major development projects in the area, including the proposed Bayview Waterfront, Executive Park, Brisbane Baylands and Cow Palace projects, in addition to the proposed project. The City of Brisbane is the lead agency for the Brisbane Baylands Specific Plan program and associated potential extension of Geneva Avenue and the U.S. 101 Harney Way interchange projects; these projects are currently undergoing their own separate environmental review and approval processes.

Two versions of the future (2025) cumulative conditions were developed and analyzed in the Visitacion Valley Redevelopment Program EIR: without the proposed regional roadway projects, and with the proposed regional roadway projects--both of which include the same various land use programs throughout the area. These two scenarios were developed to illustrate the full range of potential future cumulative impacts that may occur. Because the Brisbane Baylands Project and Bayview Waterfront Project in particular would directly necessitate these measures, their land use programs could not move forward without these proposed roadway improvements.

The results of the Visitacion Valley Redevelopment Program DEIR transportation analysis indicated that the proposed new interchange and extension of Geneva Avenue would resolve the project contribution to cumulative 2025 traffic impacts associated with these various anticipated developments.

As part of the ongoing Bi-County Transportation Study, a "fair share" calculation for the proposed areawide projects will be developed.

LR 11.21 (Caltrans) Transportation and Circulation--mitigation--2025 cumulative impacts on intersection operation with planned regional improvements--alternative mitigation requested--please provide alternative mitigation aside from modifying the signal timing phase (i.e., additional lanes) for Mitigation 8-7.

Response: Given the existing right-of-way constraints along the San Francisco local streets in and outside the project area, such as Leland Avenue and Sunnydale Avenue, it would not be feasible to increase the number of lanes available without substantial property acquisition. The widening of Bayshore Boulevard at these locations (at Leland Avenue and Sunnydale Avenue) would also be inconsistent with the desired pedestrian environment being created by the Muni T-Third LRT project. Widening of the roadway to this extent at these two locations would make the pedestrian crossings of Bayshore longer and potentially less safe, and would require more dedicated pedestrian crossing time as part of the signal phasing plan. Also, the signal timings at the intersections with Bayshore Boulevard are dictated by T-Third light rail line operations, which have signal priority, and the amount of time needed for pedestrians to safely cross the street. For these reasons, alternative mitigation was considered infeasible.

LR 11.22 (Caltrans) Transportation and Circulation--mitigation--2025 cumulative impacts on freeway segment operation with planned regional improvements--sufficient mitigation needed for Impact 8-8--project phase should not be approved until adequate mitigation can be developed, funded and implemented, and project should be required to pay its fair share toward mitigating traffic-related impacts.

Response: As discussed herein in response to comment LR 11.16, projects in the area will be required to contribute their fair share to mitigate any direct project impact, or project contribution to cumulative impacts. The ongoing Bi-

County Transportation Study is currently developing a series of regional improvement measures and a methodology for determining associated fair share contributions. In general, the freeway segments would worsen with or without development of the project, thereby not necessitating project-related mitigation.

LR 11.23 (Caltrans) Transportation and Circulation--other mitigation options--please also consider Transportation Operations System and Intelligent Transportation System mitigation options where applicable.

Response: Comment noted. The San Francisco Municipal Transportation Agency (SFMTA) is responsible for all ITS and TOS programs in the city, and has been working to implement and improve all signalized intersection operations and coordination activities.

LR 11.24 (Caltrans) Transportation and Circulation--Technical Appendix--under Existing plus Project Conditions scenarios analysis, AM and PM peak volumes for two intersections were switched--i.e., for Alana Way/Beatty Avenue (intersection #9000) and Alana Way/Harney Way (intersection #10000).

Response: In response to this comment, a detailed review of the volumes in the DEIR appendix was conducted, and they were determined to be correct.

LR 11.25 (Caltrans) Transportation and Circulation--CEQA-Required Assessment Conclusions--growth inducing impacts--external roadway impacts and improvement needs--statement on DEIR page 16-3 that primary project growth inducing impacts would be confined within Project Area should be supported by data and analysis; certain roadway improvements necessitated by the project would occur outside the project boundaries.

Response: The DEIR does not intend to suggest by the cited language on DEIR page 16-3 that certain offsite roadway improvements would not be necessitated by the Project. DEIR Chapter 8, Transportation and Circulation, is explicit with regard to Project-related offsite transportation system impacts and related mitigation needs.

Transportation improvements were evaluated throughout the study area and included an evaluation of mitigation and improvement measures at all study intersections.

The referenced language on DEIR page 16-3 with respect to external growth inducement has been revised in response to this comment, and now states (the "bracket" in the left margin indicates the location of the revised lines):

The primary growth-inducing impacts of the Project would be confined within the boundaries of the Project Area. To a lesser degree, secondary growth-inducing impacts (the "multiplier" effect) could also be expected in portions of the City and immediate area outside the Project Area boundary. In particular, Project-induced increases in the local residential population could be expected to have a "multiplier" effect, increasing community-supporting commercial and other activities in the surrounding area. In addition, Project-

facilitated infrastructure improvements, including the transportation system impact mitigation measures identified in chapter 8 (Transportation and Circulation) herein, as well as the land use intensification that would be facilitated within the Project Area, might induce additional pressure to intensify use of adjacent underused lands in the City of Brisbane's Baylands area.

Such secondary growth-inducing land use impacts outside the Project Area would occur primarily in the form of future individual development and business activity proposals and associated applications. Most of this primary and secondary growth inducement would be expected to occur in a manner consistent with existing General Plan and zoning controls and, where applicable, would also be subject to project-specific environmental impact documentation and public review under CEQA to ensure that any associated significant adverse environmental impacts are adequately addressed. These standard procedures and requirements would be expected to reduce such secondary growth-inducement impacts of the Project to less-than-significant levels, unless specific statements of overriding consideration were adopted consistent with CEQA.

LR 11.26 (Caltrans) Transportation and Circulation--mitigation--spillover impacts on state roads and facilities--consider improving pedestrian access and path at travel by implementing list provided of suggested pedestrian connectivity, crosswalk treatment, crosswalk widening, sidewalk widening, crosswalk shortening (bulb-outs), ADA compliance crossway ramp and audible pedestrian countdown signal head improvements, and adopting Travel Demand Management (TDM) policies for developments (e.g., lower parking ratio, car-sharing programs, transit subsidies) to encourage use of nearby transit.

Response: There is currently excellent pedestrian access to the T-Third Street stations at Arleta and Sunnydale, with pedestrian walk indicators and countdown signals. Bright yellow tactile treatments are provided at all crosswalk ramps on Bayshore Boulevard in the vicinity of the project, providing increased safety for the visually impaired and increasing driver visibility of curb queuing areas where pedestrians may be waiting.

As noted under DEIR Mitigation 8-1C (DEIR page 8-38), the Project would be required to implement a transportation management plan (TMP) comprised of several cohesive elements, such as carpool matching services, carshare hubs, real-time transit information, discounted transit passes, and parking supply reductions.

LR 11.27 (Caltrans) Visual Factors--nighttime light and glare impacts on US 101--due to the close proximity of the Project Area, what are the potential nighttime light and glare impacts on US 101?

Response: The potential nighttime light and glare impacts of Project Area (Redevelopment Area Zone 1) buildout on U.S. 101 would be less than significant. The Project Area (Zone 1) is not adjacent to the U.S. 101 freeway right-of-way, but rather is approximately one quarter to one third of a mile

from the freeway (see DEIR Figure 3.1), and visually buffered from the freeway by intervening existing urbanization and hill topography, including the Little Hollywood residential neighborhood located north and east of the Project Area along Lathrop, Blanken and Hester Avenues immediately west of the freeway right-of-way. An intervening hill and solid waste facility (land fill) visually buffers the project site from the nearest segment of U.S. 101 (between the Bayshore and Harney Road-Beatty Lane interchanges). The surrounding Visitacion Valley/Little Hollywood communities are already heavily urbanized with a myriad of exterior lighting and nighttime illumination sources. The freeway segment of Bayshore Boulevard to the San Francisco-Oakland Bay Bridge traverses the more highly urbanized areas of central San Francisco northeast of the Project Area. Added nighttime illumination sources from buildout of Zone 1 under the provisions of the proposed Design for Development would not be more prominent in the freeway view than the myriad of existing intervening and surrounding light sources. The more substantive nighttime light and glare issues in the City's southeast area include impacts from the freeway itself. Vehicles traveling along the freeway represent one of the most substantial sources of nighttime light and glare impacts in the City's southeast area with associated adverse effects on nighttime views.

LR 11.28 (Caltrans) Transportation and Circulation--encroachment permit requirement--Caltrans encroachment permit application process summarized.

Response: Comment noted. Any future mitigation elements that require encroachment permits will be coordinated with Caltrans.

LR 11.29 (Caltrans) Transportation and Circulation--mitigation--mitigation monitoring--Caltrans mitigation monitoring submittal guidelines for public agencies--the Caltrans guidelines affect agencies that have approved development projects--these agencies are required under CEQA to provide Caltrans reports on transportation related mitigation monitoring measures--CEQA Guidelines citation provided.

Response: Comment noted. Caltrans will receive copies of all documents, if requested.

LR 11.30 (Caltrans) Transportation and Circulation--mitigation--Caltrans mitigation monitoring guidelines--please complete, sign and return to Caltrans a Caltrans-established Certification Checklist form for each approved development project that includes transportation-related mitigation measures once the mitigation have been approved and also when they are completed.

Response: If any element of the project will necessitate interaction with Caltrans, all appropriate forms and coordination guidelines will be followed.

LR 12

City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH SECTION

Gavin Newsom, Mayor
Mitchell H. Katz, MD, Director of Health
Rajiv Bhatia, MD, MPH, Director of EH

August 1, 2008

Stanley Muraoka
Tom Evans
San Francisco Redevelopment Agency
1 South Van Ness Avenue, Fifth Floor
San Francisco CA 94103

RE: Comments on Visitacion Valley DEIR

Dear Mr. Muraoka and Mr Evans:

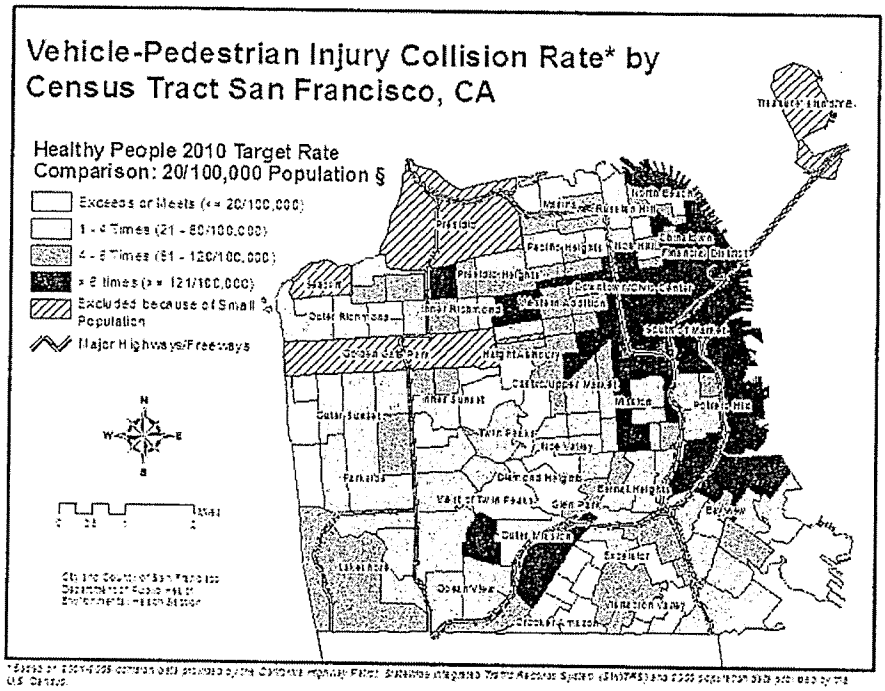
Thank you for allowing the San Francisco Department of Public Health the opportunity to review the Draft Environmental Impact Report for the Visitacion Valley Redevelopment Program and for accommodating our timeframe for this review. Overall, we believe that the project has the potential to have important and substantial benefits to community health in the Visitacion Valley neighborhood and our agency looks forward to providing support to the Redevelopment Agency as needed through the project's implementation phase.

Below are a number of specific comments on the DEIR enumerated by page number. We trust that these comments are clear and constructive, but we are happy to provide to provide clarification if needed.

1. Page 4-12. The final sentence in the section on the Air Quality Element should be revised. The project goals would reduce mobile source emissions at a regional level *but will increase mobile source emissions in the project area.* As worded, the statement is misleading. The San Francisco Air Quality Element aims to prevent exposure to unhealthy levels of air pollutants at all geo-spatial level, including the neighborhood, city and regional level. LR 12.01

2. Page 8-16. The discussion of baseline conditions should include data on pedestrian-vehicle collisions in the project area. The map below illustrates pedestrian-vehicle collision rates in San Francisco along with relevant area level differences. SFDPH research documents that spatial differences in collision rates for pedestrians are dependent on population, commercial uses, high traffic volumes and street types. Providing a map of the location of pedestrian-vehicle collisions in the project area over the past 10 years would be helpful in identifying high hazard locations that could benefit from focused pedestrian design efforts. This would be particularly relevant given that traffic and pedestrian patterns may have changed significantly in the past year with the opening of the Third Street Light Rail near the project site. The SFDPH would be happy to provide such a map to the Redevelopment Agency for the final EIR. LR 12.02

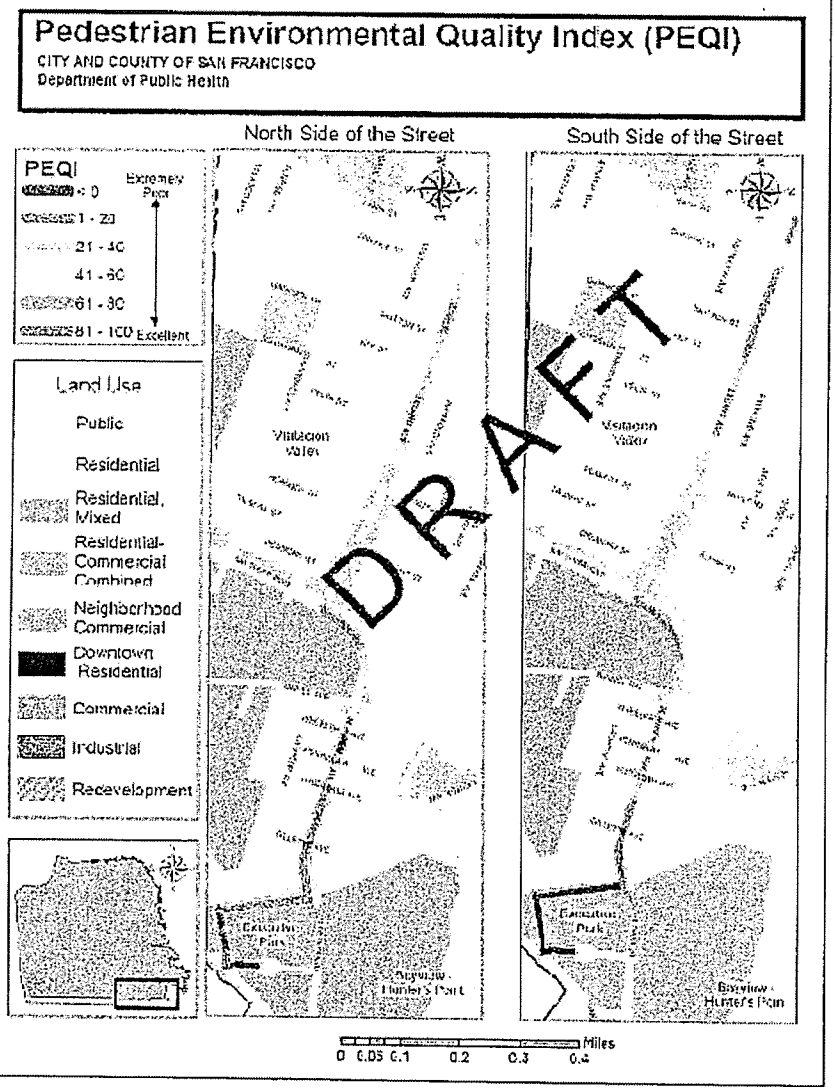
1390 Market Street, Suite 210 San Francisco, CA 94102
Phone 252-3800, Fax 252-3875



3. Page 8-64. The section on pedestrian impacts concludes that additional pedestrian trips could be accommodated adequately with existing sidewalks and cross walks. It is important to note that adequate sidewalk capacity is only one element of an adequate pedestrian environment and the concept of pedestrian level of service or pedestrian quality incorporates many other elements. Our preliminary analysis of Pedestrian Quality for the Executive Park SubArea Plan found that pedestrian quality in the areas just north of the Schlage Lock site, specifically along Bayshore Boulevard near the Third Street Light Rail stop, and along segments of Blanken Avenue, were poor pedestrian environments that could benefit from greater investments to promote walking and biking to/from Leland Avenue and Candlestick Park (see Diagram below) The project sponsor may consider, as an improvement measure, to conduct an analysis of the pedestrian environment using an available instrument such as the San Francisco Pedestrian Quality Index (http://www.sfphes.org/HIA_Tools_PEQI.htm) to better inform design and development with regards to pedestrian needs.

LR 12.03

Figure 6. Executive Park and the Pedestrian Environmental Quality Index (PEQI)



From Page 37 of the Executive Park Subarea Plan Health Impact Assessment Report. Available online at: http://www.thehdmt.org/executive_park.php

4. Page 8-65. In the section on pedestrian impacts, the DEIR identifies roadway intersection conditions that create potential for pedestrian-vehicle collisions. The DEIR subsequently documents that the project would increase both pedestrian and vehicle flows which suggests an increase in frequency of conflicts and collisions. These conditions and project-related effects on flows appear to be potentially significant impact requiring mitigation however, the DEIR does not acknowledge the potential for the conditions to result in a significant impact

LR 12.04

on pedestrian hazard. Subsequently, the DEIR identifies a number of well established pedestrian injury mitigation strategies to be integrated into the project. Again, this suggests an unacknowledged potentially significant impact. Some critical strategies such as traffic calming should be described more specifically for the context of the project. The DEIR states that the implementation of particular strategies, including bulb outs and pedestrian signal heads, would reduce the impact to less than significant. While the strategies are known effective pedestrian safety mitigations, it is unclear from the analysis how the DEIR comes to the conclusion that these design elements combined with the existing hazards and increased flows result in a less than significant impact. The DEIR should provide substantive evidence for the basis of this determination.

5. Page 8-66. The proposed retention of segment of the bicycle lane network in lieu of a new motor-vehicle left turn lane is consistent with the city's transportation, health and environmental policy goals. SFDPH supports the mitigation to avoid the impact on bicycle conditions and to accept potential impacts on automobile convenience. **LR 12.05**

6. Page 9-3. The sections on regulatory roles should clarify that Bay Area Air Quality Management District regulates *stationary* source emissions in the Bay Area. **LR 12.06**

7. Page 9-6. The first sentence of the first paragraph is not consistent with scientific knowledge about particulate matter and health. According to California Air Resources Board (CARB), exposure to particulate matter *below* current ambient air quality standards results in the listed health impacts. Extensive public health research on particulate matter has not been able to demonstrate a threshold of exposure below which health effects do not occur. This is also the position of CARB. According to a cost-benefit analysis done by the CARB in 2002 and 2008, significant health impacts result from ambient PM 2.5 above natural background concentrations and below current state standards.[1] **LR 12.07**

8. Page 9-6. The following information should be added to the section (h) on asbestos: **LR 12.08**

   State of California regulations require an asbestos airborne toxic control measures (ATCM) for construction, grading, activities in areas known to have naturally occurring asbestos (NOA) (California Code of Regulations § 93015). In 2002, the Bay Area Air District subsequently issued regulations for the control of airborne asbestos for areas where NOA is found or is likely to be found. Information on the regulation is available at the URL: http://www.baaqmd.gov/enf/compliance_assistance/asbestos_atcm/index.htm. Under the air districts regulations, all construction projects that disturb less than one acre must comply with specified control actions, including application of water to areas being excavated or grading, wetting or covering soil storage piles, limiting vehicle speeds, and controlling dispersion by vehicles offsite. For projects that disturb greater than one acre must gain approval from the district on a more comprehensive written plan to minimize emissions and control sources.

9. Page 9-12: San Francisco's General Plan Air Quality Element establishes a goal of clean air planning to reduce the level of pollutants in the air, to protect and improve public health, welfare and quality of life of the citizens of San Francisco and the residents of the metropolitan region. The General Plan also recognized that the majority of air pollutants are generated on roadways from vehicle emissions. Please include reference to Policy 3.7 which **LR 12.09**

1 California Air Resources Board, Particulate Matter Staff Report, 2002

calls for assessment of air quality hazards through modeling and prevention of new air quality hazards through building design and should be listed in the EIR.[2]

10. Page 9-20. The DEIR does not provide any analysis and of roadway related air pollution impacts on new sensitive uses which are related to significance criteria (4) and (5). Impact of roadway vehicle pollutants on nearby sensitive uses, including residential uses, are potentially significant because of the proximity of development to busy roadways in San Francisco. Health research has consistently demonstrated that children living within 100-200 meters of freeways or busy roadways have poorer lung function and more asthma and respiratory symptoms than those living further away. In 2005, the California Air Resources Board issued guidance on preventing roadway related air quality conflicts, recommending localities avoid placing new sensitive uses within 500 ft of many freeways. In 2007, environmental review of the Eastern Neighborhoods Zoning and Area Plans identified roadway air pollution exposure on sensitive uses as a significant environmental impact and required project level assessment and appropriate ventilation system to mitigate these impacts. Also in 2007, the San Francisco Department developed guidance to assess and prevent health impacts associated with locating new residential uses near roadway air pollution hot spots. This guidance is available at: http://www.sfdph.org/dph/files/EHSdocs/AirQuality/MitigateRoadAQLUConlicts.pdf) In 2008, the San Francisco Planning Department is currently requiring developers of sensitive use near busy roadways to conduct air quality site assessment under the guidance of SFDPH. The DEIR should, at minimum, identify the potential issue, conduct a screening level analysis to determine whether an air quality assessment of the site, and conduct the assessment if indicate. The SFDPH believes that roadway volumes will not likely trigger requirements for detailed air quality modeling; however, we need information on roadway volumes to make that determination. If needed, SFDPH can conduct an analysis of roadway related air pollutants for the project sponsor. **LR 12.10** **LR 12.11**

11. Page 9-20. SFDPH disagrees with the statement in Section 9.3.3 that Carbon monoxide is "the pollutant of greatest concern associated with new vehicle trips and traffic patterns." Engine and emissions technologies have largely prevented the creation of CO hotspots regardless of traffic congestion. Traffic related air pollutants with potential for public health impacts include particulate matter, nitrogen oxides, and mobile source air toxics like diesel exhaust.

12. Page 9-18. SFDPH commends the inclusion of best practices to mitigate construction air quality impacts as mitigations for the project. **LR 12.12**

13. Page 13-4. Please provide the references for the factors cited for typical building construction noise attenuation of 20-25 dBA with windows closed. **LR 12.13**

14. Page 13-4. Sleep disturbance is a non threshold effect of noise and occurs over a wide range of noise levels with an increasing proportion of awaking at higher levels of noise. Sleep disturbance and other noise-related effects can negatively impact health, as illustrated in the World Health Organization's Guidelines for Community Noise available at: http://www.who.int/docstore/peh/noise/guidelines2.html U.S. Federal Interagency Committee on Noise published the following relationship between sleep disturbance and noise (http://www.fican.org/pdf/nai-8-92.pdf). **LR 12.14**

$$\%\ Awakening = (7.079 \times 10^{-5}) \times \text{Single Event Noise Level}^{3.496}$$

[2] POLICY 3.7 Exercise air quality modeling in building design for sensitive land uses such as residential developments that are located near the sources of pollution such as freeways and industries.

15. Page 13-22. Based on the data on existing conditions, short term and single event noise from Caltrain operations and along Bayshore Blvd. appear to create the greatest hazards for nighttime sleep disturbance and other health impacts associated with noise. The DEIR identifies projects within 75 ft of the Caltrain line and along Bayshore as significantly impacted by noise. Given both the high short term noise levels and the fact that that typical attenuation of noise is 3 dB for each doubling of distance from the source, it appears that existing noise sources could create significant impacts for a greater share of the project's noise sensitive used. Both documented, verifiable attenuation factors and short term noise levels should be used to identify impacted areas and requirements for mitigations. **LR 12.15**

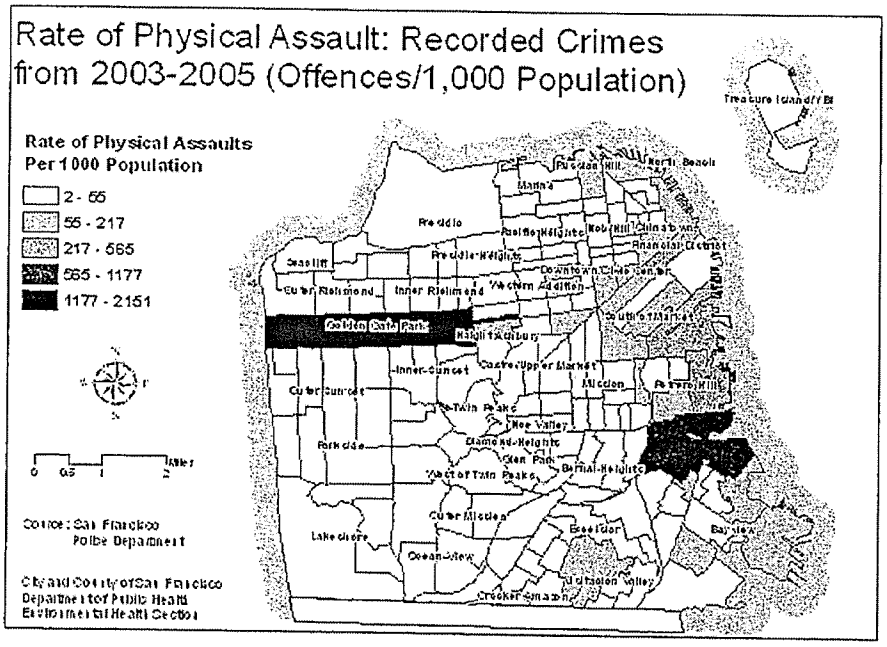
16. Page 13-23. In Mitigation 13-3, the areas subject to required noise mitigation measures or at least acoustical analysis should likely encompass a larger share of the project based on the comment above. **LR 12.16**

17. Page 13-23 In Mitigation 13-3, SFDPH supports the additional requirements for submission of acoustical analysis to the SFRA however, requirements for acoustical insulation should additionally be triggered by the need to mitigate short term noise levels of 70 (not only long term measures) where noise occurs during regular hours of sleep. **LR 12.17**

18. Page 13-23. In Mitigation 13-3, when acoustical analysis requires, air circulation systems to permit windows to remain closed, SFDPH discourages the use of Z-ducts especially along busy roadways because of their potential to entrain outdoor pollution indoors. **LR 12.18**

19. Page 13-23. In Mitigation 13-3, SFDPH recommends a simple requirement for pre-occupancy noise testing to ensure compliance with noise mitigation objectives. **LR 12.19**

20. Page 14-3. SFDPH disagrees that the redevelopment of the Schlage Lock property would necessarily increase the overall demand on police services. Residential population density is only one factor related to the demand for police services. Density is not clearly related to crime in San Francisco (See map from the Healthy Development Measurement Tool indicator SC.1 below) The development of the site— a vacant, underutilized property—, area economic improvement, and the social and economic integration of the area could all have benefits on the reduction of crime and the perception of crime. Overall, we agree with the conclusion that the project would be unlikely to have adverse impacts on the need for police protection. **LR 12.20**



21. Page 14-3. SFDPH commends the inclusion of three new parks totaling 2.5 acres within the project. These would result in significant beneficial impacts to both the environmental and human health. We further concur with the recommendations of the Recreation and Parks Department for the development of safe pedestrian and bicycle routes (or greenways) among parks in the vicinity of the project area.

Thank your in advance for your consideration of and response to these comments.

Sincerely,

Rajiv Bhatia, MD, MPH

Director of Environmental and Occupational Health

LR 12.01 (DPH) Air Quality--Air Quality Element--edits requested to wording in final sentence of this section on DEIR page 4-12 so that it reads: The project goals would reduce mobile source emissions at a regional level, but will increase mobile source emissions in the project area; otherwise, language is misleading.

Response: Comment acknowledged. In response, the wording in the final sentence of this section on DEIR page 4-12 has been revised to read: "In general, the proposed Project goals to increase transit access and enhance non-auto travel (see section 4.1.6 above) would reduce the degree of Project-related mobile source emissions increases." This revised version of DEIR page 4-12 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.02 (DPH) Transportation and Circulation--pedestrian conditions--section 8.13, Pedestrian Conditions, on DEIR page 8-16 should include baseline data on pedestrian-vehicle collisions in project area. Collision rates map would be helpful (comment letter follows this comment with the necessary data and map information).

Response: The San Francisco Municipal Transportation Agency (SF MTA) regularly monitors the current pedestrian activity and accident information throughout the city. Within the vicinity of the project site, there are no locations within the identified top twenty pedestrian safety location of concern in the City.

LR 12.03 (DPH) Transportation and Circulation--pedestrian impacts--section 8.3.7, Pedestrian Impacts, on DEIR page 8-64, should note that sidewalk capacity is only one element of an adequate pedestrian environment; concepts of pedestrian levels of service or pedestrian quality also incorporate many other elements. DPH preliminary analysis indicates that pedestrian quality in areas just south of Schlage Lock site, specifically along Bayshore near Third Street Light Rail stop, and along segments of Blanken Avenue, was poor and could benefit from greater investments to promote walking and biking to/from Leland Avenue and Candlestick Park (map provided). Project sponsor may consider, as an improvement measure, conducting an analysis of the pedestrian environment using an available instrument such as the San Francisco Pedestrian Quality Index.

Response: Comment noted. As part of the proposed project, substantial improvements to on-site pedestrian access are proposed, including new pedestrian sidewalks and walkways and improvements to existing sidewalks, including supporting the Leland Avenue Streetscape Plan. These will provide alternative pedestrian routes through the site, instead of requiring use of the current sidewalks along Bayshore Boulevard and cross-streets. The evaluation of area-wide transportation conditions is beyond the reasonable scope of the Visitacion Valley Redevelopment Program EIR and study effort, but may be appropriate as part of one of the much larger-scale development projects currently pending in the area (such as the Bayview Waterfront Project) or the Bi-County Transportation Study.

LR 12.04 (DPH) Transportation and Circulation--pedestrian impacts--DEIR page 8-65 identifies roadway intersection conditions that create pedestrian-vehicle conclusions and suggests an increase in the frequency of conflicts and conclusions--these project-related effects appear to be a potentially significant impact requiring mitigation. Subsequently, DEIR identifies a number of pedestrian injury mitigation strategies to be integrated into project--this suggests an unacknowledged potentially significant impact. Some critical mitigation strategies (a number are suggested--e.g., bulb-outs, etc.) are suggested to reduce impact to less than significant level. DEIR should provide substantial evidence for the basis of its determination that project design elements combined with existing hazards and increased flows will result in a less than significant impact.

Response: The project proposes to include a series of pedestrian improvement measures, including corner bulbs at the major intersections with Bayshore Boulevard. In addition, the project would include substantial improvements to pedestrian facilities throughout the project site. Through the pedestrian evaluation conducted for the DEIR, it was determined that although the number of pedestrian/vehicular conflicts may increase (due to the increase in pedestrian and vehicular volumes), these would not rise to the level of significant safety impacts. Therefore, mitigation is not required.

LR 12.05 (DPH) Transportation and Circulation--bicycle impacts--DPH supports mitigation described in DEIR section 8.3.8, Bicycle Impacts, to avoid impacts on bicycle conditions.

Response: Comment noted.

LR 12.06 (DPH) Air Quality--air pollutants and ambient standards--BAAQMD jurisdiction--DEIR page 9-3--section should clarify that BAAQMD regulates <u>stationary</u> emissions in Bay Area.

Response: The language on DEIR page 9-3 that read, "An air quality management district is responsible <u>primarily</u> (underline added) for regulating stationary emission sources at facilities within its geographic areas and for preparing the air quality plan as required under the federal Clean Air Act and California Clean Air Act," has been revised in response to this comment to read: "An air quality management district is responsible for regulating stationary emission sources at facilities within its geographic areas and for preparing the air quality plan as required under the federal Clean Air Act and California Clean Air Act, and for enforcing CARB ambient air quality and mobile emission source standards." This revised version of DEIR page 9-3 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.07 (DPH) Air Quality--air pollutants and ambient standards--DEIR page 9-6--corrections provided to language here about particulate matter and health.

Response: The first sentence on Page 9-6 has been modified as follows: *"Extensive research reviewed by CARB indicates that exposure to outdoor PM_{10} and $PM_{2.5}$ levels ~~exceeding current ambient air quality standards~~ is associated with increased risk of hospitalization for lung and heart-related*

respiratory illness..." This revised version of DEIR page 9-6 is included in section 3 (Revisions to the Draft EIR) herein.

LR 12.08 (DPH) Air Quality--air pollution and ambient standards--asbestos--DEIR page 9-6--additional information (paragraph) provided for insert here to clarify State regulations for asbestos.

Response: In response to this comment, the following suggested additional language on State asbestos regulation has been added to DEIR page 9-6: *State of California regulations require an asbestos airborne toxic control measures (ATCM) determination for construction and grading activities in areas known to have naturally occurring asbestos (NOA) (California Code of Regulations § 93015). In 2002, the Bay Area Air District subsequently issued regulations for the control of airborne asbestos for areas where NOA is found or is likely to be found. Information on the regulation is available at the URL: http://www.baaqmd.gov/enf/compliance_assistance/asbestos_atcm/index.htm. Under the air districts regulations, all construction projects that disturb less than one acre must comply with specified control actions, including application of water to areas being excavated or grading, wetting or covering soil storage piles, limiting vehicle speeds, and controlling dispersion by vehicles offsite. Projects that disturb greater than one acre must gain approval from the district on a more comprehensive written plan to minimize emissions and control sources.* This revised version of DEIR page 9-6 has been included in section 3 (Revisions to the Draft EIR) herein.

LR 12.09 (DPH) Air Quality--San Francisco General Plan--DEIR page 9-12--please include reference to Air Quality Element--Policy 3.7 pertaining to assessment of air quality hazards.

Response: In response to this comment, the suggested reference to Air Quality Element Policy 3.7 pertaining to assessment of air quality hazards has been added to DEIR page 9-12. Air Quality Element Policy 3.7 states: *Exercise air quality modeling in building design for sensitive land uses such as residential development that are located near the sources of pollution such as freeways and industries.* This revised version of DEIR page 9-12 has been included in section 3 (Revisions to the Draft EIR) herein.

LR 12.10 (DPH) Air Quality--long-term local air quality effects--roadway related air pollution impacts--DEIR does not provide any analysis offroad-related air pollution impacts on new sensitive uses related to significance criteria (4) and (5). Such impacts are potentially significant because of proximity of development to busy roadways in San Francisco. Health research data presented in comment on such effects. SFDPH guidance for assessing and preventing impacts associated with locating new residential uses near roadway air pollution hot spots cited in comment. DEIR at a minimum should identify the potential issue, conduct a screening level analysis to determine whether an air quality assessment of the site is warranted, and conduct the assessment if indicated. SFDPH believes that roadway volumes will not likely trigger requirement for detailed air quality monitoring; however, Department needs information on roadway volumes to make this determination. If needed,

SFDPH can conduct analysis of roadway related air pollutants for the project sponsor.

Response: In 2005 the California Air Resources Board published an air quality/land use handbook.[1] The handbook was developed in response to recent studies that have demonstrated a link between exposure to poor air quality and respiratory illnesses, both cancer and non-cancer related. The CARB handbook recommends that planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools and playgrounds. Air pollution sources of concern included:

High traffic freeways and roads,
Distribution centers,
Rail yards,
Ports,
Refineries,
Chrome plating facilities,
Dry cleaners, and
Large gasoline dispensing facilities.

A key recommendation in the CARB handbook is to avoid siting new, sensitive land uses within 500 feet of a freeway or urban roadway with 100,000 or more vehicles per day. The Project Area does not include any lands within 500 feet of a freeway or roadway carrying 100,000 vehicles per day. The closest segment of the U.S. 101 James Lick Freeway to the Project Area is approximately 1,150 feet away--i.e., greater than 500 feet. While rail lines do pass through the Project Area, there are no remaining operational rail yards within or near the Project Area.

In May of 2008 the San Francisco Department of Public Health (DPH) published additional guidelines for assessment and mitigation of health effects from roadways that go beyond those of the CARB.[2] According to this DPH document, a potential hazard exists if average daily traffic volumes exceed the following thresholds:

- 100,000 vehicles / day within a 150 meter radius
- 50,000 vehicles / day within a 100 meter radius
- 10,000 vehicles /day within a 50 meter radius.

The guidance document provides a screening procedure and a methodology for determining health risk acceptability for specific sensitive receptors prior to development approval. These screening analysis procedures, including estimation of exposure (where warranted) and incorporation of mitigating design measures recommended by the DPH into the development design

[1]California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective,* 2005.

[2]San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review,* May 6, 2008.

would be required when individual project plans are submitted for Planning Department review.

LR 12.11 (DPH) Air Quality--long-term air quality effects--SFDPH disagrees with statement on DEIR page 9-20, section 9.3.3, Long-Term Air Quality Effects, that carbon monoxide is pollutant of greatest concern associated with new vehicle trips and traffic patterns. Traffic-related air pollutants with potential health impacts also include particulate, nitrous oxides, and mobile source air toxics like diesel exhaust. *(Statement based on BAAQMD guidelines.)*

Response: In response to this comment, the second sentence of the second paragraph on page 9-20 which stated, "At the local level, the resultant pollutant of greatest concern is carbon monoxide," has been deleted. Please see this revision to DEIR page 9-20 in section 3, Revisions to the Draft EIR, herein.

LR 12.12 (DPH) Air Quality--construction period impacts--DEIR page 9-18--SFDPH commends DEIR inclusion of best management practices to mitigate construction period air quality impacts.

Response: Comment acknowledged. No response necessary.

LR 12.13 (DPH) Noise--structural attenuation--DEIR page 13-4, subsection n(b)--provide references for the factors cited for typical building construction noise attenuation of 20-25 dBA with windows closed.

Response: The HUD *Noise Guidebook* is one source. *The Noise Guidebook*, U.S. Department of Housing and Urban Development, page 6 states "HUD's regulations do not contain standards for interior noise levels. Further, a goal of 45 decibels is set forth and attenuation requirements are geared towards achieving that goal. It is assumed that with standard construction any building will provide sufficient attenuation so that if the exterior level is 65 L_{dn} or less, the interior level will be 45 L_{dn} or less." Hence, 20 dB attenuation is assumed in the DEIR for any new building.

Highway Traffic Noise Analysis and Abatement Policy and Guidance, U.S. Department of Transportation Federal Highway Administration, June 1995, Table 7 (page 10) is another source. Light frame buildings with ordinary sash windows are shown to have a building noise reduction of 20 dB, and 25 dB with storm windows. In California, the state's energy and noise insulation standards have resulted in standard construction superior to construction assumed in the early 1980's. Numerous detailed analyses of actual building plans and measurements of finished buildings by Illingworth & Rodkin, the EIR noise consultant, demonstrate that standard California construction provides sound insulation in the 20-25 dBA range.

LR 12.14 (DPH) Noise--sleep disturbance--general information provided regarding sleep disturbance as an effect of noise for possible insert on DEIR page 13-4.

Response: Field and laboratory studies have shown that transportation noise can disturb sleep. This is a complex phenomenon. Research in the laboratory and research in the home environment have lead to different

findings regarding noise induced sleep disturbance. This affect is further complicated because laboratory studies measure changes in sleep state, a more subtle affect than awakening. The World Health Organization recommends L_{max} levels of 45 dBA or less for intermittent sounds. Illingworth & Rodkin, the EIR noise consultant, has recommended L_{max} levels of 50 dBA or less in bedrooms and 55 dBA or less in other rooms based on various historical studies and guidance from the State Office of Noise Control, DOHS. A recent study on self-reported sleep disturbances due to railway noise found a substantial increase in reported effects when maximum intermittent noise levels were greater than 50 dBA inside the bedroom. The passby frequency of trains during the nighttime was shown to have an effect on reported sleep disturbances; the effect was different for difficulty falling asleep and for awakenings.[1]

LR 12.15 (DPH) Noise--sleep disturbance--area of site affected--DEIR data on existing conditions (DEIR page 13-22) indicate that short term and single event noise from Caltrain operations and Bayshore Blvd. traffic appear to create hazards for nighttime sleep disturbance and other health impacts associated with noise. It appears that existing noise sources could crate significant noise impacts for a greater share of the project's noise sensitive uses than indicated in DEIR. Both documented, verifiable attenuation factors [see comment 12.13] and short term noise levels should be used to identify impacted areas and mitigation requirements.

Response: As trains passed by noise monitoring site LT-1 noise levels typically reached a maximum (L_{max}) of 90-95 dBA. Intermittent maximum noise levels from vehicular traffic on Bayshore Boulevard generated similar L_{max} noise levels. Maximum instantaneous noise levels drop off with distance at the rate of about 6 dBA with each doubling of the distance from the source. Standard California construction provides 20-25 dBA of noise reduction. Therefore, at a distance of 500 feet from the roadway and railroad tracks where typical outdoor noise levels would be in the range of 70-75 dBA L_{max}, interior levels would range from 45-55 dBA. Buildings throughout most of the site could, therefore, potentially be exposed to excessive interior single-event noise levels as a result of railroad train passages and loud vehicle passages on Bayshore Boulevard.

LR 12.16 (DPH) Noise--mitigation--expansion of acoustical analysis requirement recommended--re: Mitigation 13-3 on DEIR page 13-23 (for potential new development noise exposure impacts)--areas needing mitigation likely encompass larger share of project area, as per comment 12.15.

Response: Single-event noise could potentially impact residential sleeping areas proposed throughout most of the Project Area. Shielding provided by buildings located along the railroad and Bayshore Boulevard corridors would likely provide substantial attenuation for the interior areas of the site. These

[1] "Self Reported Sleep Disturbances due to Railway Noise: Exposure – Response relationships for nighttime Equivalent and Maximum Noise Levels", Aaseang, Moum, and Engdahl, *Journal of the Acoustical Society of America*, July 2008.

measures could therefore be included as one of the "site planning techniques" called for under Mitigation 13-3.

LR 12.17 (DPH) Noise--mitigation--expansion of acoustical analysis requirement recommended--re: Mitigation 13-3 on DEIR page 13-23 (for potential new development noise exposure impact)--SFDPH supports DEIR acoustical analysis requirement, but states that requirement should be triggered by need to mitigate short term levels of 70 (as well as long-term levels) where noise occurs during normal sleep hours.

Response: See response to comments 12.15 and 12.16.

LR 12.18 (DPH) Noise--mitigation--use of Z-ducts discouraged--re: Mitigation 13-3 on DEIR page 13-23--where acoustical analysis requires AC systems to permit windows to remain closed, SFDPH discourages use of Z-ducts, especially along busy roadways, "because of their potential to entrain outdoor pollution indoors."

Response: DEIR Mitigation 13-3, 2nd bullet, has been revised to state that the air circulation system shall be satisfactory to the City of San Francisco local building official, and "Z"-ducts are discouraged. See this revision to DEIR page 13-23 in section 43 Revisions to the Draft EIR, herein.

LR 12.19 (DPH) Noise--mitigation--pre-occupancy testing recommended--re: Mitigation 13-3 on DEIR page 13-23--SFDPH recommends simple requirement for pre-occupancy testing to ensure compliance with noise mitigation objectives.

Response: The following bullet has been added to Mitigation 13-3:

- *Pre-occupancy noise testing following a methodology satisfactory to San Francisco Department of Health shall be completed prior to occupancy to demonstrate compliance with noise mitigation objectives.*

See this revision to DEIR page 13-23 in section 3, Revisions to the Draft EIR, herein.

LR 12.20 (DPH) Public Services--police services--disagreement with DEIR conclusion that project would increase police service demands--SFDPH disagrees with DEIR page 14-3 statement that redevelopment of Schlage Lock property would necessarily increase overall demand for police services--density is not clearly related to crime in San Francisco (map provided); development of vacant, underutilized site and economic and social improvement in project area could reduce crime; overall, SFDPH agrees with DEIR conclusion that project would not have a significant adverse impact on the need for police protection.

Response: The DEIR discussion of project-related increases in police service demands is based on close and detailed consultation with appropriate San Francisco Police Department personnel. The comment is correct that the increased police service demand conclusion does not in this case translate into a significant physical environmental impact.

APPENDIX 4.4

REMEDIATION STATUS UPDATE FOR REDEVELOPMENT ZONE 1

UNIVERSAL PARAGON CORPORATION
150 Executive Park Blvd., Suite 4200
San Francisco, CA 94134-3309
Tel: (415) 468-6676
Fax: (415) 468-6678

To: Tom Evens

From: Steven Hanson, General Manager UPC

Date: September 8, 2008

Subject: Outline of Settlement Case Titled Universal Paragon Corporation,(UPC) et al. vs. Ingersoll Rand Company, et al. UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA CASE NO. 05-3100

Historic Context:

In 1994, UPC was ordered by the Regional Water Quality Control Board (RWQCB) under an approved Department of Toxic and Substance Control (DTSC) Remedial Action Plan (RAP) to install a Ground Water Collection System in the former Southern Pacific Rail Road Yard just south of the former Ingersoll Rand/Schlage Lock property in San Mateo County. That system has been operating since its recent shutdown in August of 2008. The ground water collection systems consisted of several ground water wells installed in the northern portion of Brisbane in the former rail yard. These wells contain pumps that pump groundwater to a collection system where it is filtered through charcoal and sand and gravel filters and then pumped to the San Francisco sewer treatment system. The system is regularly maintained and filters cleaned and ground water monitored. Since the systems installation the contaminated ground water plume has been substantially reduced.

It was determined in groundwater tests that were conducted as early as 1988, that the ground water south of Sunnydale had contained Chlorinated Volatile Organic Compounds (CVOC's) present in the samples. These VOC's also contained trichloroethylene (TCE), dichloroethylene (DCE), perloroethylene (PCE) and vinyl chloride. At that time it could not be determined the source of these CVOC's. However, subsequently, it was determined that the Chlorinated VOC's were used primarily by the Schlage Lock Manufacturing Co. as a degreaser compound for the many metal parts used in the manufacturing of locks and door hardware. The Schlage Lock Manufacturing Co. was up gradient of the railroad yard and groundwater flowed towards the rail yard under substantial pressure from the surrounding hillsides. Schlage had always indicated that it was not responsible for any of the groundwater contamination.

Southern Pacific was the land owner and the operator of the rail yard since its inception. UPC acquired the Railyard and the former landfill operations known as the Baylands from Southern Pacific in 1989. It subsequently acquired the portion of the former rail yard in San Francisco, just east of the Schlage plant in 1990.

The railroad had been in operation of the former rail yard since the early 1900's for rail car maintenance operations, locomotive maintenance and as a rail car storage yard. The rail maintenance operations closed down in 1960 and the rail car storage operations closed down sometime later. The railroad, in its operations, would routinely treat the soil in the rail yard with lead based arsenic for the purpose of weed and vector control. The railroad did not use CVOC's but probably transported those chemicals in tank cars.

Not long after the acquisition of the Baylands by UPC, the State of California Department of Health Services issued to Southern Pacific, UPC and Oyster Point Properties (a UPC subsidiary) an Imminent and/or Substantial Endangerment Order (ISEO) which required those entities to remediate the

groundwater contamination on the former SPRR site - at that point UPC was the only owner of the property.

Not long afterwards, the Regional Water Quality Control Board and DTSC determined that the Baylands should be set up in regulatory zones. Those zones (or Operable Units) included the area of the rail yard north of the intersection of Bayshore Blvd. intersected by Geneva. This area was designated Operable Unit 1 (OU-1) and was designated as DTSC's regulatory jurisdiction. OU-1 is the area that was affected by CVOC's in the groundwater (see attached map). OU-2 in the former rail yard is located south of the Geneva/Bayshore Blvd. intersection and is under the regulatory control of the Regional Water Quality Control Board. Contaminants of concern in OU-2 include heavy metals (lead and arsenic) in the surface soil and some subsurface Bunker "C" oil that was spilled from storage tanks used by the Railroad in its fueling operations of the old steam trains. The third regulatory zone on the Baylands is the former sanitary landfill. This site east of the existing Caltrain right of way is also under the regulatory control of the Regional Water Quality Control Board.

Clean-up and UPC Damage Claims

Since early 1995, when UPC had to spend substantial funds in order to meet the regulatory requirements and comply with the ISEO for OU-1, UPC has made various attempts to make a financial claim against Ingersoll Rand for reimbursement of costs incurred by UPC for the groundwater clean-up. Ingersoll Rand, failed to respond favorably to any request, and several lawsuits and/mediation sessions occurred over a 10 year period. In all of its efforts, Ingersoll Rand denied that it had anything to do with contaminating the groundwater. In early 2005, UPC dismissed its attorney, who failed to maintain the terms of a Tolling and Cooperation Agreement that would extend the rights and obligations of parties under an earlier lawsuit. The Tolling Agreement had been expired for nearly two years. By June of 2005, UPC hired a new law firm and proceeded to file a new lawsuit in the United State District Court, for the Northern District of California. The new lawsuit asserted UPC's claim against Ingersoll Rand for substantial relief and claims for damages suffered in the past and for future damage and relief, including negligence, nuisance, public nuisance, trespass, indemnity, breach of contract, liability, estoppel and the like.

In an effort to avoid a lengthy and costly trial, UPC and Ingersoll Rand agreed to additional mediation. Several mediation sessions were conducted with each party presenting their case under the auspices of a private mediator. While this effort, attempted to reduce costs, the mediation efforts did not produce the desired results, in a timely manner. The final settlement was reached under the supervision of a Federal Magistrate Judge. However this did not occur before UPC and Ingersoll Rand prepared for jury trial and prepared all the evidence, trial exhibits and contracted with expert witnesses. With this effort, very little cost savings resulted. After final mediation under the supervision of the Magistrate Judge, UPC and Ingersoll Rand came to a settlement agreement outlining basic terms in February of 2007.

Settlement Terms

The settlement terms would provide UPC with ownership of the former Schlage property which consisted of approximately 12 acres but only if UPC agreed to remediate the property to meet the needs of the future development on the site. The preliminary settlement required that UPC would obtain a Guaranteed-Fixed Price Remediation Contract that would be approved by Ingersoll Rand. It required that the contract would include insurance against known and unknown contamination and provide a Pollution Legal Liability policy which protected Ingersoll-Rand and UPC from future liability exposure. One complication was that Ingersoll Rand wanted UPC to accept its preferred contractor without doing its own due-diligence. IR reluctantly agreed to a process where UPC could select its own qualified contractor. Another complication was that, generally these types of guaranteed clean up contracts are issued only after a defined RAP is approved by the regulatory agencies. There is significantly more exposure to an insurer as well as a cleanup contractor and risk partner when an approved RAP has not been issued. Without a RAP, the required cleanup parameters are not fully quantified. UPC solicited, through a

Request for Proposal and Qualification solicitation (RFPQ) process, a remediation contractor who could provide UPC with a Guaranteed Fixed Price Remediation and Environmental Liability Transfer for the development project that UPC and the City of San Francisco were contemplating. It obtained 12 responses only two of which ended up being responsive to the requirements, at least in the written responses. Once the full significance of a total liability transfer agreement was realized after being drafted by UPC's attorneys even the final selected risk contractor that indicated it could meet the requirements withdrew its proposal leaving UPC with no party willing to take the liability and administration for the cleanup. The process resulting in this failure took nearly 12 months, resulting in a delay of settlement and a continued threat that the settlement could not be reached without a federal trial.

The remediation/technical contractor that had previously participated in developing the technical work as a party to the initial liability transfer effort was MACTEC and MACTEC was able to bring to the negotiation table a new liability partner willing to undertake the administration and uninsured risk of both MACTEC's contract as well as the regulatory administrative process. As well the liability partner assumed the obligation to negotiate an AIG insurance policy. The company willing to undertake this effort was Brownfield Partners. UPC undertook a 6 month process of negotiating the contract among Brownfield Partners, MACTEC and AIG. That final settlement was reached and all documents signed, among all the parties on May 28, 2008. At the same time and throughout the process Ingersoll-Rand also review documents and entered into final agreements with UPC to finalize the settlement. The final property transfer occurred on May 30, 2008 with close of escrow and the lawsuit was settled.

Summary of Environmental Conditions and Planned Remediation of the Former Schlage Lock and Universal Paragon Corporation (UPC) Properties

San Francisco, California

Prepared for the San Francisco Redevelopment Agency by BP PLT-I, LLC
September 2008

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FIGURES

Figure 1: Site Map

1.0 INTRODUCTION

This document describes the environmental conditions and outlines the planned remediation activities on the Schlage Lock property and on the adjacent northern portion of the former Southern Pacific (SP) Brisbane Rail Yard property, Operable Unit One (OU-1), both of which are owned by Universal Paragon Corporation (UPC). This document is intended to support the Draft Environmental Impact Report published by the San Francisco Redevelopment Agency on June 3, 2008, and therefore addresses only the property located in San Francisco, California. The properties are depicted on Figure 1, Site Map.

Numerous soil and groundwater investigations have taken place on both properties over the years. Data collected to date indicate that releases occurred at the Schlage Lock property during the years of its operation, and that chemicals in those releases contaminated both the Schlage site and the adjacent former SP OU-1 property. Historical operations at the SP Brisbane Rail Yard also resulted in contamination of the SP OU-1 property, in addition to the contamination that migrated from the Schlage property. Contamination resulting from historical operations at the Schlage Lock facility is predominantly chlorinated volatile organic compounds (CVOCs), while contamination resulting from operations at the former SP Brisbane Rail Yard is primarily heavy metals.

The Schlage Lock property transferred to UPC on May 30, 2008, as part of a settlement between UPC and the Ingersoll-Rand Company, the former owner of the Schlage property. At the time of that settlement, a Consent Order was negotiated with the California Department of Toxic Substances Control (DTSC) to address the cleanup of both the Schlage Lock and SP OU-1 properties. Under the terms of the 2008 Consent Order, new Operable Units (OUs) were defined for the properties, as follows. The **Schlage OU** consists of all contamination on the Schlage Lock site, as well as any VOCs present on the former SP Brisbane Rail Yard OU-1 property. The **UPC OU** consists of all contaminants other than VOCs on the SP OU-1 property.

The remedial strategy for both OUs is to clean up contamination in soil, soil vapor, and groundwater to standards established by DTSC, consistent with the land uses proposed in the development plans.

1.1 Proposed Remediation Schedule

In order to allow a phased redevelopment of the site to proceed on schedule, a two-phase cleanup approach is planned, to be implemented following the demolition of the existing buildings. Therefore, the timing for the two phases of clean up is tied to the issuance of a demolition permit. Phase I of the cleanup will be focused primarily on the property north of Visitation Avenue, although some remediation will

start on other portions of the property at the same time. There is limited contamination in the northern portion of the site, and it is expected that all soil clean up and initial groundwater treatment can be completed within 18 months of the start of demolition. Phase II of the remediation will be to complete all active groundwater treatment and all soil cleanup on the Schlage and UPC OUs south of Visitation Avenue. It is expected that Phase II of the cleanup will be completed within 30 months of the start of demolition. Even after contamination is cleaned up to levels that allow redevelopment, groundwater monitoring will continue to ensure that concentrations do not rebound and to demonstrate to the satisfaction of DTSC that the remedy is complete and permanent.

2.0 BACKGROUND INFORMATION

2.1 Site Description

The former Schlage Lock and the northern portion of the former SP Rail Yard OU-1 properties together consist of approximately 20 acres in the City and County of San Francisco, located north of Sunnydale Avenue and between Bayshore Boulevard on the west and the Union Pacific/Joint Powers Board railroad tracks on the east (Figure 1). The surface elevation ranges from approximately 30 feet above mean sea level (AMSL) in the north to approximately 10 feet AMSL in the south.

The Schlage Lock property is located north of Sunnydale Avenue and east of Bayshore Boulevard, at 2401-2555 Bayshore Boulevard in San Francisco. It is the location of the former Schlage Lock Company manufacturing facility and is approximately 12.7 acres in size.

The former SP Brisbane Rail Yard is located north of Geneva Avenue and east of Bayshore Boulevard, in San Francisco and Brisbane. This property consists of the northern portion of the former SP Brisbane Rail Yard, which was previously designated by DTSC as Operable Unit One (OU-1) in connection with planned work on the adjacent Baylands property. The SP OU-1 property consists of parcels in both San Francisco and San Mateo Counties, which together total 41.4 acres. The San Francisco portion of OU-1 is approximately seven (7) acres.

2.2 Historical Use Summary

The Schlage Lock Company manufactured door hardware and lock parts at the property from 1926 to 1999. Schlage Lock started its operations in a building known as Plant 1. The size of the facility was expanded by the acquisition of Plant 2 in 1942, Plant 3 in 1950, and lastly Plant 3X in 1963. The manufacturing processes conducted at the plant included stamping and machining metal alloys; deburring brass, bronze, nickel, silver and steel parts; electroplating; and cleaning and degreasing brass and bronze

parts. The Ingersoll-Rand Company acquired the Schlage Lock Company in 1974, which included the original manufacturing facility and property in San Francisco.

In 1980, Pacific Lithograph Company acquired Plant 3. Pacific Lithograph used solvent products in lithographic processing until 1993. In 1995, Touch-Plate International, a Schlage subsidiary, acquired the Plant 3 and 3X Buildings from Pacific Lithograph. The Schlage Lock Company ceased all manufacturing at the Site in 1999 and removed all of its equipment, except for several USTs that were closed in place. Buildings remain on the Schlage Lock property, but are unoccupied except for site security personnel.

The SP Brisbane Rail Yard OU-1 property was acquired by Southern Pacific Transportation Company (SPTC) in 1896. SPTC operated the former Brisbane Rail Yard from 1914 through 1960. The property was used for railcar rehabilitation, locomotive maintenance operations, and material transfer operations. Herbicides were used to clear the track rights-of-way; this is believed to be the primary source of the elevated lead and arsenic concentrations at the site. The SP OU-1 property was acquired by Sunquest Properties, Inc. (a wholly owned subsidiary of UPC, which was formerly named Tuntex) in 1989. No manufacturing operations or other activities (except for groundwater extraction, treatment and monitoring) have occurred on the OU-1 property since it was acquired by Sunquest.

2.3 Site Geology and Hydrogeology

The site geology consists of layers of marine and alluvial (sand) deposits. The following is the order of the principal geologic layers at the site, from the ground surface downward: fill; marine deposits; a sand layer known as the A-Sand; an aquitard; and a second, deeper sand layer known as the B-Sand. These layers, and where they occur at the property, are described below.

A layer of surface fill overlies the geologic deposits in most parts of the property. The fill consists of a mixture of clay, silt, coarse sand, and gravel, with fragments of brick, stone, wood, and other debris from the 1906 San Francisco earthquake rubble. The thickness of the fill varies. It is up to 15 feet deep in some areas of the property, and pinches out entirely in the northern portion of the property.

The marine deposits, also termed Bay Margin Deposits, consist of interbedded layers of fine-grained materials such as clays, silts and silty-sands, and include a characteristic marine deposit known as the Bay Mud. The Bay Margin Deposits are first found between 3 – 15 feet bgs and are about 10 feet thick. The Bay Mud only occurs in the southern-most portion of the property, and the other Bay Margin Deposits pinch out entirely toward the north.

The alluvial deposits are fine- to medium-grained sands. These occur in layers throughout the property at varying depths. The first sand layer encountered below ground surface (bgs) is termed the A-Sand to distinguish it from the deeper sand layer, known as the B-sand. The A-Sand is present at the ground surface in the northern portion of the property, where there is no fill or Bay Margin Deposits; it is present either directly beneath the fill, or beneath both the fill and the Bay Margin Deposits in other parts of the property. The A-Sand layer is 20 feet thick. The B-Sand layer is first found at approximately 55 feet bgs and is about 30 feet thick.

The A-Sand and B-Sand are separated by an aquitard. The aquitard is a 20- to 30-feet thick layer of clay that serves as a hydraulic barrier between the two sand layers. This means that groundwater in the lower B-Sand is not in contact with groundwater in the A-Sand. Groundwater first occurs at depths of 4 to 15 feet bgs beneath the southern part of the site, and transitions to approximately 60 feet bgs in the northern portion of the property, largely because of the elevation gain to the north. Beneath the southern areas of the property, where Bay Margin Deposits separate the fill from the A-Sand, groundwater is found in the fill, forming a perched saturated zone on top of the Bay Margin Deposits. In these areas, the groundwater in the underlying A-Sand (beneath the Bay Margin Deposits) occurs under confined conditions. Groundwater in the B-Sand also occurs under confined conditions with a significant upward gradient; some B-Sand wells exhibit artesian flow.

Groundwater flow is generally to the south across the site. The flow, however, is affected by the combined sewer located in Sunnydale Avenue, portions of which, depending on the season, are below the water table. Depending on the season, the sewer may influence groundwater gradients by intercepting the flow from the north and conducting it laterally to the east (under elevated water table conditions), or by augmenting groundwater flows downgradient to the south (under lower water table conditions).

2.4 Soil Contamination

Soil contamination consists of chlorinated volatile organic compounds (CVOCs) and heavy metals. The most significant source area on the Schlage OU is associated with the former degreaser area and sump located in the northeastern corner of Plant 3/3X. Tetrachloroethylene (PCE) and trichloroethylene (TCE) concentrations as high as 150 milligrams per kilogram (mg/kg) and 23 mg/kg (respectively) were reported in soils near the former degreaser sump, prior to the startup of a soil vapor extraction (SVE) system. With over eight years of SVE operation, it is expected that CVOC concentrations are significantly lower in this area than historically observed. Elevated CVOC concentrations also have been reported in the southwest portion of the site, near the southern portion of Plant 3/3X.

Heavy metals, including arsenic, cadmium, chromium and lead, are found in soils at various concentrations throughout both properties. The highest concentrations of metals are found near the railroad tracks on the Brisbane portion of the UPC OU. One small area of elevated metals concentration has been found in the San Francisco portion of the UPC OU, again near the railroad tracks. On most of the Schlage property, heavy metals, while present, are not at concentrations above their naturally occurring background levels. Background levels for heavy metals are presented in a Burns and McDonnell report titled "*Human Health Risk Assessment for the San Francisco County Parcel of Operable Unit-1*", dated April 2006.

2.5 Groundwater Contamination

In general, there is a widespread area, or plume, of groundwater contaminated with CVOCs under the Schlage Lock property that extends to the east and south, and has migrated to the south and east onto the adjacent UPC (former OU-1) property. At the plume's maximum extent, concentrations of CVOCs that are above the drinking water standard are limited to an area of approximately 2,000 feet long by 500 feet wide.

The levels of groundwater contamination are highest in the fill and the A-Sand. CVOC concentrations in excess of 10 milligrams per liter (mg/L) have been measured in monitoring wells that sample groundwater in the fill and A-Sand layers, near and downgradient of the former degreaser sump, north of Sunnydale Avenue. CVOC concentrations in the B-Sand groundwater are significantly lower, with maximum concentrations of approximately 0.2 mg/L.

2.6 Previous Investigations

Investigations to assess the nature and extent of contaminants have been conducted on the SP OU-1 site and the Schlage Lock property beginning in 1982. Five subsurface investigations have been conducted on the SP OU-1 property, and ten subsurface investigations have been conducted on the Schlage property. Altogether, approximately 179 borings have been advanced, with hundreds of soil samples collected and analyzed from the borings. In addition, 73 monitoring wells and 14 piezometers have been installed (10 monitoring wells have since been abandoned), with quarterly groundwater monitoring taking place.

2.7 Previous and Existing Remedial Measures

Previous remedial efforts at the former Schlage Lock facility have included removal of USTs and excavation of petroleum-impacted soil; removal of the primary sources of CVOC contamination (e.g., sumps, etc.); excavation of soil hot spots around the primary sources of CVOC contamination; and

installation of a soil vapor extraction and treatment system (SVETS). Remedial activities on OU-1 include installation of a groundwater extraction and treatment system (GWETS) to intercept the contaminated groundwater flowing from the Schlage site onto the OU-1 property.

In 1987, four USTs were abandoned in place at the Schlage Lock facility, and another UST was reportedly cleaned and converted into a storage tank for boiler make-up water. A Certificate of Completion letter from the City/County of San Francisco Department of Public Health dated January 11, 1988, stated that all work was completed satisfactorily and that no further investigation or clean up was required at that time. There were no reports of petroleum hydrocarbon contamination in any of the soil samples analyzed in connection with the UST closure activities (LW Environmental Services, 1987-88).

In 1993, approximately 3,500 cubic yards of petroleum-contaminated soil was removed from the former sludge trap area of OU-1 (IT Corp, 1994).

In 1998, several sumps and contaminated floor slabs were removed from the former degreaser area of Plant 3 of the Schlage facility, along with approximately 80 cubic yards of CVOC-contaminated soil (Treadwell and Rollo, 1998). No primary sources of CVOC contamination have been identified on UPC OU-1.

In 1999, a SVETS was installed near the former degreaser sump at the Schlage Lock facility. The SVETS consists of six extraction wells, one piezometer, and 23 monitoring points. Treated vapor is discharged under a permit with the Bay Area Air Quality Management District (BAAQMD). The SVETS has removed approximately 3,500 pounds of CVOCs from unsaturated zone soils, with the majority of CVOC mass removed during the initial months of operation. Removal rates were significantly lower following the initial months of operation, as is typical of SVETS mass removal following start-up.

The GWETS was constructed in 1994 and became fully operational in 1995. It consists of seven active groundwater extraction wells located on the OU-1 portion of the Site. Three of the groundwater extraction wells are located in the San Francisco County portion of OU-1. The four other wells are located in San Mateo County. One GWETS extraction well was decommissioned in 1999. Treated water is discharged to a sanitary sewer under an existing industrial wastewater discharge permit.

3.0 PROPOSED REMEDIAL APPROACH

3.1 Regulatory Issues

While owned by Ingersoll-Rand, Schlage Lock was under an Imminent and Substantial Endangerment Order (Order; IS&E 06/07-002) issued by DTSC in July 2006, naming Schlage Lock Company, Ingersoll-Rand and Touch-Plate International, Inc. as responsible parties.

As part of the transfer of the Schlage Lock property from Ingersoll-Rand to UPC, a new Consent Order was negotiated. UPC and BP-PLT I, LLC are the signatories to the new Order, which addresses both the Schlage OU and UPC OU-1 in one order. In addition, the Order contemplates the preparation of a Combined Remedial Action Plan (the "Combined RAP"), which would include the RAPs for both OUs in one document.

Public participation is required by DTSC for the remediation. Public participation activities include public notifications and informational materials, such as fact sheets and work notices; public meetings; publication of decision documents; posting of information on DTSC's web site; and maintenance of information repositories.

In addition to DTSC, other stakeholder agencies will be involved in the review of the Remedial Action Plan (RAP) through the California Environmental Quality Act (CEQA) process. These agencies include the San Francisco Regional Water Quality Control Board, the City and County of San Francisco, the City of Brisbane and San Mateo County.

3.2 Summary of Remedial Approach for the Schlage OU

The overall remedial approach for the Schlage OU is to apply proven and aggressive remedial technologies to the property to achieve the cleanup necessary for planned redevelopment. The regulatory processes for preparation of work plans, implementation of remedial actions, and public communication will comply with National Contingency Plan (NCP) procedures. In summary, planned activities at the property are to:

- Demolish existing buildings.
- Conduct a Data Gap Investigation to evaluate how effective the SVE system has been in reducing source CVOC concentrations in soil, as well as to further characterize key areas of the site.

- Conduct a treatability test to support the selection and design of groundwater remedial technologies.
- Prepare a Feasibility Study, Combined RAP and other remediation documents for submission to DTSC.
- Obtain approval for the RAP, prepare Remedial Design documents, and implement soil and groundwater remediation. The remedial approach for soil that is being evaluated and likely will be proposed in the RAP is to excavate soil to effect complete remediation to rough development grades, under a Soil Management Plan with the following assumptions:
    - Excavation and off-site disposal of highly contaminated source soils
    - Excavation and on-site treatment of moderately impacted soils
    - Excavation and unrestricted on-site reuse of clean soils.

  The remedial approach that is being evaluated for groundwater is active treatment by injection of chemical reactants (either oxidative, reductive, or a combination of both).
- Perform operation, maintenance and monitoring (O&M) activities as necessary following implementation of active remediation.

3.3 Facility Demolition

There are several buildings on the Schlage property consisting of approximately 500,000 total square feet that will be demolished in preparation for site remediation and redevelopment. These buildings include Plant 1, Plant 1X, Plant 2, Plant 2X, Plant 3, Plant 3X, Schlage Office Building, Security Office, Equipment and Hazardous Material Storage Building. One historically protected building, the Old Office Building, is located on the property and will not be demolished.

During demolition activities, the existing buildings and associated infrastructure will be removed including slabs, footings, and utilities. Asbestos-containing building material, lead based paint and other regulated building materials will be abated in accordance with California State rules and regulations by a licensed abatement contractor prior to demolition. All necessary permits will be obtained prior to abatement and demolition activities.

Building foundation slabs, piers and footings will be removed after the structures are demolished. Foundations adjacent to sidewalks will be removed in a manner that protects the integrity of the sidewalks. Underground utilities will be disconnected and/or capped at the property line.

It is the goal to reuse and recycle as much of the acceptable building materials as possible. Acceptable concrete and masonry demolition debris will be crushed into Class II base-rock and will be stockpiled onsite for use as backfill. Up to 55,000 tons of recycled concrete may be left onsite to the extent there is sufficient stockpile space. Salvageable metals extracted from demolished buildings will be transported to a metals recycling facility.

Site control measures that will be implemented during demolition activities to ensure public safety include dust control, air monitoring, and sidewalk closure. Access to the property will be controlled by privacy security fencing and on-site security will restrict access to the property during nights and weekends until demolition is completed.

A Soil Management Plan will be developed to provide guidance for handling excavation spoils during demolition, remediation and redevelopment. The Soil Management Plan will include procedures for excavation management, segregation and stockpiling of soils, profiling stockpiled soils, and classifying soil for on-site reuse or off-site disposal. The Soil Management Plan will be updated as remediation progresses in accordance with the final RAP.

3.4 Data Gap Investigation

As described in Section 2.7, multiple phases of investigation and remediation have taken place on the site over the years. A decline in CVOC concentrations has been observed in soil vapor extracted from the SVE wells, as well as in groundwater near the former degreaser sump area. To confirm that this represents a reduction in CVOC concentrations in vadose zone soils as a result of the SVETS operation, an additional investigation is taking place at and near the former degreaser sump (i.e., the residual source area). Depth discrete soil and groundwater samples have been collected in the fill and A-Sand in the source area to verify CVOC concentrations.

3.5 Treatability/Pilot Testing of ISCO and ERD

In-situ chemical oxidation (ISCO) and enhanced reductive dechlorination (ERD) are being considered as possible groundwater treatment technologies to remediate the dissolved CVOCs in the fill, A-Sand and B-Sand. In order to confirm their effectiveness, and to obtain site-specific information on parameters needed for final design, a short term pilot and treatability test is being conducted for ISCO using modified Fenton's reagent and ERD using sodium lactate. Details of these two technologies are provided in Section 3.7, Groundwater Remediation.

ISCO pilot testing is being conducted in the former degreaser sump area (the area with the most elevated CVOC concentrations in groundwater). ERD pilot testing is being conducted in areas of moderate CVOC concentrations. A treatability/pilot test work plan was submitted to and approved by DTSC prior to the start of any pilot test activities. Two to three rounds of injections are planned for the pilot test, with periodic water level measurements and groundwater quality monitoring.

Data collected will be used to evaluate extraction/injection rates, radius of extraction/injection influence, effectiveness of CVOC degradation and/or mass removal, and rates of CVOC degradation. The final remedial design and implementation plan for the groundwater treatment will be based on the results of the pilot tests. A report of the treatability study will be submitted to DTSC for approval prior to the implementation of the full-scale systems.

3.6 Soil Remediation

The total amount of soil to be excavated or otherwise moved for both remediation and grading of the site is estimated at approximately 45,000 cubic yards. All procedures for the excavation, handling, and characterization of soil, as well as the criteria for deciding what soil is clean and suitable for unrestricted use, what soil must be treated on-site to achieve cleanup standards, and what soil must be removed from site will be contained in a Soil Management Plan, as described above.

The first soil excavation will be in those areas of highest residual soil CVOC concentrations. These soils will be excavated and disposed of off-site. This includes an estimated 4,000 cubic yards from "hot spot" locations associated with the former degreaser and solvent cleaning operations near Plant 3X, and approximately 2,000 cubic yards in the area where the SVE system presently operates. Additional impacted soil may be discovered underlying existing building slabs after the buildings are demolished.

Following removal of the soil with the highest CVOC concentrations, the remainder of the excavation and grading will take place. During this stage, soils that exceed the groundwater protection standard of 700 ppb of PCE, but are otherwise not contaminated enough to require off-site disposal, will be treated on-site. Treatment options will be evaluated in the Feasibility Study, but are expected to include on-site soil aeration and ex-situ soil vapor extraction. The goal is to reduce VOC levels sufficiently so that the soil can be re-used on-site, either as unrestricted fill or in designated areas, depending on the residual CVOC concentrations.

3.7 Groundwater Remediation

Based on existing site characterization data, two remedial technologies are being considered for groundwater treatment. Both will be evaluated through the Feasibility Study and RAP process. These remedial technologies have been discussed with DTSC and agreement has been reached that these are appropriate remedial approaches to consider for cleanup of the site. Further, these remedial technologies have been implemented successfully at similar sites in California and have been accepted by DTSC.

The two groundwater treatment technologies being evaluated are: in-situ chemical oxidation (ISCO) and enhanced reductive dechlorination (ERD). ISCO is a more aggressive treatment technology but has the advantage of being capable of removing higher levels of contaminants faster. ISCO is expected to be used selectively in areas with higher, source-level concentrations of CVOCs and in areas where the redevelopment schedule demands a faster reduction in CVOC concentrations. ERD is a less expensive treatment technology and has the advantage of stabilizing metals, but it is slower than ISCO and may be less effective in areas of high CVOC concentrations.

The effectiveness of both treatment technologies for use at Schlage is being evaluated in a treatability study, as described in Section 3.5, above. The results of the treatability study will be used in the RAP process to evaluate both technologies for recommended application on the site. A more detailed description of the technologies follows:

- **In Situ Chemical Oxidation (ISCO) using modified Fenton's reagent**
  Chemical oxidation technologies have shown the most promise in quickly reducing source VOC concentrations at sites with similar geologic settings. Fenton's reagent is a combination of a soluble iron catalyst and hydrogen peroxide that produces hydroxyl radicals, which are powerful, short-lived oxidizers. The strong oxidizers produced during Fenton's reactions are relatively non-selective and can destroy a wide-range of VOCs. Based on the use of ISCO at similar sites in the Bay Area, it is believed that ISCO likely will be effective in reducing the high CVOC concentrations within the fill and the A-Sand north of Sunnydale Avenue.

- **Enhanced Reductive Dechlorination (ERD) using sodium lactate**
  Enhanced reductive dechlorination is the sequential replacement of chlorine atoms with hydrogen as the CVOCs are used as electron acceptors by indigenous microorganisms. Dechlorination is typically enhanced through the injection of electron donors, such as sodium

lactate, hydrogen release compounds (HRCs), edible oil, or molasses, all of which provide carbon and other nutrients needed to promote microbial activity. In the presence of adequate carbon, microorganisms use CVOCs as electron acceptors, which results in breakdown of CVOCs. Injection of these substrates, particularly sodium lactate, has been shown to be effective in reducing dissolved-phase CVOC concentrations approaching 100 mg/L. The breakdown of CVOCs is, however, sequential and is typically much slower than that of the modified Fenton's reagent process. Because sodium lactate is completely soluble in water and provides a stronger carbon source than other commercially available products (such as HRCs, edible oil, and molasses), it is being used as the carbon source for the ERD treatability study.

Because of the relative merits of the two technologies, it is expected that ERD will be proposed for use in down-gradient portions of the plume and areas with lower CVOC concentrations (the A-Sand south of Sunnydale Avenue, and B-Sand site-wide), and ISCO will be proposed in the former degreaser sump source area. The results of the treatability study will be used to make the final determinations.

3.8 Operation, Maintenance and Monitoring (O&M)

Soil Vapor Extraction and Groundwater Extraction Treatment Systems:

Given the long-term operation of the SVETS and near-asymptotic CVOC removal rates over the last several years, it appears that the existing system is no longer effective in removing CVOC mass. Therefore, operation of the SVETS was not recommended as part of the continued remediation strategy. This recommendation was made to DTSC, and a request submitted that the system be shut down. It is anticipated that DTSC will approve the discontinuation of the SVETS in September 2008.

The existing GWETS system will remain in place until active groundwater treatment begins. Once treatability studies demonstrate that the proposed technologies are capable of remediating VOC-affected groundwater, a work plan for decommissioning the GWETS will be submitted to DTSC. The SWETS was temporarily shut down in August 2008 in order to implement the groundwater remediation treatability study. Because the contemplated remediation approach to the site does not include continued implementation of groundwater pump and treat technologies, it is not anticipated that the GWETS will be reactivated other than for processing groundwater recovered during well construction or monitoring activities.

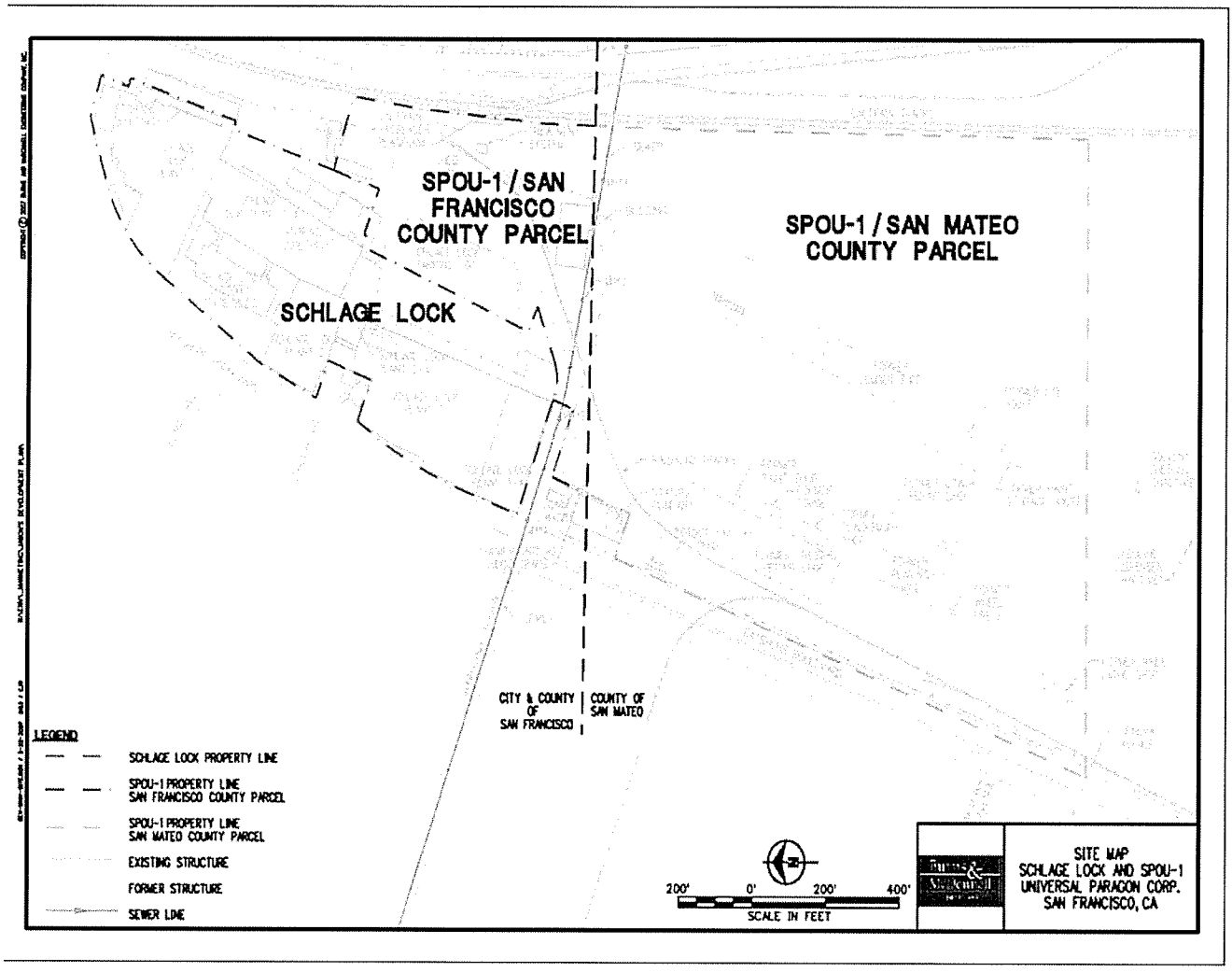
Operation of the SVETS will continue until DTSC approves cessation of the system, the system's operation monitoring, maintenance, and monthly performance reporting will also continue.

Groundwater Monitoring and Reporting:

Groundwater performance monitoring will be conducted within the treatment zones during the pilot test. Results of the performance monitoring will be included in the final treatability study report. In addition, routine quarterly groundwater monitoring will continue until the groundwater has been remediated and closure is granted by DTSC. The current quarterly groundwater monitoring program includes measurement of water levels in 78 onsite wells and collection of groundwater samples from 26 wells for laboratory testing. It is expected that groundwater monitoring will continue take place for at least ten years, or until remedial goals have been achieved and the site is closed by DTSC.

Figure 1

SITE MAP



APPENDIX 4.5

SUPPLEMENTAL TRANSPORTATION ANALYSIS INFORMATION

This appendix includes the following additional transportation analysis items prepared by the EIR consultants in response to comments received on the DEIR:

- a roadway system impacts and mitigation summary table prepared in response to comments RC 6.01 and LR 6.13;
- an intersection lane configuration and signal timing plan for the Blanken Avenue/Tunnel Avenue intersection in response to comment LR 9.02 (MTA);
- intersection level of service analysis output tables for the Blanken Avenue/Tunnel Avenue intersection in response to comment LR 9.02 (MTA); and
- truck turning movement queuing analysis output for the Bayshore Boulevard/Blanken Avenue and Blanken Avenue/Tunnel Avenue intersections in response to comment LR 9.01 (MTA).

None of these added analyses has identified a new impact not identified in the DEIR, a substantial increase in the severity of an impact identified in the DEIR, or a new mitigation requirement.

VISITACION VALLEY REDEVELOPMENT PROGRAM--DEIR-IDENTIFIED ROADWAY SYSTEM IMPACTS AND MITIGATION SUMMARY

Impacts	Mitigations Existing Plus Project	2025 Cumulative Growth Plus Project	2025 Cumulative Growth Plus Project with Planned Regional Roadway Improvements
Study Intersections:			
1--Bayshore Blvd./Tunnel Ave. (signalized)	*Impact:* AM--LOS B to B (insignificant) PM--LOS B to B (insignificant) *Mitigation:* None required.	*Impact:* AM--LOS B to E; 14.0% project contribution (significant) PM--LOS B to D (insignificant) *Mitigation:* Modify signal timing (shift one second from SB left-turn to NB/SB through movements); coordinate with transit and pedestrian signalization requirements along Bayshore.	*Impact:* AM--LOS B to E; 27.7% contribution (significant) PM--LOS B to D (insignificant) *Mitigation:* Implement actions listed for 2025 cumulative plus project.
2--Bayshore Blvd./Blanken Ave. (signalized)	*Impact:* AM--LOS B to F (significant) PM--LOS B to C (insignificant) *Mitigation:* Restripe WB approach to create two additional lanes, one added left-turn and one added right turn; coordinate PM signal phasing, signage, ped. crosswalk lights, etc., to assist pedestrians to Muni T-line platform on Bayshore at Blanken. Also require applicant preparation and implementation of Transportation Management Plans (TMPs). Impact remains significant with these mitigations--i.e., significant unavoidable impact.	*Impact:* AM--LOS B to F (significant) PM--LOS B to F (significant) *Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Impact:* AM--LOS B to F (significant) PM--LOS B to F (significant) *Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.
3--Bayshore Blvd./Arleta Ave./San Bruno Ave. (signalized)	*Impact:* AM--LOS C to D (insignificant) PM--LOS C to F (significant) *Mitigation:* AM--None required. PM--Modify PM signal timing (shift 6 seconds from NB left-turn to SB through movement). To avoid associated impacts on transit operations, include bus prioritization in left-turn signal movement. Also require applicant preparation and implementation of TMPs. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Impact:* AM--LOS C to F; 27.5% project contribution (significant) PM--LOS C to F; 29.8% project contribution (significant) *Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Impact:* AM--LOS C to C (insignificant) PM--LOS C to E (significant) *Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.

VISITACION VALLEY REDEVELOPMENT PROGRAM--DEIR-IDENTIFIED ROADWAY SYSTEM IMPACTS AND MITIGATION SUMMARY (continued)

Impacts	Mitigations: Existing Plus Project	2025 Cumulative Growth Plus Project	2025 Cumulative Growth Plus Project with Planned Regional Roadway Improvements
Study Intersections:			
4--Bayshore Blvd./Leland Ave. (signalized)	*Impact:* AM--LOS C to F (significant) PM--LOS C to F (significant)	*Impact:* AM--LOS C to F; 28% project contribution (significant) PM--LOS C to F; 33% project contribution (significant)	*Impact:* AM--LOS C to F (significant) PM--LOS C to F (significant)
	Mitigation: Eliminate proposed SB Bayshore left-turn lane. Require applicant preparation and implementation of TMPs. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant and unavoidable impact.
5--Bayshore Blvd./Visitacion Ave. (signalized)	*Impact:* AM--LOS C to F (significant), and inadequate SB left-turn pocket length. PM--LOS B to D (insignificant), and inadequate SB left-turn pocket length.	*Impact:* AM--LOS C to F; 27% project contribution (significant) PM--LOS B to F; 20% project contribution (significant)	*Impact:* AM--LOS C to E (significant) PM--LOS B to D (insignificant)
	Mitigation: Require applicant preparation/Implementation of TMPs. Add 80 ft. to SB left-turn pocket. Operational and left-turn pocket impacts remain significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.
6--Bayshore Blvd./Sunnydale Ave. (signalized)	*Impact:* AM--LOS C to F (significant), and inadequate SB left-turn pocket length. PM--LOS C to D (insignificant), and inadequate SB left-turn pocket length.	*Impact:* AM--LOS C to F; 19% project contribution (significant) PM--LOS C to F; 24% project contribution (significant)	*Impact:* AM--LOS C to F (significant) PM--LOS C to D (insignificant)
	Mitigation: Require applicant preparation/implementation of TMPs. Impacts remain significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.
7--Leland Ave./Rutland (all-way-stop)	*Impact:* AM--LOS A to A (insignificant) PM--LOS A to B (insignificant)	*Impact:* AM--LOS A to C; 28% project contribution (insignificant) PM--LOS A to B; 32% project contribution (insignificant)	*Impact:* AM--LOS A to B (insignificant) PM--LOS A to B (insignificant)
	Mitigation: None required.	*Mitigation:* None required.	*Mitigation:* None required.

VISITACION VALLEY REDEVELOPMENT PROGRAM--DEIR-IDENTIFIED ROADWAY SYSTEM IMPACTS AND MITIGATION SUMMARY (continued)

Impacts	Mitigations: Existing Plus Project	2025 Cumulative Growth Plus Project	2025 Cumulative Growth Plus Project with Planned Regional Roadway Improvements
Study Intersections:			
8--Tunnel Ave./Blanken Ave. (all-way-stop)	*Impact:* AM--LOS B to F (significant) PM--LOS A to C (insignificant) *Mitigation:* Signalize the intersection. Also, require applicant preparation/implementation of TMPs.	*Impact:* AM--LOS B to F; 15% project contribution (significant) PM--LOS A to F; 15% project contribution (significant) *Mitigation:* Implement actions listed for Existing Plus Project. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	*Impact:* AM--LOS B to E (significant) PM--LOS A to D (insignificant) *Mitigation:* Signalize this intersection.
9--Alana Way/Beatty Ave. (all-way-stop)	*Impact:* AM--LOS B to F (insignificant; does not meet peak hr. signal warrant) PM--LOS B to C (insignificant) *Mitigation:* None required.	*Impact:* AM--LOS B to F; 8% project contribution (significant) PM--LOS B to F; 10% project contribution (significant) *Mitigation:* Signalize; restripe SB Alana approach to create three lanes--one EB left-turn, one SB through and one WB right-turn lane; and restripe EB Beatty approach to create two lanes--one NB left-turn and one shared EB through and SB right-turn lane. Impact remains significant with this mitigation--i.e., significant unavoidable impact.	Intersection reconstructed with proposed Geneva Avenue extension; no significant project impact; no project mitigation required.
10--Alana Way/Harney Way/Thomas Mellon Dr.	*Impact:* AM--LOS B to C (insignificant) PM--LOS B to C (insignificant) *Mitigation:* None required.	Reconfiguration of existing Alana Way/Harney Way/Thomas Mellon Dr. intersection (intersection 10) to create two intersections--Thomas Mellon Dr./Harney Way (intersection 11) and Harney Way/Alana Way (intersection 12)--is anticipated to occur by 2025 as part of the Executive Park project. See findings for intersections 11 and 12 below.	Intersection 10 reconfigured with Executive Park project to create intersections 11 and 12. See findings for intersections 11 and 12 below.
11--Thomas Mellon Dr./Harney Way	Not an existing intersection. Reconfiguration of existing Alana Way/Harney Way/Thomas Mellon Dr. intersection (intersection 10) to create two intersections--Thomas Mellon Dr./Harney Way (intersection 11) and Harney Way/Alana Way (intersection 12)--is anticipated to occur by 2025 as part of the Executive Park project.	*Impact:* AM--LOS B to C; 1% project contribution (insignificant) PM--LOS B to C; 0% project contribution (insignificant) *Mitigation:* None required.	*Impact:* AM--LOS B to E; <1% project contribution (insignificant) PM--LOS B to D (insignificant) *Mitigation:* None required.
12-- Harney Way/Alana Way	Not an existing intersection. Reconfiguration of existing Alana Way/Harney Way/Thomas Mellon Dr. intersection (intersection 10) to create two intersections--Thomas Mellon Dr./Harney Way (intersection 11) and Harney Way/Alana Way (intersection 12)--is anticipated to occur by 2025 as part of the Executive Park project.	*Impact:* AM--LOS B to F; 2% project contribution (insignificant) PM--LOS B to F; 0% project contribution (insignificant) *Mitigation:* None required.	Intersection reconstructed with proposed Geneva Avenue extension; no significant project impact; no project mitigation required.

VISITACION VALLEY REDEVELOPMENT PROGRAM--DEIR-IDENTIFIED ROADWAY SYSTEM IMPACTS AND MITIGATION SUMMARY (continued)

Impacts	Mitigations: Existing Plus Project	2025 Cumulative Growth Plus Project	2025 Cumulative Growth Plus Project with Planned Regional Roadway Improvements
Study Freeway Segments:			
▪ **U.S. 101 NB and SB btwn. I-280 and Third St.**	*Impacts:* AM northbound--LOS D to E (significant) AM southbound--LOS E to E (significant project contribution) PM northbound--LOS E to E (significant project contribution) PM southbound--LOS D to D (insignificant) *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.	*Impacts:* AM northbound--LOS D to F (significant) AM southbound--LOS E to F (significant) PM northbound--LOS E to F (significant) PM southbound--LOS D to F (significant) *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.	*Impacts:* AM northbound--LOS D to F (significant) AM southbound--LOS E to F (significant) PM northbound--LOS E to F (significant) PM southbound--LOS D to F (significant) *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.
▪ **U.S. 101 NB and SB btwn. Sierra Dr. Parkway and I-380**	*Impacts:* AM northbound--LOS D to E (significant) AM southbound--LOS F to F (insignificant project contribution) PM northbound--LOS F to F (insignificant project contribution) PM southbound--LOS E to E (insignificant project contribution) *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.	*Impact:* AM northbound--LOS D to F (significant) AM southbound--LOS F to F (significant project contribution) PM northbound--LOS F to F (significant project contribution)[1] PM southbound--LOS E to F (significant project contribution)[1] *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.	*Impact:* AM northbound--LOS D to F (significant) AM southbound--LOS F to F (significant project contribution)[1] PM northbound--LOS F to F (significant project contribution)[1] PM southbound--LOS E to F (significant project contribution)[1] *Mitigation:* Additional mainline capacity would be necessary to mitigate impacts. This mitigation infeasible due to physical, jurisdictional and cost considerations; thus significant unavoidable impact.
Study Freeway On-Ramps:			
▪ **U.S. 101 NB On-Ramp from Bayshore Blvd./Third St.**	*Impacts:* No significant operational impact. *Mitigation:* None required	*Impacts:* AM--LOS C to F (significant) PM--LOS C to C (insignificant) *Mitigation:* Impact will be mitigated by anticipated construction of new ramps at Geneva Avenue.	*Impacts:* AM--LOS C to C (insignificant) PM--LOS C to C (insignificant) *Mitigation:* None required.

[1] LOS E or F (unacceptable operation) would occur with and without Project; substantial project contribution to cumulative growth.

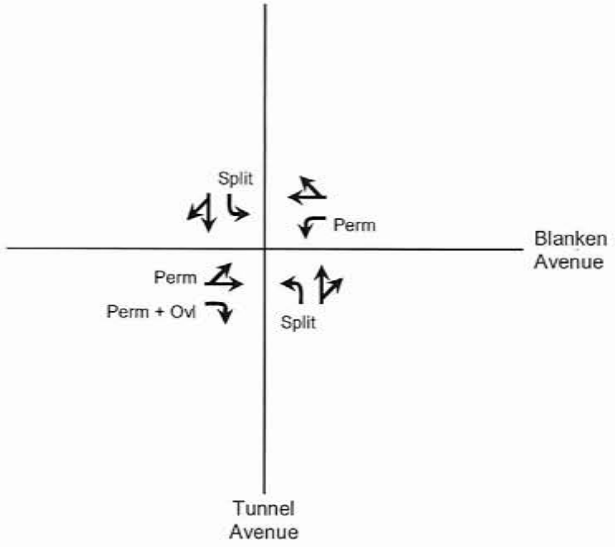
VISITACION VALLEY REDEVELOPMENT PROGRAM--DEIR-IDENTIFIED ROADWAY SYSTEM IMPACTS AND MITIGATION SUMMARY (continued)

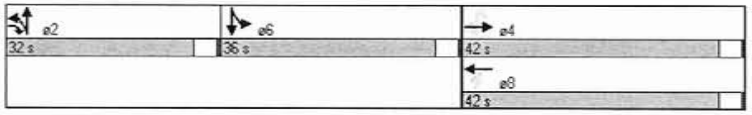
Impacts	Mitigations: Existing Plus Project	2025 Cumulative Growth Plus Project	2025 Cumulative Growth Plus Project with Planned Regional Roadway Improvements
Study Freeway On-Ramps:			
▪ **U.S. 101 NB On-Ramp from Harney Way**	*Impacts:* No significant operational impact. *Mitigation:* None required	*Impacts:* AM--LOS C to C (insignificant) PM--LOS D to F (significant) *Mitigation:* Impact will be mitigated by anticipated construction of new ramps at Geneva Avenue.	*Impacts:* AM--LOS C to F (insignificant project contribution)[2] PM--LOS D to F (insignificant project contribution)[2] *Mitigation:* None required
▪ **U.S. 101 SB On-Ramp from Beatty Ave./Alana Way**	*Impacts:* No significant operational impact. *Mitigation:* None required	*Impacts:* AM--LOS F to F (significant project contribution)[1] PM--LOS C to F (significant) *Mitigation:* Impact will be mitigated by anticipated construction of new ramps at Geneva Avenue.	*Impact:* AM--LOS F to F (insignificant project contribution)[2] PM--LOS C to F (insignificant project contribution)[2] *Mitigation:* None required

[1] LOS E or F (unacceptable operation) would occur with and without Project; substantial project contribution to cumulative growth.
[2] LOS E or F (unacceptable operation) would occur with and without Project; unsubstantial project contribution to cumulative growth.

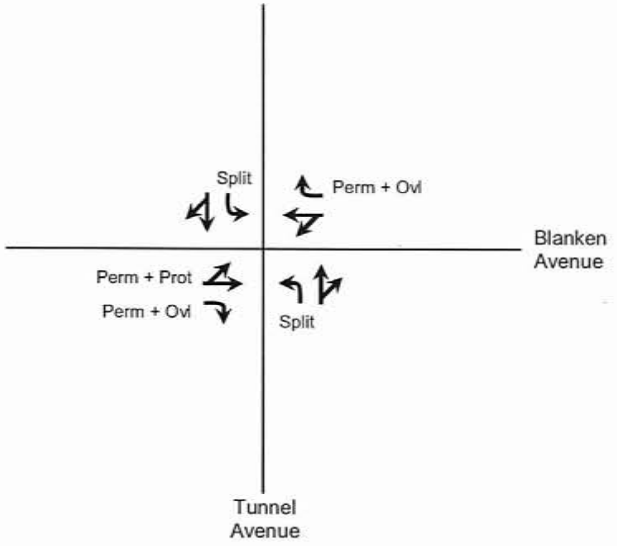
Figure 1: Tunnel Avenue / Blanken Avenue – Lane Configuration and Signal Timing Plan

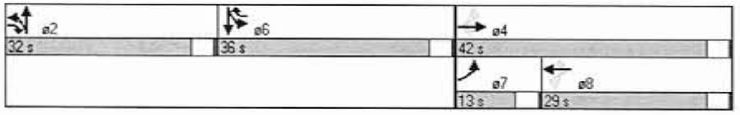
Without Transportation Improvements





With Transportation Improvements





Intersection Level of Service Output

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	16	109	459	8	78	79	131	169	13	54	97	13
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0	8.0	8.0		8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00	1.00	1.00		1.00	1.00		1.00	1.00	
Frt		1.00	0.85	1.00	0.92		1.00	0.99		1.00	0.98	
Flt Protected		0.99	1.00	0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1851	1583	1770	1722		1770	1843		1770	1830	
Flt Permitted		0.71	1.00	0.67	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1326	1583	1239	1722		1770	1843		1770	1830	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	17	118	499	9	85	86	142	184	14	59	105	14
RTOR Reduction (vph)	0	0	148	0	44	0	0	1	0	0	6	0
Lane Group Flow (vph)	0	135	351	9	127	0	142	197	0	59	113	0
Turn Type	Perm		pm+ov	Perm			Split			Split		
Protected Phases		4	2		8		2	2		6	6	
Permitted Phases	4		4	8								
Actuated Green, G (s)		14.3	85.3	14.3	14.3		71.0	71.0		12.7	12.7	
Effective Green, g (s)		10.3	77.3	10.3	10.3		67.0	67.0		8.7	8.7	
Actuated g/C Ratio		0.09	0.70	0.09	0.09		0.61	0.61		0.08	0.08	
Clearance Time (s)		4.0	4.0	4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		124	1228	116	161		1078	1123		140	145	
v/s Ratio Prot			c0.17		0.07		0.08	0.11		0.03	c0.06	
v/s Ratio Perm		c0.10	0.05	0.01								
v/c Ratio		1.09	0.29	0.08	0.79		0.13	0.18		0.42	0.78	
Uniform Delay, d1		49.8	6.1	45.5	48.8		9.1	9.4		48.3	49.7	
Progression Factor		1.07	3.66	1.00	1.00		1.00	1.00		0.48	0.49	
Incremental Delay, d2		52.2	0.0	0.3	22.8		0.3	0.3		1.8	21.4	
Delay (s)		105.3	22.3	45.8	71.6		9.4	9.7		25.2	45.7	
Level of Service		F	C	D	E		A	A		C	D	
Approach Delay (s)		40.0			70.3			9.6			38.9	
Approach LOS		D			E			A			D	

Intersection Summary			
HCM Average Control Delay	36.2	HCM Level of Service	D
HCM Volume to Capacity ratio	0.40		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	16.0
Intersection Capacity Utilization	65.7%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	6	70	291	6	128	59	248	122	7	90	45	10
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0	8.0	8.0		8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00	1.00	1.00		1.00	1.00		1.00	1.00	
Frt		1.00	0.85	1.00	0.95		1.00	0.99		1.00	0.97	
Flt Protected		1.00	1.00	0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1855	1583	1770	1775		1770	1847		1770	1812	
Flt Permitted		0.95	1.00	0.70	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1761	1583	1310	1775		1770	1847		1770	1812	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	7	76	316	7	139	64	270	133	8	98	49	11
RTOR Reduction (vph)	0	0	92	0	19	0	0	1	0	0	9	0
Lane Group Flow (vph)	0	83	224	7	184	0	270	140	0	98	51	0
Turn Type	Perm		pm+ov	Perm			Split			Split		
Protected Phases		4	2		8		2	2		6	6	
Permitted Phases	4		4	8								
Actuated Green, G (s)		16.8	85.9	16.8	16.8		69.1	69.1		12.1	12.1	
Effective Green, g (s)		12.8	77.9	12.8	12.8		65.1	65.1		8.1	8.1	
Actuated g/C Ratio		0.12	0.71	0.12	0.12		0.59	0.59		0.07	0.07	
Clearance Time (s)		4.0	4.0	4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		205	1236	152	207		1048	1093		130	133	
v/s Ratio Prot			0.11		c0.10		c0.15	0.08		c0.06	0.03	
v/s Ratio Perm		0.05	0.03	0.01								
v/c Ratio		0.40	0.18	0.05	0.89		0.26	0.13		0.75	0.38	
Uniform Delay, d1		45.1	5.4	43.2	47.9		10.8	9.9		50.0	48.6	
Progression Factor		1.01	3.03	1.00	1.00		1.00	1.00		0.56	0.48	
Incremental Delay, d2		0.6	0.0	0.1	33.3		0.6	0.2		20.4	1.7	
Delay (s)		46.0	16.3	43.3	81.2		11.4	10.2		48.3	25.0	
Level of Service		D	B	D	F		B	B		D	C	
Approach Delay (s)		22.5			79.9			11.0			39.5	
Approach LOS		C			E			B			D	

Intersection Summary			
HCM Average Control Delay	31.0	HCM Level of Service	C
HCM Volume to Capacity ratio	0.40		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	24.0
Intersection Capacity Utilization	56.7%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	26	287	794	215	257	217	1097	246	36	108	189	20
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0	8.0	8.0		8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00	1.00	1.00		1.00	1.00		1.00	1.00	
Frt		1.00	0.85	1.00	0.93		1.00	0.98		1.00	0.99	
Flt Protected		1.00	1.00	0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1855	1583	1770	1735		1770	1827		1770	1836	
Flt Permitted		0.79	1.00	0.45	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1465	1583	837	1735		1770	1827		1770	1836	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	28	312	863	234	279	236	1192	267	39	117	205	22
RTOR Reduction (vph)	0	0	135	0	25	0	0	4	0	0	4	0
Lane Group Flow (vph)	0	340	728	234	490	0	1192	302	0	117	223	0
Turn Type	Perm		pm+ov	Perm			Split			Split		
Protected Phases		4	2		8		2	2		6	6	
Permitted Phases	4		4	8								
Actuated Green, G (s)		45.4	79.3	45.4	45.4		33.9	33.9		18.7	18.7	
Effective Green, g (s)		41.4	71.3	41.4	41.4		29.9	29.9		14.7	14.7	
Actuated g/C Ratio		0.38	0.65	0.38	0.38		0.27	0.27		0.13	0.13	
Clearance Time (s)		4.0	4.0	4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		551	1141	315	653		481	497		237	245	
v/s Ratio Prot			0.17		c0.28		c0.67	0.17		0.07	c0.12	
v/s Ratio Perm		0.23	0.29	0.28								
v/c Ratio		0.62	0.64	0.74	0.75		2.48	0.61		0.49	0.91	
Uniform Delay, d1		27.9	11.6	29.7	29.8		40.1	34.9		44.2	47.0	
Progression Factor		0.46	2.40	1.00	1.00		1.00	1.00		0.58	0.61	
Incremental Delay, d2		0.2	0.1	9.1	4.8		671.4	5.4		1.2	27.8	
Delay (s)		13.1	27.9	38.8	34.7		711.4	40.4		27.1	56.4	
Level of Service		B	C	D	C		F	D		C	E	
Approach Delay (s)		23.7			36.0			574.4			46.4	
Approach LOS		C			D			F			D	

Intersection Summary			
HCM Average Control Delay	245.6	HCM Level of Service	F
HCM Volume to Capacity ratio	1.38		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	24.0
Intersection Capacity Utilization	141.9%	ICU Level of Service	H
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	7	520	1061	124	229	160	588	194	111	301	150	12
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0	8.0	8.0		8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00	1.00	1.00		1.00	1.00		1.00	1.00	
Frt		1.00	0.85	1.00	0.94		1.00	0.95		1.00	0.99	
Flt Protected		1.00	1.00	0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1861	1583	1770	1748		1770	1761		1770	1842	
Flt Permitted		0.99	1.00	0.18	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1850	1583	336	1748		1770	1761		1770	1842	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	8	565	1153	135	249	174	639	211	121	327	163	13
RTOR Reduction (vph)	0	0	197	0	21	0	0	19	0	0	3	0
Lane Group Flow (vph)	0	573	956	135	402	0	639	313	0	327	173	0
Turn Type	Perm		pm+ov	Perm			Split			Split		
Protected Phases		4	2		8		2	2		6	6	
Permitted Phases	4		4	8								
Actuated Green, G (s)		44.7	72.7	44.7	44.7		28.0	28.0		25.3	25.3	
Effective Green, g (s)		40.7	64.7	40.7	40.7		24.0	24.0		21.3	21.3	
Actuated g/C Ratio		0.37	0.59	0.37	0.37		0.22	0.22		0.19	0.19	
Clearance Time (s)		4.0	4.0	4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		685	1046	124	647		386	384		343	357	
v/s Ratio Prot			0.20		0.23		c0.36	0.18		c0.18	0.09	
v/s Ratio Perm		0.31	0.40	c0.40								
v/c Ratio		0.84	0.91	1.09	0.62		1.66	0.82		0.95	0.48	
Uniform Delay, d1		31.6	20.2	34.6	28.4		43.0	40.9		43.9	39.5	
Progression Factor		0.48	2.19	1.00	1.00		1.00	1.00		0.64	0.58	
Incremental Delay, d2		0.9	1.4	106.6	1.9		306.3	17.2		6.7	0.1	
Delay (s)		16.2	45.4	141.3	30.2		349.3	58.1		34.9	23.1	
Level of Service		B	D	F	C		F	E		C	C	
Approach Delay (s)		35.7			57.1			249.7			30.8	
Approach LOS		D			E			F			C	

Intersection Summary			
HCM Average Control Delay	93.5	HCM Level of Service	F
HCM Volume to Capacity ratio	1.21		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	24.0
Intersection Capacity Utilization	117.4%	ICU Level of Service	H
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	26	177	149	13	95	363	45	195	20	120	161	20
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0		8.0	8.0	8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00		1.00	1.00	1.00	1.00		1.00	1.00	
Frt		1.00	0.85		1.00	0.85	1.00	0.99		1.00	0.98	
Flt Protected		0.99	1.00		0.99	1.00	0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1851	1583		1852	1583	1770	1836		1770	1832	
Flt Permitted		0.94	1.00		0.84	1.00	0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1746	1583		1557	1583	1770	1836		1770	1832	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	28	192	162	14	103	395	49	212	22	130	175	22
RTOR Reduction (vph)	0	0	56	0	0	291	0	2	0	0	5	0
Lane Group Flow (vph)	0	220	106	0	117	104	49	232	0	130	192	0
Turn Type	pm+pt		pm+ov	Perm		pm+ov	Split			Split		
Protected Phases	7	4	2		8	6	2	2		6	6	
Permitted Phases	4		4	8		8						
Actuated Green, G (s)		19.1	80.2		19.1	36.9	61.1	61.1		17.8	17.8	
Effective Green, g (s)		15.1	72.2		15.1	28.9	57.1	57.1		13.8	13.8	
Actuated g/C Ratio		0.14	0.66		0.14	0.26	0.52	0.52		0.13	0.13	
Clearance Time (s)		4.0	4.0		4.0	4.0	4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0		3.0	3.0	3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		240	1154		214	531	919	953		222	230	
v/s Ratio Prot			0.05			0.02	0.03	c0.13		0.07	c0.10	
v/s Ratio Perm		c0.13	0.02		0.08	0.04						
v/c Ratio		0.92	0.09		0.55	0.20	0.05	0.24		0.59	0.83	
Uniform Delay, d1		46.8	6.9		44.3	31.5	13.1	14.6		45.4	47.0	
Progression Factor		0.95	1.99		1.00	1.00	1.00	1.00		0.60	0.61	
Incremental Delay, d2		17.4	0.0		2.8	0.2	0.1	0.6		3.2	18.5	
Delay (s)		61.7	13.8		47.1	31.7	13.2	15.2		30.5	47.0	
Level of Service		E	B		D	C	B	B		C	D	
Approach Delay (s)		41.4			35.2			14.8			40.5	
Approach LOS		D			D			B			D	

Intersection Summary			
HCM Average Control Delay	34.1	HCM Level of Service	C
HCM Volume to Capacity ratio	0.46		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	24.0
Intersection Capacity Utilization	65.7%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	7	104	96	9	183	220	36	149	8	338	70	12
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		8.0	8.0		8.0	8.0	8.0	8.0		8.0	8.0	
Lane Util. Factor		1.00	1.00		1.00	1.00	1.00	1.00		1.00	1.00	
Frt		1.00	0.85		1.00	0.85	1.00	0.99		1.00	0.98	
Flt Protected		1.00	1.00		1.00	1.00	0.95	1.00		0.95	1.00	
Satd. Flow (prot)		1857	1583		1858	1583	1770	1848		1770	1822	
Flt Permitted		0.95	1.00		0.98	1.00	0.95	1.00		0.95	1.00	
Satd. Flow (perm)		1775	1583		1827	1583	1770	1848		1770	1822	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	8	113	104	10	199	239	39	162	9	367	76	13
RTOR Reduction (vph)	0	0	45	0	0	158	0	1	0	0	6	0
Lane Group Flow (vph)	0	121	59	0	209	81	39	170	0	367	83	0
Turn Type	pm+pt		pm+ov	Perm		pm+ov	Split			Split		
Protected Phases	7	4	2		8	6	2	2		6	6	
Permitted Phases	4		4	8		8						
Actuated Green, G (s)		17.7	70.2		17.7	45.5	52.5	52.5		27.8	27.8	
Effective Green, g (s)		13.7	62.2		13.7	37.5	48.5	48.5		23.8	23.8	
Actuated g/C Ratio		0.12	0.57		0.12	0.34	0.44	0.44		0.22	0.22	
Clearance Time (s)		4.0	4.0		4.0	4.0	4.0	4.0		4.0	4.0	
Vehicle Extension (s)		3.0	3.0		3.0	3.0	3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)		221	1010		228	655	780	815		383	394	
v/s Ratio Prot			0.03			0.03	0.02	c0.09		c0.21	0.05	
v/s Ratio Perm		0.07	0.01		c0.11	0.02						
v/c Ratio		0.55	0.06		0.92	0.12	0.05	0.21		0.96	0.21	
Uniform Delay, d1		45.2	10.7		47.6	25.0	17.6	18.9		42.6	35.4	
Progression Factor		0.87	1.76		1.00	1.00	1.00	1.00		0.62	0.49	
Incremental Delay, d2		1.8	0.0		37.3	0.1	0.1	0.6		6.6	0.0	
Delay (s)		41.0	18.9		84.9	25.0	17.7	19.5		33.1	17.3	
Level of Service		D	B		F	C	B	B		C	B	
Approach Delay (s)		30.8			52.9			19.2			30.0	
Approach LOS		C			D			B			C	

Intersection Summary			
HCM Average Control Delay	36.1	HCM Level of Service	D
HCM Volume to Capacity ratio	0.53		
Actuated Cycle Length (s)	110.0	Sum of lost time (s)	24.0
Intersection Capacity Utilization	68.0%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Queuing Analysis Output

Lane Group	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	135	499	9	171	142	198	59	119
v/c Ratio	1.09	0.37	0.08	0.84	0.13	0.18	0.42	0.79
Control Delay	101.7	1.5	44.2	66.3	10.9	11.0	31.0	53.4
Queue Delay	0.0	5.9	0.0	0.1	0.0	0.0	0.0	0.0
Total Delay	101.7	7.3	44.2	66.3	10.9	11.0	31.0	53.4
Queue Length 50th (ft)	~112	23	6	87	39	54	0	87
Queue Length 95th (ft)	m75	m23	21	155	86	114	m87	m146
Internal Link Dist (ft)	193			985		797		270
Turn Bay Length (ft)		100	150		300		150	
Base Capacity (vph)	410	1339	383	566	1079	1124	451	470
Starvation Cap Reductn	0	770	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	25	154	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.33	0.88	0.02	0.32	0.15	0.18	0.13	0.25

Intersection Summary

~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.

m Volume for 95th percentile queue is metered by upstream signal.

Lane Group	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	83	316	7	203	270	141	98	60
v/c Ratio	0.40	0.24	0.05	0.90	0.26	0.13	0.75	0.42
Control Delay	46.5	1.5	40.3	80.2	13.1	11.7	57.7	27.9
Queue Delay	0.0	1.8	0.0	1.6	1.8	0.0	0.0	0.0
Total Delay	46.5	3.3	40.3	81.7	14.9	11.7	57.7	27.9
Queue Length 50th (ft)	48	19	4	128	84	40	75	30
Queue Length 95th (ft)	m51	m28	17	198	168	88	131	m83
Internal Link Dist (ft)	193			985		797		270
Turn Bay Length (ft)		100	150		300		150	
Base Capacity (vph)	544	1305	405	564	1047	1093	451	468
Starvation Cap Reductn	0	813	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	213	612	0	0	4
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.15	0.64	0.02	0.58	0.62	0.13	0.22	0.13

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

Lane Group	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	340	863	234	515	1192	306	117	227
v/c Ratio	0.62	0.69	0.74	0.76	2.48	0.61	0.50	0.91
Control Delay	13.7	12.6	45.8	35.8	692.7	42.3	30.6	58.8
Queue Delay	78.9	254.0	0.0	672.5	7.9	0.0	0.0	673.9
Total Delay	92.5	266.6	45.8	708.4	700.7	42.3	30.6	732.7
Queue Length 50th (ft)	133	569	140	288	~1410	187	86	167
Queue Length 95th (ft)	m62	m74	#272	432	#1726	#325	m115	m217
Internal Link Dist (ft)	193			985		797		270
Turn Bay Length (ft)		100	150		300		150	
Base Capacity (vph)	551	1249	315	678	481	500	451	471
Starvation Cap Reductn	256	696	0	0	0	0	0	8
Spillback Cap Reductn	0	0	0	677	305	0	0	466
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	1.15	1.56	0.74	515.00	6.77	0.61	0.26	45.40

Intersection Summary

~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

m Volume for 95th percentile queue is metered by upstream signal.

Lane Group	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	573	1153	135	423	639	332	327	176
v/c Ratio	0.84	0.95	1.09	0.63	1.66	0.82	0.95	0.49
Control Delay	19.7	24.6	143.3	32.8	336.3	56.0	35.2	22.2
Queue Delay	237.9	395.5	0.0	673.6	376.6	0.0	2.8	674.3
Total Delay	257.6	420.2	143.3	706.4	712.9	56.0	38.0	696.5
Queue Length 50th (ft)	303	763	~108	226	~657	210	246	127
Queue Length 95th (ft)	m136	m150	#248	370	#878	#358	m218	m117
Internal Link Dist (ft)	193			985		797		270
Turn Bay Length (ft)		100	150		300		150	
Base Capacity (vph)	685	1209	124	667	386	403	451	472
Starvation Cap Reductn	310	599	0	0	0	0	54	0
Spillback Cap Reductn	0	0	0	624	199	0	0	471
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	1.53	1.89	1.09	9.84	3.42	0.82	0.82	176.00

Intersection Summary

~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

m Volume for 95th percentile queue is metered by upstream signal.

Lane Group	EBT	EBR	WBT	WBR	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	220	162	117	395	49	234	130	197
v/c Ratio	0.92	0.14	0.55	0.50	0.05	0.25	0.58	0.83
Control Delay	63.7	2.1	52.8	4.2	17.4	17.7	35.2	50.7
Queue Delay	0.1	1.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	63.8	3.1	52.8	4.2	17.4	17.7	35.2	50.7
Queue Length 50th (ft)	148	9	78	0	16	85	96	144
Queue Length 95th (ft)	m130	m14	129	51	47	176	m135	m199
Internal Link Dist (ft)	193		985			797		270
Turn Bay Length (ft)		100			300		150	
Base Capacity (vph)	539	1197	300	801	919	955	451	471
Starvation Cap Reductn	36	823	0	0	0	0	0	9
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.44	0.43	0.39	0.49	0.05	0.25	0.29	0.43

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

Lane Group	EBT	EBR	WBT	WBR	NBL	NBT	SBL	SBT
Lane Group Flow (vph)	121	104	209	239	39	171	367	89
v/c Ratio	0.55	0.10	0.92	0.30	0.05	0.21	0.96	0.22
Control Delay	44.3	3.4	87.8	2.9	21.8	22.1	34.0	15.2
Queue Delay	0.0	0.0	203.5	0.0	0.1	0.0	29.4	0.0
Total Delay	44.3	3.4	291.3	2.9	21.9	22.1	63.4	15.2
Queue Length 50th (ft)	77	8	148	0	16	74	279	59
Queue Length 95th (ft)	m81	m15	219	38	42	140	m226	m46
Internal Link Dist (ft)	193		985			797		270
Turn Bay Length (ft)		100			300		150	
Base Capacity (vph)	549	1047	349	779	779	815	451	470
Starvation Cap Reductn	26	0	0	0	0	0	95	0
Spillback Cap Reductn	0	0	203	0	351	0	0	3
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.23	0.10	1.43	0.31	0.09	0.21	1.03	0.19

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

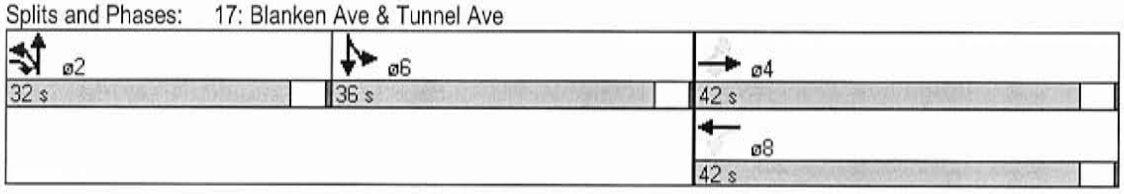
Timing and Phasing Plans

Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations									
Volume (vph)	16	109	459	8	78	131	169	54	97
Turn Type	Perm		pm+ov	Perm		Split		Split	
Protected Phases		4	2		8	2	2	6	6
Permitted Phases	4		4	8					
Detector Phase	4	4	2	8	8	2	2	6	6
Switch Phase									
Minimum Initial (s)	10.0	10.0	15.0	10.0	10.0	15.0	15.0	10.0	10.0
Minimum Split (s)	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0
Total Split (s)	42.0	42.0	32.0	42.0	42.0	32.0	32.0	36.0	36.0
Total Split (%)	38.2%	38.2%	29.1%	38.2%	38.2%	29.1%	29.1%	32.7%	32.7%
Yellow Time (s)	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
All-Red Time (s)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Lost Time Adjust (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Total Lost Time (s)	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Lead/Lag									
Lead-Lag Optimize?									
Recall Mode	None	None	C-Max	None	None	C-Max	C-Max	None	None
Act Effct Green (s)		10.3	85.3	10.3	10.3	67.0	67.0	8.7	8.7
Actuated g/C Ratio		0.09	0.78	0.09	0.09	0.61	0.61	0.08	0.08
v/c Ratio		1.09	0.37	0.08	0.84	0.13	0.18	0.42	0.79
Control Delay		101.7	1.5	44.2	66.3	10.9	11.0	31.0	53.4
Queue Delay		0.0	5.9	0.0	0.1	0.0	0.0	0.0	0.0
Total Delay		101.7	7.3	44.2	66.3	10.9	11.0	31.0	53.4
LOS		F	A	D	E	B	B	C	D
Approach Delay		27.4			65.2		11.0		46.0
Approach LOS		C			E		B		D

Intersection Summary

Cycle Length: 110
Actuated Cycle Length: 110
Offset: 54 (49%), Referenced to phase 2:NBTL, Start of Green
Natural Cycle: 60
Control Type: Actuated-Coordinated
Maximum v/c Ratio: 1.09
Intersection Signal Delay: 30.8
Intersection LOS: C
Intersection Capacity Utilization 65.7%
ICU Level of Service C
Analysis Period (min) 15

Splits and Phases: 17: Blanken Ave & Tunnel Ave



Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	SBL	SBT
Protected Phases		4	2		8	2	2	6	6
Permitted Phases	4		4	8					
Minimum Initial (s)	10.0	10.0	15.0	10.0	10.0	15.0	15.0	10.0	10.0
Minimum Split (s)	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0
Total Split (s)	42.0	42.0	32.0	42.0	42.0	32.0	32.0	36.0	36.0
Total Split (%)	38.2%	38.2%	29.1%	38.2%	38.2%	29.1%	29.1%	32.7%	32.7%
Maximum Green (s)	38.0	38.0	28.0	38.0	38.0	28.0	28.0	32.0	32.0
Yellow Time (s)	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
All-Red Time (s)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Lead/Lag									
Lead-Lag Optimize?									
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Minimum Gap (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Time Before Reduce (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Time To Reduce (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Recall Mode	None	None	C-Max	None	None	C-Max	C-Max	None	None
Walk Time (s)	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Flash Dont Walk (s)	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0
Pedestrian Calls (#/hr)	0	0	0	0	0	0	0	0	0
90th %ile Green (s)	19.9	19.9	61.1	19.9	19.9	61.1	61.1	17.0	17.0
90th %ile Term Code	Hold	Hold	Coord	Gap	Gap	Coord	Coord	Gap	Gap
70th %ile Green (s)	16.1	16.1	67.7	16.1	16.1	67.7	67.7	14.2	14.2
70th %ile Term Code	Hold	Hold	Coord	Gap	Gap	Coord	Coord	Gap	Gap
50th %ile Green (s)	13.7	13.7	72.1	13.7	13.7	72.1	72.1	12.2	12.2
50th %ile Term Code	Gap	Gap	Coord	Hold	Hold	Coord	Coord	Gap	Gap
30th %ile Green (s)	11.6	11.6	76.2	11.6	11.6	76.2	76.2	10.2	10.2
30th %ile Term Code	Gap	Gap	Coord	Hold	Hold	Coord	Coord	Gap	Gap
10th %ile Green (s)	10.0	10.0	78.0	10.0	10.0	78.0	78.0	10.0	10.0
10th %ile Term Code	Min	Min	Coord	Min	Min	Coord	Coord	Min	Min

Intersection Summary

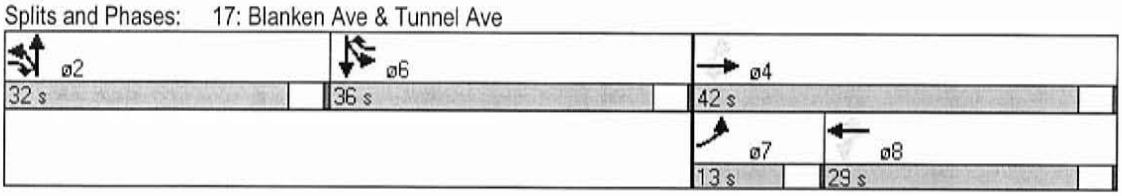
Cycle Length: 110
Actuated Cycle Length: 110
Offset: 54 (49%), Referenced to phase 2:NBTL, Start of Green
Control Type: Actuated-Coordinated

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations										
Volume (vph)	26	177	149	13	95	363	45	195	120	161
Turn Type	pm+pt		pm+ov	Perm		pm+ov	Split		Split	
Protected Phases	7	4	2		8	6	2	2	6	6
Permitted Phases	4		4	8		8				
Detector Phase	7	4	2	8	8	6	2	2	6	6
Switch Phase										
Minimum Initial (s)	4.0	10.0	15.0	10.0	10.0	10.0	15.0	15.0	10.0	10.0
Minimum Split (s)	8.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0
Total Split (s)	13.0	42.0	32.0	29.0	29.0	36.0	32.0	32.0	36.0	36.0
Total Split (%)	11.8%	38.2%	29.1%	26.4%	26.4%	32.7%	29.1%	29.1%	32.7%	32.7%
Yellow Time (s)	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
All-Red Time (s)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Lost Time Adjust (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Total Lost Time (s)	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Lead/Lag	Lead			Lag	Lag					
Lead-Lag Optimize?	Yes			Yes	Yes					
Recall Mode	None	None	C-Max	None	None	None	C-Max	C-Max	None	None
Act Effct Green (s)		15.1	80.2		15.1	36.9	57.1	57.1	13.8	13.8
Actuated g/C Ratio		0.14	0.73		0.14	0.34	0.52	0.52	0.13	0.13
v/c Ratio		0.92	0.14		0.55	0.50	0.05	0.25	0.58	0.83
Control Delay		63.7	2.1		52.8	4.2	17.4	17.7	35.2	50.7
Queue Delay		0.1	1.0		0.0	0.0	0.0	0.0	0.0	0.0
Total Delay		63.8	3.1		52.8	4.2	17.4	17.7	35.2	50.7
LOS		E	A		D	A	B	B	D	D
Approach Delay		38.1			15.3			17.6		44.6
Approach LOS		D			B			B		D

Intersection Summary

Cycle Length: 110
Actuated Cycle Length: 110
Offset: 54 (49%), Referenced to phase 2:NBTL, Start of Green
Natural Cycle: 70
Control Type: Actuated-Coordinated
Maximum v/c Ratio: 0.92
Intersection Signal Delay: 27.9
Intersection LOS: C
Intersection Capacity Utilization 65.7%
ICU Level of Service C
Analysis Period (min) 15

Splits and Phases: 17: Blanken Ave & Tunnel Ave



Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Protected Phases	7	4	2		8	6	2	2	6	6
Permitted Phases	4		4	8		8				
Minimum Initial (s)	4.0	10.0	15.0	10.0	10.0	10.0	15.0	15.0	10.0	10.0
Minimum Split (s)	8.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0
Total Split (s)	13.0	42.0	32.0	29.0	29.0	36.0	32.0	32.0	36.0	36.0
Total Split (%)	11.8%	38.2%	29.1%	26.4%	26.4%	32.7%	29.1%	29.1%	32.7%	32.7%
Maximum Green (s)	9.0	38.0	28.0	25.0	25.0	32.0	28.0	28.0	32.0	32.0
Yellow Time (s)	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
All-Red Time (s)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Lead/Lag	Lead			Lag	Lag					
Lead-Lag Optimize?	Yes			Yes	Yes					
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Minimum Gap (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Time Before Reduce (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Time To Reduce (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Recall Mode	None	None	C-Max	None	None	None	C-Max	C-Max	None	None
Walk Time (s)		5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Flash Dont Walk (s)		11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0
Pedestrian Calls (#/hr)		0	0	0	0	0	0	0	0	0
90th %ile Green (s)	0.0	25.9	46.6	25.9	25.9	25.5	46.6	46.6	25.5	25.5
90th %ile Term Code	Skip	Gap	Coord	Hold	Hold	Gap	Coord	Coord	Gap	Gap
70th %ile Green (s)	0.0	21.9	55.0	21.9	21.9	21.1	55.0	55.0	21.1	21.1
70th %ile Term Code	Skip	Gap	Coord	Hold	Hold	Gap	Coord	Coord	Gap	Gap
50th %ile Green (s)	0.0	19.1	61.2	19.1	19.1	17.7	61.2	61.2	17.7	17.7
50th %ile Term Code	Skip	Gap	Coord	Hold	Hold	Gap	Coord	Coord	Gap	Gap
30th %ile Green (s)	0.0	16.2	67.5	16.2	16.2	14.3	67.5	67.5	14.3	14.3
30th %ile Term Code	Skip	Gap	Coord	Hold	Hold	Gap	Coord	Coord	Gap	Gap
10th %ile Green (s)	0.0	12.2	75.2	12.2	12.2	10.6	75.2	75.2	10.6	10.6
10th %ile Term Code	Skip	Gap	Coord	Hold	Hold	Gap	Coord	Coord	Gap	Gap

Intersection Summary

Cycle Length: 110
Actuated Cycle Length: 110
Offset: 54 (49%), Referenced to phase 2:NBTL, Start of Green
Control Type: Actuated-Coordinated

Truck Turning Template Analysis

20'
20'
13'
10'-8"
9'
45'-6"
BAYSHORE BLVD
BLANKEN AVENUE

12'
12'
16'
13'
10'-8"
5'
45'-6"
Bus Stop
Bike Path
Muni Station
BLANKEN AVENUE
BAYSHORE BLVD

BLANKEN AVENUE
TUNNEL AVENUE
14'
12'
14'
14'
12'
14'
45'-6"
12'
12'
12'
45'-6"
14'
12'
14'